



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

Your file - Votre référence  
1BR-THI1722  
Our file - Notre référence  
CIDM#1266639

October 28, 2019

Mr. 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 comments on  
1BR-THI1722 Amendment and Renew Application**

Dear Mr. Dwyer,

Thank you for your September 27, 2019 invitation to review and comment on the above-referenced amendment and renewal application.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) reviewed the documents submitted in support of the amendment and renewal 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*.

CIRNAC is aware that the licensee has already completed the construction of a new soil treatment cell within the facility footprint and would like to remind the licensee that Part G, Item 1 and Item 2 of the licence reads:

*"1. The Licensee shall submit to the Board for review, at least sixty (60) days prior to the commencement of construction of any dams, dykes or structures intended to contain, withhold, divert or retain Water or waste, including facilities or systems for the storage and treatment of hydrocarbon contaminated Water, for-construction design drawings and plans, stamped by an Engineer.*

*2. The Licensee shall provide to the Board, within ninety (90) days of completion of the construction of any dams, dykes or structures intended to contain, withhold, divert or retains water or waste, including facilities or systems for the*



*storage, treatment and disposal of hydrocarbon contaminated Water and wastes, design drawings and construction reports, including as-built drawings stamped by an Engineer, documentation of field decisions that deviate from original plans, and any data used to support these decisions.”*

CIRNAC notes that Item 12 of the application indicated no water usage. However, both the project Summary and the O&M Plan documents identified washing as a physical treatment step for contaminated soils (i.e., PHC-impacted soils). CIRNAC requests that the licensee clarify if water is needed for this washing step and if so, provide the source(s) and volume of water to be used.

CIRNAC also notes that hazardous and non-hazardous wastes are collected, identified, repackaged, and transported to accredited facilities in the south for final recycling and/or disposal. However, the quantities of the wastes were not reported in the 2017 and 2018 annual reports. Furthermore, the annual reports provided volumes of water treated and discharged, but not the quantities of contaminated soils treated and disposed. CIRNAC recommends that the annual report include information on the quantity of each type of waste treated and its final disposal or discharge location or destination.

CIRNAC appreciates the opportunity to participate in this review. If there is any question, please contact me at (867) 975-4555 or [david.zhong@canada.ca](mailto:david.zhong@canada.ca) or Mr. Godwin Okonkwo at (867) 975-4550 or [godwin.okonkwo@canada.ca](mailto:godwin.okonkwo@canada.ca).

Sincerely,

David Zhong  
Regulatory and Science Advisor