



*Your file - Votre référence*  
1BR-LOR0813

August 31, 2015

*Our file - Notre référence*  
IQALUIT-#938778

Robin Ikkutislik  
A/Manager of Licensing  
Nunavut Water Board  
GJOA HAVEN, NU X0E 1J0

Sent via email: [licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca)

Dear Ms. Ikkutislik,

**Re: Aboriginal Affairs and Northern Development Canada Contaminated Sites Program  
Application to Amend and Renew Water Licence No. 1BR-LOR0813**

Thank you for your email of July 31, 2015, concerning the above mentioned water licence amendment-renewal application. A memorandum is provided for the Nunavut Water Board's consideration. Comments and recommendations have been provided pursuant to Aboriginal Affairs and Northern Development Canada's mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

Please do not hesitate to contact me by telephone at 867-975-4555 or email at [David.Abernethy@aandc-aadnc.gc.ca](mailto:David.Abernethy@aandc-aadnc.gc.ca) for further information.

Sincerely,

David Abernethy

Regional Coordinator  
Water Resources Division  
Resource Management Directorate  
Aboriginal Affairs and Northern Development Canada  
IQALUIT, NU X0A 0H0

Encl.

c.c.: Andrew Keim, A/Manager, Water Resources Division, AANDC Nunavut  
Erik Allain, Manager, Field Operations Division, AANDC Nunavut

# Memorandum

To: Robin Ikkutislik, Nunavut Water Board

From: David Abernethy, Aboriginal Affairs and Northern Development Canada

CC: Andrew Keim (AANDC) and Erik Allain (AANDC)

Date: August 31, 2015

**Re: Application to Amend and Renew Water Licence No. 1BR-LOR0813**

Applicant: Aboriginal Affairs and Northern Development Canada, Contaminated Sites Program

Project: Cape Christian Long Term Monitoring Program

Region: Qikiqtani

---

## Comments:

### A. Background

On July 31, 2015, the Nunavut Water Board (NWB) provided notification of Aboriginal Affairs and Northern Development Canada's Contaminated Sites Program (AANDC-CSP or the "Licensee") application to amend and renew the existing type B water licence for their Cape Christian Long Term Monitoring Program, Water Licence No. 1BR-LOR0813.

Interested parties were asked to review this application and provide comments by August 31, 2015.

### B. Results of review

On behalf of Aboriginal Affairs and Northern Development Canada's Water Resources Division, the following comments and recommendations are provided:

#### 1. **Licence Term**

Source: Aboriginal Affairs and Northern Development Canada – Contaminated Sites Program. *Amendment for Water Licence Amendment-Renewal*. Block 25: Proposed Term of Licence. Nunavut Water Board Reference: 140718 1BR-LOR0813. July 18, 2014.

Indian and Northern Affairs Canada, Northern Affairs Organization, Contaminated Sites Program. *Abandoned Military Site Remediation Protocol*. December 2008.

Indian and Northern Affairs Canada, Northern Affairs Organization,  
Contaminated Sites Program. *Cape Christian Long Term Monitoring Plan*.  
Nunavut Water Board Reference: 140801 1BR-LOR0813 Cape Christian Long  
Term Monitoring Plan Feb. 2009-ILAE. February 10, 2009.

- Comment: The Licensee is requesting a 22 year licence renewal term from May 2013 (existing licence expired May 1, 2013) to September 2035. The project's 25 year long-term monitoring plan was initiated in 2011 and will be carried out under the proposed licence term. Monitoring of the Non-Hazardous Waste Landfill will be conducted in accordance with the 2009 *Cape Christian Long Term Monitoring Plan* and AANDC's *Abandoned Military Site Remediation Protocol*, involving: (i) post-closure monitoring of the NHWL; and (ii) the natural environment monitoring of the site.
- Recom: The proposed 22 year licence renewal term should be accepted because it will coincide with the project's 25 year long term monitoring program. The consumption of water and generation of wastes associated with the long term monitoring plan is negligible.

## **2. Water Consumption**

- Source: Aboriginal Affairs and Northern Development Canada – Contaminated Sites Program. *Amendment for Water Licence Amendment-Renewal*. Block 13: Quantity of Water Involved. Nunavut Water Board reference: 140718 1BR-LOR0813. July 18, 2014.
- Comment: The Licensee is requesting the use of less than one cubic metre of water per day when collecting water quality samples from ground water monitoring wells.
- Recom: The licence should be amended to include a daily water consumption limit of one cubic metre to allow for the collection of ground water samples.

## **3. Licensee Contact Information**

- Source: Aboriginal Affairs and Northern Development Canada – Contaminated Sites Program. *Amendment for Water Licence Amendment-Renewal*. Block 1: Licensee Contact Information. Nunavut Water Board Reference: 140718 1BR-LOR0813. July 18, 2014.
- Aboriginal Affairs and Northern Development Canada – Contaminated Sites Program. *RE: 1BR-LOR0813 Water License Amendment and Renewal Application – Cape Christian Long Term Monitoring Program*. Letter from Mr. M. Yetman of Aboriginal Affairs and Northern Development Canada to Ms. P. Beaulieu of the Nunavut Water Board. Nunavut Water Board reference: 140718 1BR-LOR0813 Amend Renew Cover Letter-IMLE. July 18, 2014.
- Nunavut Water Board. *Subject: Aboriginal Affairs and Northern Development Canada – Cape Christian Long Term Monitoring Program – Amendment*

*Renewal – Type “B”.* Letter from Ms. R. Ikkutisluk to Ms. C. Lamontagne of Aboriginal Affairs and Northern Development Canada. Nunavut Water Board reference: 150731 1BR-LOR0813 Distribution Review-OLAE. July 31, 2015

Comment: It is not clear who is the current Licensee contact. The submitted July 18, 2014 application form references Ms. Natalie Plato as the Licensee contact whereas the July 18, 2014 cover letter was submitted by Mark Yetman (A/Director of AANDC-CSP) and the July 31, 2015 NWB application notice is addressed to Charlotte Lamontagne.

Recom: The NWB should confirm with Charlotte Lamontagne whether or not she is the current Licensee contact.

#### **4. Required Addendum to 2009 Cape Christian Long Term Monitoring Plan**

Source: Nunavut Water Board. *RE: Submission of Long Term Monitoring Plan, Indian and Northern Affairs Canada (INAC), Contaminated Sites; Cape Christian LORAN Site, Licence No. 1BR-LOR0813.* Letter from Mr. S. Joseph, Nunavut Water Board, to Mr. D. Morakinyo, Aboriginal Affairs and Northern Development Canada. Nunavut Water Board Reference: 110302 1BR-LOR0813 Long Term Monitoring Plan-OSJE. March 2, 2011.

Comment: In its March 2, 2011 approval letter of the 2009 *Cape Christian Long Term Monitoring Plan*, the NWB required the Licensee to provide an addendum to the plan addressing certain items. There is no copy of an addendum to this plan on the NWB public registry.

Recom: The Licensee should provide the required addendum to the 2009 *Cape Christian Long Term Monitoring Plan*.

Prepared by David Abernethy