

October 31, 2023

Nunavut Water Board P.O. Box 119 Gjoa Haven, NU X0B 1L0

Attention: Robert Hunter, Licensing Administrator

RE: 3AM-COR2232 – Municipality of Coral Harbour – Response to CIRNAC's response to CGS's response to inquiries on the 2022 Annual Report for the Municipality of Coral Harbour's Water Licence No: 3AM-COR2232

Dear Mr. Hunter,

The Government of Nunavut Department of Community and Government Services (CGS), on behalf of the Municipality of Coral Harbour, has prepared the attached response to CIRNAC's response to CGS's response to inquiries on the 2022 Annual Report for Water Licence 3AM-COR2232 from the Municipality of Coral Harbour.

CGS will not be providing any further response beyond this correspondence on the 2022 Annual Report for Water Licence 3AM-COR2232. If additional comments are received, they will be taken into consideration for inclusion in the 2023 Annual Report for Water Licence 3AM-COR2232 from the Municipality of Coral Harbour.

Regards,

Megan Lusty

Manager, Municipal Works Government of Nunavut Community and Government Services

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CC:

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Agency	Number	Comment – September 7, 2023	Licensee Response
CIRNAC	01	CIRNAC thanks the GN for this response and considers this response satisfactory.	No further response required.
CIRNAC	02	CIRNAC is satisfied with the Response from the GN and looks forward to reviewing the 2023 Annual report.	No further response required.
CIRNAC	03	CIRNAC thanks the GN for this response and provides the following information. The Water license, a document that is vested in the sole authority of the Nunavut Water Board to issue or cancel pursuant to the Nunavut Land Claim Act and the Nunavut Water and Nunavut Surface Rights Tribunal Act requires the following; Part E: CONDITIONS APPLYING TO WASTE DISPOSAL AND MANAGEMENT 1. The Licensee shall direct all Sewage to the Sewage Disposal Facility or as otherwise directed by the Board. And, Schedule B of the License: Annual Reporting requirements The Annual Report referred to in Part B, Item 1, shall include the following: b. The daily, monthly and annual quantities in cubic meters of any Sewage discharged into the Sewage Containment Cell at Monitoring Station COR-2; In consideration of the above, it is clear that the necessity to provide this information in the Annual Report is a matter of compliance with the issued license. The license is clear that this is a requirement for reporting. Justification for such reporting requirements also is found within the legislation and in fact goes to the protection of the freshwater environment and aquatic life. CIRNAC looks forward to further engagement as required to assist the Government of Nunavut in maintaining compliance with the issued License.	Sewage quantities are conservatively measured based on water delivery billing records for all Municipalities with trucked sewage collections. Breakdown of daily, monthly and annual quantities will be included in future Annual Reports.

CIRNAC	04	CIRNAC accepts this response but would suggest that in future reporting that if no sludge removal activities were undertaken that there appears a statement to that effect in the Annual report. The Schedule B provided in the license has this requirement as C in the list.	Statement that no sludge removal to report will be added to future Annual Reports.
CIRNAC	05	CIRNAC thanks the GN for this response. If the GN requires assistance in locating or contacting suppliers they may consider contacting CIRNAC who can provide the name of labs that may also have stock that can be used.	Thank you for your offer of assistance. Please provide the Municipality of Coral Harbour with a list of laboratory contacts that have available stock that can be used in the future if another bottle shortage occurs.
CIRNAC	06	CIRNAC thanks the GN for this response. CIRNAC however is unclear, what have you added. We reviewed the updated annual report and O&M manual but failed to locate a page at the front of the plan that records updates and lists, in chronological order, what sections were updated, when they were updated and for what reason, and by whom. We look forward to that document being submitted as soon as this has been completed.	The June 30, 2021 Operation and Maintenance plan was a new document, following the standardized Operation and Maintenance Plan template for Solid Waste Disposal Facilities. Future updates of this Operation and Maintenance Plan will include a tracking page. Previous reference reports (2010, 2002) were identified in section 10.0.
CIRNAC	07	CIRNAC appreciates the response provided by the GN. CIRNAC continues to look forward to working with the GN to address these deficiencies and to cooperatively engage on solutions to maintaining and inspecting the infrastructure throughout the Territory. CIRNAC continues to offer what support we can through our Field Operations Unit to facilitate inspections of facilities and through the Waters Unit to address reporting and compliance issues.	No further response required.