



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
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Your file - Votre référence
1BR-CST1723
Our file - Notre référence
GCDocs# 110416870

March 3, 2023

Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: licensing@nwb-oen.ca

**Re: Crown-Indigenous Relations and Northern Affairs Canada's Review of the
Licence Renewal Application for the Cambridge Bay Soils and Water Treatment
facility, Type B Water Licence No. 1BR-CST1723**

Dear Richard ,

Thank you for the February 10, 2023 invitation to review the referenced licence renewal application, submitted by Kitikmeot Environmental LTD., for Type B Water Licence No. 1BR-CST1723.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the application pursuant to its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*. Please find CIRNAC comments and recommendations in the attached Technical Memorandum.

If there are any questions or concerns, please contact me at (867) 975-4550 or andrew.keim@rcaanc-cirnac.gc.ca

Sincerely,

Andrew Keim
Manager
Water Resources, Nunavut Regional Office
Crown-Indigenous Relations and Northern Affairs Canada



Technical Review Memorandum

Date: March 3, 2023

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

From: Andrew Keim, Manager- Waters - CIRNAC

Subject: **Crown-Indigenous Relations and Northern Affairs Canada's Review of the Licence Renewal Application for the Cambridge Bay Soils and Water Treatment facility, Type B Water Licence No. 1BR-CST1723**

Region: ☒ Kitikmeot ☐ Kivalliq ☐ Qikiqtani

A. BACKGROUND

The "Cambridge Bay Soil and Water Treatment Facility" project is located within the Kitikmeot region approximately 700 metres (m) northeast of the Hamlet of Cambridge Bay, but within the Block Transfer as set out under commissioners lands. The project was intended to provide waste management services to the community as a viable option for dealing with contaminated soil and snow/water, and to provide the landfill with a source of daily cover material. The business was to remediate soils that could be then sold back to the community.

The original proponent constructed and operated a permanent soil and water treatment facility for a number of years before going out of business. A new Company Kitikmeot Environmental has taken over the facility since 2020 and provided a financial statement showing consistent losses during the period.

The project, when originally licensed, included the following undertakings, works or activities:

- Use of an existing contaminated soil storage area for construction and operation of a permanent soil and water treatment facility;
- Undertake in-situ soil and water sampling activities to determine pre-operational background condition of the proposed site;
- Construction of engineered cells within the proposed facility for receipt, storage and treatment of petroleum hydrocarbon contaminated soil, including storage of up to 170 cubic metres (m³) of petroleum contaminated snow and water;
- Utilize a bermed and lined soil treatment pad for storage of hazardous waste containers (drums and bags) awaiting transportation to authorized facilities for disposal;
- Use of one (1) small package treatment plant to treat petroleum contaminated water;



- Use of dump truck and bobcat skid steer for soil and snow delivery to the site, and subsequent removal and truck haulage of treated soils from the facility to the landfill;
- Use of trash pump to remove water to and out from treatment plant;
- Use of an excavator for snow and soil piling, and for aerating and loading soils into trucks;
- Use of up to two (2) above ground storage tanks for treated water storage;
- Use of one (1) small shed for storage of supplies, and documentation of health and safety equipment; and
- Undertake weekly site inspections of the facility during snow-free months, and monthly inspections during winter months.

The proponent has submitted the required Annual reports and provided confirmation of activities consistent with the terms and conditions of their Type b water license as well as those contained with in the project certificate.

CIRNAC provides the following comments and recommendations pertaining to the application package. A summary of the subjects of recommendations can be found in Table 1. Documents reviewed as part of this submission can be found in Table 2 of Section B. Detailed technical review comments can be found in Section C.

Table 1: Summary of Recommendations

Recommendation Number	Subject



B. DOCUMENTS REVIEWED AND REFERENCED

The following table (Table 2) provides a list of the documents reviewed under the submission and reference during the review.

Table 2: Documents Reviewed and Referenced

Document Title	Author, File No., Rev., Date
170323 1BR-CST1723 New Licence-FSJE	Nunavut Water Board, March 2017
170814 1BR-CST1723 Water Monitoring Plan INAC Comments-ILAE	CIRNAC- August, 2017
190716 1BR-CST1723 2017 and 2018 Annual Reports Tech Review-OSKE	Nunavut Water Board, 2019
200330 1BR-CST1723 2019 Annual Report-IMLE	Kitikmeot Environmental Ltd, 2019
200601 1BR-CST1723 2019 Annual Reports Tech Review - OSKE	Nunavut Water Board, 2020
210310 1BR-CST1723 2020 Annual Report-IAAE	Kitikmeot Environmental Ltd, 2020
210312 1BR-CST1723 KEI cam-bay 2020 Annual Report-OAAE	Nunavut Water Board – Email – 12/03/21
220309 1BR-CST1723 2021 Annual Report-IMLE	Kitikmeot Environmental Ltd, 2021
221020 1BR-CST1723 2022-KIT-JKM09 Water Licence Inspection Report-ILAE	CIRNAC- Inspector- 10/20/2022
221221 1BR-CST1723 2021 Kitikmeot Environmental Ltd. - Financial Statements-IMLE	Kitikmeot Environmental Ltd. 7/31/2021
221221 1BR-CST1723 160826-16XN034- Screening Decision Report-OT5E	Nunavut Impact review Board 8/26/2016
221221 1BR-CST1723 Application for Water Licence Renewal-IMLE	Kitikmeot Environmental Ltd. 12/22/2022
221221 1BR-CST1723 Certificate Amendment KEL Name Change Dec 2018-IMLE	Kitikmeot Environmental Ltd. 12/21/2018
221221 1BR-CST1723 Cover Letter-IMLE	Kitikmeot Environmental Ltd. 12/22/2022
221221 1BR-CST1723 Hamlet Agreement Letter- IMLE	Municipality of Cambridge Bay 09/12/2016
221221 1BR-CST1723 KEL Security Estimate - CB SWTF - Reclaim 7.0-IMLE	Kitikmeot Environmental Ltd. , Undated
221221 1BR-CST1723 Kitikmeot Environmental Ltd. Certificate 001DEC052019-IMLE	Kitikmeot Environmental Ltd. 11/05/2019
221221 1BR-CST1723 SWTF_CRP_20221221 Final V2.1-IMLE	Kitikmeot Environmental Ltd. 12/22/2022
221221 1BR-CST1723 SWTF_EPP_20221221 Final V2.1-IMLE	Kitikmeot Environmental Ltd. 12/22/2022
221221 1BR-CST1723 SWTF_ERP_20221221 Final V2.1-IMLE	Kitikmeot Environmental Ltd. 12/22/2022
221221 1BR-CST1723 SWTF_OMP_20221221 Final V2.1-IMLE	Kitikmeot Environmental Ltd. 12/22/2022
221221 1BR-CST1723 SWTF_SCP_20221221	Kitikmeot Environmental Ltd.



Document Title	Author, File No., Rev., Date
Final V2.1-IMLE	12/22/2022
221221 1BR-CST1723 SWTF_WMP_20221221 Final V2.1-IMLE	Kitikmeot Environmental Ltd. 12/22/2022
230210 1BR-CST1723 Water Licence Renewal Notice-OMLE	Nunavut Water Board 02/10/2023
230210 1BR-CST1723 Water Licence Renewal- OMLE	Nunavut Water Board 02/10/23



C. RESULTS OF REVIEW

1. 221221 1BR-CST1723 Hamlet Agreement Letter

Comment:

In the text of the letter provided the following is detailed in the motion contained within the letter. ***“Now therefore, be it resolved that the Hamlet Council supports the project in principal and are interested in soil remediation, but will reserve final approval pending the Environmental screening processes by NIRB and the Nunavut Water Board.”***

The letter of support was provided in 2016 before the completion of the above noted screenings.

Recommendation:

(R-01) CIRNAC recommends that The Hamlet be approached for a follow up letter acknowledging their continued support of the project in the community.

2. Update contact information in PLANS..

Comment:

The department and title INAC has been replaced by the new Department referred to as Crown Indigenous Relations and Northern Affairs Canada (CIRNAC). All listed Plans under Reporting should update this information.

Recommendation:

(R-02) CIRNAC recommends that the proponent update the Name of the department in all of its submitted plans.

3. Spill Contingency Planning.

Comment:

Step 12 under reporting notes that INAC staff (CIRNAC), will be notified of the spill following the submission of the spill report and in subsequent updates. This is fine but the proponent should be aware that as a licensed Facility all spills are to be reported to the CIRNAC manager of field operations so that an inspector may be assigned to the file as lead on the file. This should be done at the same time as the spill report is filed not in subsequent updates on the spill.



Recommendation:

(R-03) CIRNAC recommends that as soon as the proponent becomes aware of a spill that as soon as it is safe to do so that when filing the spill report, the Manager of Field Operations, CIRNAC should be notified of the spill.