



Water Resources Division
Nunavut Regional Office
Iqaluit, NU X0A 0H0

Your file - Votre référence
2AM-WTP1826

May 2, 2019

Our file - Notre référence
CIDM# 1249592

Richard Dwyer
Manager of Licensing
Nunavut Water Board
Gjoa Haven, NU X0B 1J0

Sent via email: licensing@nwb-oen.ca

**Re: Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)
comments on New Type “B” Water Licence No. 1BR-SWT----.**

Dear Mr. Dwyer,

Thank-you for the email notice to interested parties, received on April 2, 2019, regarding Nunavut Excavating's water licence application for a soil and water treatment facility in Cambridge Bay.

CIRNAC reviewed and provided comment on Nunavut Excavating water licence application pursuant to its mandated responsibilities from the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

If you have any questions or require further information with respect to this matter, contact me at (867) 222-9278 or email ian.parsons@canada.ca

Regards,

Ian Parsons
Regional Coordinator, Water Resources, Nunavut Regional Office

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Technical Review Memorandum

To: Richard Dwyer, Manager of Licensing, NWB

From: Ian Parsons, Regional Coordinator, Water Resources Division – CIRNAC, NRO

Date: May 2, 2019

Re: **Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)
comments on New Type “B” Water Licence No. 1BR-SWT----**

Applicant:	Nunavut Excavating
Representative:	Glen Molloy
Project:	Soil and Water Treatment Facility
Region:	Kitikmeot

RESULTS OF REVIEW

Comments and recommendations are provided by CIRNAC Water Resources Division, pursuant to the Department’s mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

Background

Nunavut Excavating is proposing to build a soil and water treatment facility in Cambridge Bay. The proposed facility will be located nearby the existing landfill, approximately 650 meters northeast of the Hamlet. The proposed facility will collect and manage fuel contaminated soil and water from various locations in and around Cambridge Bay. The facility will also be used to remove petroleum byproducts from contaminated soil, water and snow, with the treated soil being sent to the landfill for reuse proposes to provide soil cover.

The land for the facility will be leased from the Hamlet and it is expected to be operated for a period of five years.

The facility will consist of three lined and bermed areas for soil, water and hazardous waste storage. Contaminated soils will be transported to the facility by trucks, and then mechanically aerated with an excavator or tilling equipment. If needed, the process will

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be amended to include microbial activity to achieve contaminant degradation. Fuel contaminated water will be treated using an on-site water treatment process.

Comments/Recommendations

1) Spill Contingency Plan

Comment: The Spill Contingency Plan did not contain any CIRNAC contact numbers. As CIRNAC inspectors enforce the terms and conditions of water licences their contact numbers should be included in all applicable plans, especially in case of spills.

CIRNAC Recommendation: Update the Spill Contingency Plan to include CIRNAC inspector contact numbers.

Comment: The Spill Contingency Plan did not state or indicate that spills would be reported to CIRNAC.

CIRNAC Recommendation: If spills happen at site it is anticipated that CIRNAC inspectors have to be notified. Please ensure that your Spill Contingency Plan is updated to reflect this reporting relationship.

2) Waste Management Plan

Comment: The Waste Management Plan describes the possibility of discharging treated water if it meets criteria.

CIRNAC Recommendation: CIRNAC recommends that before any discharging of treated effluent/water that the licensee notify the CIRNAC inspector.

Comment: The Waste Management Plan describes using treatment limits/criteria for water and soil through three different regulations (Government of Nunavut regulations, CCME guidelines and BC regulations).

CIRNAC Recommendation: CIRNAC recommends that the licensee try and stay consistent when using and referring to discharge criteria. Using other jurisdictions regulations (such as BC) may not be applicable to Nunavut. Also CIRNAC would like to remind the applicant that since the NWB is the authorizing agency for water licences, which allows for the discharge of wastes to the environment (i.e. treated water), they are also the body that sets discharge criteria to follow within a licence.

Comment: CIRNAC would like the applicant to clarify where the hazardous wastes that are to be stored in this area are coming from? Are these hazardous wastes a result of the operations of this facility or are they coming from the Hamlet?

CIRNAC Recommendation: CIRNAC recommends that the applicant clarify the source

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of the hazardous wastes.