Environnement et Climate Change Canada Changement climatique Canada

Environmental Protection Operations Directorate Prairie & Northern Region 5019 52<sup>nd</sup> Street, 4<sup>th</sup> Floor P.O. Box 2310 Yellowknife, NT X1A 2P7

ECCC File: 6200 000 030/003 NWB File: 1BR-THI1722

August 24, 2017

Via email to: licensing@nwb-oen.ca

Richard Dwyer Licence Administrator Nunavut Water Board P.O. Box 119 Gjoa Haven, NU X0B 1J0

Dear Richard Dwyer:

RE: 1BR-THI1722 – Qikiqtaaluk Environmental – Environmental Waste Processing Facility Igaluit Project – Type B Water Licence Amendment

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above-mentioned water licence amendment and is submitting comments via email as requested by the NWB. ECCC's specialist advice is provided based on our mandate, in the context of the Canadian Environmental Protection Act, the pollution prevention provisions of the Fisheries Act, the Migratory Birds Convention Act, and the Species at Risk Act.

The following comment is provided:

 In the Water Licence Amendment English Summary submitted to the NWB, the Proponent states that the new proposed parameter concentrations (pH, oil and grease, total arsenic, total cadmium, total copper, total lead, total mercury, total silver, total zinc, benzene, toluene and ethylbenzene) were extracted from existing NWB licences issued to companies working on similar activities.

ECCC recommends that further explanation and rationale for the proposed discharge criteria be provided which is based on risk to soils and best achievable treatment levels. To assess protection, ECCC recommends that a comprehensive soil monitoring program be completed.



Should you require further information, please do not hesitate to contact me at (867)669-4732 or Emily.Nichol@canada.ca.

Sincerely,

**Emily Nichol** 

**Environmental Assessment Coordinator** 

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cc: Bradley Summerfield, Senior Environmental Assessment Coordinator Georgina Williston, Head, Environmental Assessment North (NT and NU)