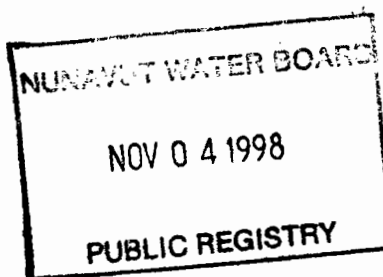


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Name: Dionne Filiatrault
Organization: Nunavut Water Board
Fax: 867-360-6369
From: Paul Smith
Date: November 4, 1998
Subject: Pelly Bay and Igloolik licences (NWB3PEL9803 & NWB3IGL9803)
Pages: 1

Dionne,

I have received and reviewed the Pelly Bay and Igloolik municipal licences. There are a couple of observations worth noting at this time.

First, for both licences, there are clauses that relate to notifying the inspector prior to initiating decant of the lagoon. In both Pelly and Igloolik, the sewage lagoons were built with permeable berms (i.e. no valve structure - completely weather dependent). These are clauses that the Licensee can not meet as there is no conscious decision made when decanting will begin. The list of parameters also seems somewhat excessive for sewage effluent. There is no industrial activity in either of these communities, and as such I am unsure what justification there is for all of these parameters.

Second, and again for both licences, sampling requirements for raw water supplies are required. In the 'General Considerations' portion dealing with the SNP, it is stated that for reasons of public health that a monitoring program is necessary. This is the jurisdiction of GNWT Public Health, not the NWB. As such, requiring the Licensee to monitor raw water will mean that the Hamlet's will have to incur costs associated with sampling and analysis that otherwise they should not have to. In addition, within both licences, Part C, Item 2 requires the Licensee to meet sampling requirements as set out in the SNP. There are no sampling requirements for raw water in the SNP.

Thirdly, in the SNP of the Pelly Bay licence, station PEL-2 describes leachate from the dump (if present). Does that mean that if there is no leachate, then this site does not exist? I understand why you have worded it this way (because they have a diversion ditch), but SNP, Part B, Item 1 states that leachate shall be sampled during periods of flow. This implies that if there is no flow, that no sampling is required.

Lastly, in the Igloolik licence, at station IGL-3, 'Conductivity (lower than ocean)' must be collected. What is this?


Paul Smith
Water Resources Officer