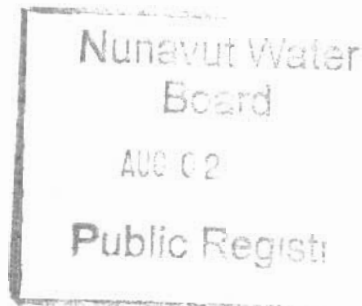


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August 1, 2002

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Re: Coral Harbour Water Licence Application - NWB3COR

On behalf of Environment Canada (EC) I have reviewed the documentation provided with the water licence application, and offer the following comments:

The basic infrastructure and plans for future facilities are adequate, but there are concerns with ongoing management practices at this site, primarily with the solid waste disposal. Management of the hazardous waste stream needs to be improved, and EC recommends that a secure facility, such as a sea can, be set up for storage of waste oils and lubricants, solvents, batteries, and any other hazardous waste. Methods for the final disposal need to be identified and implemented.

The solid waste site is impinging on the wetlands used for treatment and disposal of sewage wastes. Because of lack of waste segregation, and the potential for poor quality leachate to be emitted from the solid waste site, there is a concern that surface water quality and ultimately treatment capability of the wetlands will be compromised by contaminants moving from the landfill. It is recommended that separation of the two facilities be implemented and maintained.

Development and implementation of various plans are needed. It is noted that no reporting system for spills, nor any contingency plans for spill cleanup, are in place. Additionally, an operation and maintenance plan would be helpful in achieving better segregation of wastes and securing of hazardous wastes. An abandonment and restoration plan is also needed for the closure of the landfill site within five years.

Other concerns center largely around improved housekeeping. Bulky wastes should be consolidated to reduce the footprint of the solid waste disposal sites, and to facilitate compaction of domestic wastes. Fencing is needed to reduce windblown litter, and garbage (e.g. barrels) should be removed from the sewage disposal area. The current practice of disposal of honeybags with the solid wastes is inadvisable, and a small pit should be provided at the sewage site for this.

020801COR EC Comments - ISTE

Please do not hesitate to contact me at (867) 669-4735 or by email at anne.wilson@ec.gc.ca with any questions or comments regarding the foregoing.

Yours truly,

Anne Wilson
Water Pollution Specialist

cc: Steve Harbicht (Head, Assessment & Monitoring, EPB)
Paula Pacholek (Assessment Coordinator, EPB)