



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

Your file - Votre référence
3BM-COR1521

Our file - Notre référence
GCDOCS#98727893

November 3, 2021

Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
sent via e-mail: licensing@nwb-oen.ca

Re: Crown-Indigenous Relations and Northern Affairs Canada's (CIRNAC's) Review of the Hamlet of Coral Harbour's Water Licence Renewal and Amendment Application for upgrade of existing Type "B" Water Licence No. 3BM-COR1521 to Type "A" Water Licence.

Dear Mr. Dwyer,

Thank you for your October 29, 2021 invitation to reply to the Government of Nunavut, Department of Community and Government Services (GN-CGS) response to CIRNAC's comments on the renewal and amendment application, submitted on behalf of the Hamlet of Coral Harbour, to upgrade its existing Type "B" Water Licence No. 3BM-COR1521 to Type "A" Water Licence.

CIRNAC Recommendation (R-01): Subject to the approval of the Board, CIRNAC recommends that in the interim, until a meter can be installed, that reporting the average monthly withdrawal is acceptable.

GN-CGS Response: Previously water consumption had been reported based on monthly water delivery billing records. Under the new license the water withdrawn from Post River to fill the raw water reservoir will be reported. A flowmeter is installed on this pump.

CIRNAC is satisfied with GN-CGS' response.



CIRNAC Recommendation (R-02): CIRNAC recommends that the licensee should:

- a) Clarify how they are producing monthly estimates;
- b) Update their solid waste disposal, operation and maintenance plan, and QA/QC plan to incorporate daily discharge monitoring methods which are actionable.

GN-CGS Response:

- a) Monthly estimates of sewage are based on billing records of delivered potable water. For all communities in Nunavut with trucked water and sewer services, delivered water is assumed to be equal to wastewater generation. This, along with projection formulas developed by the Government of Northwest Territories are used to estimate necessary capacity for capital wastewater projects.

For solid waste, generation can be estimated from per capita waste generation rates established from 2019 waste audits in neighboring municipalities or from an estimate of truck loads delivered in a typical week.

- b) OM plans will be updated with:
 - a description of how daily sewage discharge can be estimated from monthly water delivery records or from the GNWT formulas.
 - a description of how daily solid waste discharge can be estimated from per capita generation rates established from recent waste audits in nearby communities or from an estimate of average weekly truck delivery accounting for the collection truck's size.

Currently there are no daily discharge monitoring methods that are practical beyond estimates for most Nunavut municipalities. This is a community of 891 (Statistics Canada, 2016) with a single foreman managing all municipal operations.

CIRNAC is satisfied with GN-CGS' response.

CIRNAC Recommendation (R-05): CIRNAC recommends that the NWB should keep the licence condition requiring inspection of engineered facilities by a professional Engineer.

GN-CGS Response: The licensee is not requesting that CIRNAC inspect the facilities in an engineering capacity. A licensee representative will accompany the CIRNAC inspector during the annual inspections, typically a Technical Officer or the Kivalliq Municipal Engineer, who will conduct a concurrent inspection. However, this cannot always be an engineer since they may not be able to travel to Coral Harbour in July or August due to capacity issues. In these instances, engineers rely on Technical Officers for these inspections whose reports, along with all other reports, are reviewed by an engineer. The engineer then provides recommendations based on the available information.



For the sake of streamlining information the licensee is requesting that all engineering reports be submitted with the annual report by March of the following year rather than 60 days from the time of an inspection.

CIRNAC recommends that the NWB should keep the licence condition requiring inspection of engineered facilities by a professional Engineer. CIRNAC defers to the NWB's judgement to grant the Licensee's request that all engineering reports be submitted with the annual report by March of the following year rather than 60 days from the time of an inspection.

CIRNAC Recommendation (R-07): Recognizing concerns with Covid-19, CIRNAC defers to the NWB's judgement to decide the type of technical meeting (TM) / pre-hearing conference (PHC) for the Hamlet of Coral Harbour's Type "A" Water Licence application.

GN-CGS Response: The CGS Community Support Division is extremely short staffed at this time, in addition to recognizing concerns related to travel during the COVID-19 pandemic. Allowing written responses will allow our team to support the licensee most efficiently.

Recognizing concerns with Covid-19, CIRNAC defers to the NWB's judgement to decide the type of technical meeting (TM) / pre-hearing conference (PHC) for the Hamlet of Coral Harbour's Type "A" Water Licence application.

CIRNAC appreciates the opportunity to participate in this review. If there are any questions, please contact John Onita at (867) 975-3876 or Andrew Keim at (867) 975-4550 or andrew.keim@canada.ca

Sincerely,

John Onita,
Regional Water Coordinator