



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

*Your file - Votre référence*  
1BR-THI1419

July 14, 2016

*Our file - Notre référence*  
CIDM # 1081946

Karen Kharatyan  
Acting Manager of Licensing  
Nunavut Water Board  
Gjoa Haven, NU X0E 1J0

**Re: Indigenous and Northern Affairs Canada's (INAC) Review of Qikiqtaaluk Environmental Inc.'s Amendment Application for Water Licence #1BR-THI1419 – Environmental Waste Processing Facility**

Dear Mr. Kharatyan,

Thank-you for the email notice received on June 14, 2016 regarding the above mentioned application.

INAC Water Resources Division reviewed the amendment application submitted and the results of our review are provided in the enclosed memorandum for the Board's consideration. Comments have been provided 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*.

Please do not hesitate to contact me at 867-975-4282 or [ian.parsons@aandc-aadnc.gc.ca](mailto:ian.parsons@aandc-aadnc.gc.ca) for any additional information.

Regards,

Ian Parsons  
Regional Coordinator

c.c.: Scott Burgess, Acting Manager of Water Resources, INAC Nunavut Regional Office (NRO)  
Justin Hack, Water Resource Officer, INAC, NRO  
Erik Allain, Manager of Field Operations, INAC, NRO

# **Technical Review Memorandum**

## **A. BACKGROUND INFORMATION**

On June 14, 2016 the Nunavut Water Board provided notification to interested parties that Qikiqtaaluk Environment Inc. (the licensee) had submitted an amendment application for their Type 'B' water licence #1BR-THI1419.

The licence was initially granted for treating hydrocarbon impacted water and snow at a facility located at 1571 Kakivak Court in Iqaluit. However this facility will now be located at lot 666 West 40 Iqaluit, and will incorporate activities such as treatment of hydrocarbon impacted snow and water, hydrocarbon impacted soils and management of hazardous wastes, thus becoming an environmental waste processing facility.

Interested parties were requested to review the amendment application and provide comments by July 14, 2016.

## **B. RESULTS OF REVIEW**

### **1. Spills in/on Water**

#### **Source: Spill Contingency Plan**

**Comment:** The plans states that there is no section regarding spill procedures for spills on water as mitigation procedures that are in place make it highly unlikely that a deleterious substance can enter a waterway.

**Recommendation:** INAC acknowledges that the proponent may find that this scenario may be highly improbable; however, with the use of equipment on site and the yearly occurrence of spring melt/runoff/freshet, accidents do and may happen that would require the mitigation of spills involving water. Therefore INAC recommends that the licensee put spill contingency procedures in place for spills involving water.

### **2. Spills occurring during transport of contaminants**

**Source:** The entire application package including all plans

**Comment:** Although the application package does reference the proponents transport of contaminants from its facility to cargo ships including the storage/laydown area, for the shipping of contaminants to southern facilities, INAC could find no reference with regards to how spills will be prevented or mitigated involving the proponents transport of contaminated materials (using the proponents equipment) from source to its environmental processing facility.

**Recommendation:** INAC recommends that at the very least a spill kit be placed in any equipment being used to transport hazardous or deleterious substances.

### **3. Contact Personnel**

#### **Source: Spill Contingency Plan**

**Comment:** The spill contingency plan is missing INAC contact personnel.

**Recommendation:** The spill contingency plan should contain two key INAC personnel in case there is a spill, these personnel are:

- i) INAC Manager of Field Operations – Phone Number 867 975 4295
- ii) INAC Water Resources Officer – Phone Number 867 975 4517

### **4. Monitoring**

#### **Source: Environmental Protection Plan**

**Comment:** Although the licensee has described, in general detail, monitoring for contaminants outside of the containment structures. The licensee should describe its plan monitoring in a standalone document.

**Recommendation:** INAC recommends that the licensee submit to the NWB for review and approval a standalone monitoring plan for the site.

### **C. General**

INAC would like to remind the proponent that although the operation and maintenance plans are satisfactory, times may arise when these plans may have to be altered to optimize effectiveness or mitigation a potential spill. Therefore INAC recommends that any changes to these plans should be reported to the NWB as updates to the plan effected.

INAC also recommends that work should not commence at the facility until the licence amendment has been approved by the NWB.