



September 11, 2014

*Your file - Votre référence*  
3BM-IGL0911

*Our file - Notre référence*  
IQALUIT-#849458

Robin Ikkutisluk  
Licence Administrator Assistant  
Nunavut Water Board  
GJOA HAVEN, NU X0E 1J0

**Re: Aboriginal Affairs and Northern Development Canada Review of the Hamlet of Igloolik's  
Application to Renew Water Licence #3BM-IGL0911**

Dear Ms. Ikkutisluk:

Thank you for your email of August 8, 2014, concerning the above mentioned application. A memorandum is provided for the Board's consideration. Comments and recommendations have been provided pursuant to Aboriginal Affairs and Northern Development Canada's mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

Please do not hesitate to contact me by telephone at 867-975-4555 or email at [david.abernethy@aandc-aadnc.gc.ca](mailto:david.abernethy@aandc-aadnc.gc.ca) for further information.

Sincerely,

David Abernethy  
Regional Coordinator  
Water Resources Division  
Resource Management Directorate  
Aboriginal Affairs and Northern Development Canada  
IQALUIT, NU X0A 0H0

Encl.

c.c.: Murray Ball, Manager of Water Resources, AANDC Nunavut  
Erik Allain, Manager of Field Operations, AANDC Nunavut

# Memorandum

To: Robin Ikkutisluk, Nunavut Water Board

From: David Abernethy, Aboriginal Affairs and Northern Development Canada

CC: Murray Ball (AANDC), Erik Allain (AANDC)

Date: September 11, 2014

**Re: Water Licence Renewal Application, #3BM-IGL0911**

Licensee: Hamlet of Igloolik  
Project: Municipal water licence  
Region: Qikiqtani

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## Comments:

### A. Background

On August 12, 2014, the Nunavut Water Board (**NWB**) provided notification of the Hamlet of Igloolik's (**the "Licensee"**) application to renew Water Licence #3BM-IGL0911. This licence authorizes the use of water and deposit of waste for municipal undertakings. Mr. Bhabesh Roy, Municipal Planning Engineer, Community Government Services, Government of Nunavut, submitted this application on behalf of the Hamlet of Igloolik.

Interested parties were asked to review this application and provide comments by September 12, 2014.

## B. Results of review

On behalf of Aboriginal Affairs and Northern Development Canada (AANDC), the following comments and recommendations are provided:

Item	Reference	Issue	Comment	Recommendation
1.	140313 3BM-IGL0911 IGLOOLIK WATER LICENSE APPLICATION TO NWB 2014-IMLE	Renewal term	The Licensee is requesting a ten year licence renewal term from the licence's August 1, 2011 expiry date (i.e., renew up to August 2, 2021). A ten year licence renewal is not preferred due to the benefits of regularly assessing municipal water and waste management practices.	The Licence should be renewed for no more than five years.
2.	140313 3BM-IGL0911 IGLOOLIK WATER LICENSE APPLICATION TO NWB 2014-IMLE  140313 3BM-IGL0911 TECHNICAL SUMMARY ENVIRONMENTAL FACILITIES-IMLE	Planned municipal infrastructure construction activities	The Licensee has stated that it will construct a new sewage lagoon, waste disposal facility, and expand its water reservoir once it secures the necessary capital funding. It has also confirmed that consulting firms have been acquired to design and oversee the construction of these infrastructure upgrades. The Licensee intends to provide as-built drawings and Operation and Maintenance Plans following the construction of this new / upgraded infrastructure.	<p>The NWB should require that the Licensee apply for a licence amendment to allow for the construction of a new sewage lagoon, waste disposal facility, and expanded water reservoir. This application should include the following documentation:</p> <ul style="list-style-type: none"> <li>• construction design drawings stamped by a qualified engineer registered in Nunavut;</li> <li>• Operation and Maintenance Plans specific to each facility prepared in accordance with the Government of the Northwest Territories 1996 guidelines titled, "<i>Guidelines for the Preparation of an Operation and Maintenance Manual for Sewage and Solid Waste Disposal Facilities in the Northwest Territories</i>"; and</li> <li>• Abandonment and Reclamation Plans for facilities that will be abandoned pursuant to Part G, Item 1 of the Licence.</li> </ul> <p>There should be no construction of new</p>

Item	Reference	Issue	Comment	Recommendation
				infrastructure or expansion of existing facilities until the licence has been amended.
3.	090710 3BM-IGL0911 Licence Renewal-OT2E.pdf  140516 3BM-IGL0911 CGS LETTER TO NWB FOR IGLOOLIK MAY 2014-ILAE	Operation and Maintenance Plans for existing water and waste management facilities	The Licensee does not have up to date Operation and Maintenance Plans for its water and waste management facilities as required by Part F, item 1 of its licence. It appears that the Licensee intends to continue operating these facilities without providing these plans. However, the Licensee has stated that it will provide Operation and Maintenance Plans for newly constructed and expanded facilities following construction activities.	The Licensee should provide Operation and Maintenance Plans, along with a Spill Contingency Plan and Monitoring Program Quality Assurance/ Quality Control Plan for its existing water and waste management facilities pursuant to Part F, Item 1 of its licence. These plans should be subsequently revised to reflect changes that will result from the construction of new facilities and any facility upgrades.
4.	140516 3BM-IGL0911 CGS LETTER TO NWB FOR IGLOOLIK MAY 2014-ILAE	Annual inspections of water and waste management facilities	Although a licence amendment has not been requested, the Licensee has indicated that it wants to allow Government of Nunavut Regional Municipal Planning Engineers to perform annual inspections (July or August) of engineered water and waste management facilities rather than Geotechnical Engineers as is currently required by Part F, Item 3 of the licence. Applicable facilities include the water reservoir, sewage lagoon, and any diversion berms and collection ponds.  More stringent inspection requirements (e.g., Geotechnical Engineer inspections) can be applied if it is determined that infrastructure pose high environmental and/or health and safety risks.	It would be reasonable to amend Part F, Item 3 of the licence to allow Government of Nunavut Regional Municipal Planning Engineers to perform annual inspections (July or August) of engineered water and waste management facilities rather than Geotechnical Engineers. If this is acceptable to the NWB, the licence should be amended accordingly.  The Licensee must ensure that it will provide annual engineer reports within 60 days of inspections, including a cover letter outlining an implementation plan addressing each of the Engineer's recommendations. To date, no reports or cover letters have been provided.

Item	Reference	Issue	Comment	Recommendation
5.	2011 – 2013 Annual Reports	Annual reporting information requirements	<p>The Licensee has provided annual reports for the years 2011 through 2013 (2009 report not provided). Although these reports provide useful information, the reporting requirements specified in Part B, Item 1 of the Licence are not being fully satisfied. The following observations describe how future annual reports can be improved:</p> <ul style="list-style-type: none"> <li>a) The NWB's Annual Reporting template should not be relied on as the source for documenting reporting requirements because it is not specific to individual licences. This template can be completed but should be supplemented by additional documentation to ensure that all monitoring requirements are satisfied. The Licensee is encouraged to develop its own annual reporting template;</li> <li>b) The submitted reports do not provide tabular summaries of data that should be collected under the licensed monitoring program pursuant to Part B, Item 1 (a) of the Licence. Monitoring data other than the volume of potable water consumption and estimated treated sewage effluent is provided in the form of water quality laboratory analysis reports that do not reference</li> </ul>	The Licensee must ensure that its annual reports satisfy licence requirements. The Licensee should not hesitate to contact AANDC, the NWB, or the Government of Nunavut's Department of Community and Government Services to discuss its licensed monitoring program.

Item	Reference	Issue	Comment	Recommendation
			<p>licensed monitoring stations. Tabular summaries should be provided for all monitoring program stations in addition to laboratory analysis reports. These summaries should reference licensed monitoring program stations (e.g., IGL-X), effluent quality limits, and any exceedances; and</p> <p>c) Written responses to Inspection reports should be attached to annual report submissions.</p>	

Prepared by David Abernethy