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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

Licence No: **3AM-COR2232**

December 11, 2023

Leonie Pameolik
Senior Administrative Officer (SAO)
Municipality of Coral Harbour
P.O. Box 30
Coral Harbour, Nunavut X0C 0C0

Megan Lusty
Manager, Municipal Works
Government of Nunavut, CGS
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Email: sao@coralharbour.ca

Email: mlusty@gov.nu.ca

RE: NWB Technical Review of 2022 Annual Report for the Municipal Water Licence No: 3AM-COR2232 for the Municipality of Coral Harbour

Dear Ms. Pameolik and Ms. Lusty,

The Nunavut Water Board (NWB or Board) has completed a technical review of the 2022 Annual Report submission for the above stated Water Licence. On March 30, 2023, the Board acknowledged receipt of the 2022 Annual Report, and provided them to the Kivalliq distribution list for information. Information requests were received from Crown-Indigenous Relations and Northern Affairs (CIRNAC) on June 24, 2023, with follow-ups on September 7, 2023 and November 10, 2023. The Licensee provided responses on August 28, 2023 and October 31, 2023. Two of CIRNAC's information requests remain unresolved. The Licensee, on November 22, 2023, has requested an extension until March 31, 2024 to respond.

Environment and Climate Change Canada (ECCC) requested information on June 23, 2023. The Licensee responded on August 28, 2023. ECCC responded on September 8, 2023 stating that the Licensee's response was satisfactory.

The table below summarizes the comments received:

Crown-Indigenous Relations and Northern Affairs		
#	Comment	GN-CGS response
1	CIRNAC recommended the Licensee to provide the origin of all the undefined sources of water tabulated in Table 1, and clarify why the annual total of water obtained from all sources in Table 1 was more than the total of water removed from Post River in Table 2.	The reservoir can hold over 54,000 m ³ and was not fully empty from the previous year. Thus only 28,000 m ³ was pumped from Post River. There was a labelling error. Updated Annual Report submitted.

2	CIRNAC recommends that in the 2022 Annual Report, the Government of Nunavut include the daily quantities of water withdrawn from the Post River, and specify if any daily rates exceeded 2,000 m ³ .	The Licensee stated that there is currently no flow meter to record daily flow and that this will be rectified.
3	CIRNAC recommends the Government of Nunavut devise a reporting system for measuring the quantity of sewage discharged into the Sewage Containment Cell.	The Licensee requested clarification from CIRNAC about what daily sewage discharge reporting is needed for.
	Follow-up: CIRNAC explained Licence conditions requiring the information requested. (This information request remains unresolved)	The Licensee stated that breakdown of daily, monthly and annual quantities of sewage discharged into the Sewage Containment Cell, will be included in future Annual Reports.
4	CIRNAC recommends the Licensee specify where the 2022 sludge removal quantities are reported.	The Licensee stated there is no sludge removal reporting. Planning to upgrade the wastewater treatment facility is underway. If budget is approved, a sewage remediation plan will be developed and submitted to NWB.
5	CIRNAC recommends the Licensee submit the analytical results of the water quality monitoring station and grab samples in the 2022 Annual Report or specify that none were collected in 2022. CIRNAC recommends the Licensee provide a summary report for COR-5 and all grab samples compared to effluent quality limits in the 2022 Annual Report, and specify if there were any exceedances.	The Licensee responded that there was a bottle shortage and therefore no sampling was done in 2022. A sentence has been added (in the revised Annual Report). Sampling season for 2023 has not been affected.
6	CIRNAC recommends that the updated Operation and Maintenance Plan be submitted with the 2022 Annual Report. CIRNAC recommends that the Licensee add 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; to allow for easier detection of the changes that have been made.	The Licensee stated that this has been added in the revised Annual Report.

	<p>Follow-up: CIRNAC was unable to find the information requested.</p> <p>(This information request remains unresolved)</p>	<p>The Licensee stated that 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.</p>
	<p>Follow-up (Nov 10, 2023): CIRNAC recommends the Licensee include details on the runoff diversion berm inspection and maintenance in the June 30, 2021 O&M Plan. CIRNAC also recommends adding details on the hazardous waste storage procedures and protocols, including for contaminated soils storage and when secondary containment is required.</p>	<p>No response received. The Licensee requested an extension to March 31, 2024 to respond.</p>
7	<p>CIRNAC recommends the Licensee submit the 2022 Engineer's report for the structural integrity of the Sewage Disposal Facility, as well as a status update on the stated requirements enumerated within the September 16, 2021 water licence inspection.</p>	<p>The Licensee stated that a study is currently being undertaken to determine the category of structure, the appropriate personnel to undertake the inspection, and the required frequency of inspection. This report is expected to be submitted to CIRNAC in 2024.</p>

While the Board acknowledges that the Licensee committed to provide additional information/clarification within the 2024 Annual Report the Board would like to highlight that Licence terms and conditions shall be fully met by the Licensee (i.e. sampling or monitoring prescribed under Licence, engineering infrastructure's annual inspections etc.). The NWB strongly recommends to address all unresolved comments submitted by CIRNA and ECCC on the issues identified along with the 2023 Annual Report information. This information is attached for your consideration¹.

Should you have any questions, please feel free to contact the undersigned at (867) 360-6338 (extension 33) or ali.shaikh@nwb-oen.ca, at your earliest convenience.



Mohammad Ali Shaikh
Nunavut Water Board,
Technical Advisor

¹ Crown Indigenous Relations and Northern Affairs Canada (CIRNA), June 24, 2023, Environment and Climate Change Canada (ECCC), June 23, 2023.

Enclosure: Comments – CIRNA, ECCC

Cc: Distribution List – Kivalliq