Environmental Protection Operations Directorate Prairie & Northern Region 5019 52<sup>nd</sup> Street, 4<sup>th</sup> Floor P.O. Box 2310 Yellowknife, NT X1A 2P7

ECCC File: 6200 000 009/008 NWB File: 3AM-IGL2131



June 29, 2023

via email at: licensing@nwb-oen.ca

Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0

Dear Richard Dwyer:

RE: 3AM-IGL2131 – Government of Nunavut Department of Community and Government Services (GN-CGS) – Hamlet of Igloolik Type A Water Licence – Annual Water Licence Report

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above-mentioned annual water licence report.

ECCC provides expert information and knowledge to project assessments on subjects within the department's mandate, including climate change, air quality, water quality, biodiversity, environmental preparedness and emergencies. This work includes reviewing proponent characterization of environmental effects and mitigation measures, and providing advice to decision makers on activities needed to mitigate these environmental effects. Any comments received from ECCC in this context does not relieve the proponent of its obligations to respect all applicable federal legislation.

The following comments are provided:

### 1. Topic: Surveillance Network Program (SNP) Monitoring Data

# Reference(s)

Appendix A: IGL-4, IGL-5 Effluent Quality Limits

#### Comment

Appendix A is listed as "IGL-4, IGL-5 Effluent Quality Limits", however, the tables provided in this Appendix are described as "IGLK-3-1 Cell #3" and "IGLK-3-1 Cell #2". ECCC notes that as per the water licence, IGL-3 is a station established to monitor the volume of sewage that is deposited into the lagoon and is not a sampling station that is associated with





characterization of effluent quality. It is unclear whether samples have been incorrectly labelled. Monitoring results should be presented with the corresponding SNP station as described in the Licence.

#### ECCC Recommendation

ECCC recommends GN-CGS clarify the location (SNP station) for the monitoring results provided in Appendix A of the annual report.

## 2. Topic: Surveillance Network Program (SNP) Monitoring Data

### Reference(s)

2022 Igloolik Annual Report

#### Comment

Monitoring data has been provided for IGLK-3-1 on August 11, 2022, but no other monitoring data is included in the annual report. As per the water licence, water quality monitoring data would be expected when flow is observed from IGL-2 (runoff from the solid waste disposal facility), monthly from IGL-4 (final effluent control points from the sewage disposal facility), and when flow is observed from IGL-5 (final effluent discharge point prior to entering Foxe Basin). No rationale has been provided on why this monitoring data is not included in the annual report.

#### **ECCC** Recommendation

ECCC recommends GN-CGS provide a description of overall monitoring completed in 2022, including, whether sampling occurred at IGL-2, IGL-4, and IGL-5. If monitoring did not occur, rationale should be provided. If monitoring did occur, results should be provided.

### 3. Topic: Inspection in 2022

#### Reference(s)

Appendix D: Igloolik 2022 CIRNAC Inspection Report

### Comment

Appendix D is listed as "Igloolik 2022 CIRNAC Inspection Report". However, Appendix D states, "no CIRNAC inspection in 2021." It is unclear whether this is a typographical error, and the text should read "2022" or whether the 2022 inspection report has been erroneously excluded from the report.

## ECCC Recommendation

ECCC recommends GN-CGS clarify whether a CIRNAC inspection occurred in 2022, and if so, provide the report.

# 4. Topic: Quality Assurance/Quality Control (QA/QC) Samples

## Reference(s)

- 2022 Igloolik Annual Report
- 2020 Quality Assurance / Quality Control Program
  - Section 4.1.1 Quality Control Samples

#### Comment

Certificates of analysis are provided, however there does not appear to be any associated QA/QC samples collected in 2022. As per the QA/QC Program, field blanks, duplicates, equipment blanks, and trip blanks are to be utilized to assess the quality of the data produced.

### ECCC Recommendation

ECCC recommends GN-CGS describe the QA/QC procedures/sampling that were included during the 2022 sample collection. If QA/QC was not included, provide rationale for exclusion and a description of how omissions of QA/QC will be prevented in future sampling.

If you need more information, please contact Abigayle Blackmore at 780-239-3894 or Abigayle.Blackmore@ec.gc.ca.

Sincerely,

[original signed by]

Abigayle Blackmore Environmental Assessment Officer

cc: Melissa Pinto, Acting Head, Environmental Assessment North (NT and NU)