Indigenous and Northern Affairs Canada | Affaires autochtones et du Nord Canada

Water Resources Division
Resource Management Directorate
Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence
1BH-IBF----

May 29, 2018

Our file - Notre référence
CIDM#1220639

Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0

Re: Indigenous and Northern Affairs Canada's comments on Inukshuk Construction Ltd.'s application for water licence #1BR-IBH---- – QEC Iqaluit Bulk Fuel Storage Farm Upgrade

Dear Mr. Dwyer,

Thank you for your April 25, 2018 invitation for technical review comments on the above referenced application.

The Water Resources Division of Indigenous and Northern Affairs Canada (INAC) examined the application and the results of our review are provided in the enclosed memorandum for the Nunavut Water Board's consideration. Comments have been provided pursuant to INAC's mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

INAC appreciates the opportunity to participate in this review. If there are any questions or concerns, please contact me at (867) 975-3876 or by e-mail at sarah.forte@canada.ca.

Sincerely,

Sarah Forté
Water Management Specialist

Canada

Technical Review Memorandum

To: Richard Dwyer, Manager of Licensing, Nunavut Water Board

From: Sarah Forté, Water Management Specialist, Water Resources Division, INAC

Date: May 29, 2018

Re: Review of New Application for Type B Water Licence 1BH-IBH----

Applicant: Inukshuk Construction Ltd.
Project: QEC Iqaluit Bulk Fuel Storage Farm Upgrade
Region: Qikiqtani

A. BACKGROUND

On April 25, 2018 the Nunavut Water Board (Board) provided notification of Inukshuk Construction Ltd.'s (the applicant) submission of an application for new Type B water licence 1BH-IBF---- for the QEC Iqaluit Bulk Fuel Storage Farm Upgrade Project.

The applicant is requesting a one year licence to pump water from two shallow ponds for the hydrostatic testing of a 5 700 m^3 fuel storage tank to be constructed next to the power plant in Iqaluit. Over 19 days, they are proposing to abstract 3 600 m^3 from Pond 1, adjacent to Pingua Street, and 2 100 m^3 from Pond 2, west of Anuri Road. After the test, the water would be returned to the ponds from which it was taken.

The Board requested interested parties review the application and make representations by May 25, 2018.

B. RESULTS OF REVIEW

On behalf of Indigenous and Northern Affairs Canada (INAC) Water Resources, the following comments and recommendations are provided for the Board's consideration.

1. Spill Contingency Plan

Comment:
No Spill Contingency Plan was included in the application and it is a necessary component of every application. For this project, the plan should include a description of measures taken to prevent leaks or fuelling spills from the two centrifugal pumps which will be used to pump water from the ponds.

Recommendation:
The applicant should be required to provide a Spill Contingency Plan.

2. Annual reports

Reference:

- 1BH-IBF---- Type "B" Water Licence Application, Inukshuk Construction Ltd., April 25, 2018

Comment:
The applicant has not proposed any changes to the Board's "*Standardized Form for Annual Reporting*". They are proposing to make data from water quality tests available to the public. The annual report may be an appropriate venue for making water quality data available to the public.

Recommendation:
We recommend that the annual report require reporting of water quality data or that the applicant specify how they will disseminate the results.

3. Public engagement

Reference:

- 1BH-IBF---- Type "B" Water Licence Application, Inukshuk Construction Ltd., April 25, 2018
- Re: Notice of Screening for Qulliq Energy Corporation (QEC) project proposal "Iqaluit Power Plant Bulk Fuel Storage", Andrew Medeiros, March 17, 2018

Comment:
The application has the mention N/A in box 20, relating to consultation. However, the letter from Mr. Medeiros states: "*Due to the close proximity of both systems to housing developments there will be undoubtable public concern over the reduction of surface area in these systems, following the above recommendations should minimize those concerns*."

We concur with Mr. Medeiros' statement regarding public concern, given the quantity of water to be abstracted from the ponds and their locations right in town with houses overlooking them. As well the noise from the pumping might be a concern to the public, maybe an annoyance more than anything.

Recommendation:
In order to mitigate public concerns and the resulting calls to the City, INAC inspectors and the NWB, we recommend the applicant be required to inform the public of the proposed water abstractions before they occur.

4. Incomplete information on water bodies

Reference:

- 1BH-IBF---- Type “B” Water Licence Application, Inukshuk Construction Ltd., April 25, 2018
- Re: Notice of Screening for Qulliq Energy Corporation (QEC) project proposal “Iqaluit Power Plant Bulk Fuel Storage”, Andrew Medeiros, March 17, 2018

Comment:

The applicant has provided incomplete information on the ponds from which they propose to abstract water, which makes it difficult to assess the impacts. The Nunavut Impact Review Board decision which is appended to the application includes the statement: “*The Proponent has noted that the waterbodies from which water will be withdrawn for hydrostatic testing are not known to contain fish or other wildlife and are not connected to nearby streams and rivers nor connected to the City’s potable water source*”.

The premise that the ponds are not fish bearing is not supported by documentation and may be contradicted by the statement by Mr. Medeiros: “*Neither system is exceptional in their freshwater habitat or freshwater biota such that a 10% withdrawal from either source will have a significant impact on ecosystem functioning*”.

If the ponds are not fish bearing, staying above 10% withdrawal is not critical. However, if these ponds are fish bearing, then if would be necessary to provide estimates of their volumes, in order to determine acceptable water abstraction quantities.