

**Part E – Item 3:** The effluent criteria for the discharge of the wastewater treatment plant currently would put the City of Iqaluit in non-compliance if adopted as presented due to the fact the current phase of the sewage treatment plant will not meet the effluent criteria listed. It is the City’s recommendation that Item 3A be rewritten to allow the effluent criteria included to govern the primary treatment plant or the condition be reworded as follows:

"All discharges by the Licencee from the wastewater treatment plant at monitoring Station Number IQA-02, shall upon commissioning of Phase 2 of the project, comply with the following effluent criteria:"

**Part E – Item 4:** Similar to Part E – Item 3, the City of Iqaluit would propose the following rewording "Undiluted effluent shall be non-acutely toxic, upon commissioning of Phase 2 of the wastewater treatment plant..."

**Part E – Item 7:** A final assessment of the sludge management pilot project is not possible within the timeline proposed. The statement should be revised to "The Licencee shall submit to the board for approval periodic reports on the performance of the sludge management pilot project and a final assessment of the sludge management pilot project by June 30, 2007. This timeline will allow for the complete assessment to be made rather than a progress report.

**Part E – Item 15:** There does not appear to be any date for compliance tied to this condition.

**Part E – Item 16:** "The licensee shall collect and contain all leachate within the West 40 Landfill" – this is not possible given the landfill site does not have an impermeable liner. The City recommends the statement be revised as follows: "The licensee shall collect and contain all surface runoff from within the West 40 landfill, and shall divert away from the landfill all surface runoff that originates outside the landfill site."

**Part E – Item 17:** The requirement to provide ninety days notice to a proposed release, discharge or transfer of leachate seems excessive as it will require a new leachate retention pond to be excessively large and may limit the City's ability to operate a facility. The City would suggest a much shorter period of 5 to 10 days.

## **PART F: CONDITIONS APPLYING TO CONSTRUCTION**

**Part F – Item 8:** It is the City understanding that the design drawings for the Lake Geraldine Raw Water Storage Phase II have been submitted to the board previously.

**Part F – Item 9:** The requirement to complete the Dam Safety Review on the Lake Geraldine Raw Water Storage Upgrade Phase II to be completed by October 31, 2006, may be an early target date, as the works may not be fully completed at that time. The City of Iqaluit is recommending that this date be changed to within thirty days upon substantial completion of the Lake Geraldine Raw Water Storage Upgrade Phase II.

**Part F – Item 10:** The City would suggest a timeline of 60 days would be more reasonable.

**Part F – Item 11:** The City would suggest a timeline of more than 30 days would be more reasonable.

**Part F – Item 12:** the scope of the submission should be “operation and maintenance documentation” not “final design” for the sludge management facility.

#### **PART J: CONDITIONS APPLYING TO ABANDONMENT AND RESTORATION**

**Part J – Item 1:** The requirement for the preparation of an Abandonment and Restoration Plan for the West 40 Landfill Site within ninety days of the effective date of the licence may be an onerous task. The City is requesting additional time be made available for this task and/or the condition being changed to read, “Draft Conceptual Abandonment and Restoration Plan”. In addition, the reference to the West 40 Landfill Site should be clarified to ensure it only applies to the existing facility, and does not include the expansion facility.

**Part J – Item 6:** This point reads as the implementation of the Abandonment and Restoration Plan for the West 40 Landfill Site upon its approval. This may be taken to mean that the site would have to be abandoned and restoration begins upon the approval of the Board. The City of Iqaluit is requesting the word implementation be replaced with adopted.

#### **MONITORING CRITERIA FOR SLUDGE MANAGEMENT PROGRAM**

The water quality monitoring criteria for the Phase 1 Sludge does not appear reasonable given the solids content is approaching 20 percent, as well, the frequency of the sludge monitoring should be consistent with the sludge management program as nine months of the year the sludge will be frozen.

It is the City’s opinion and recommendation that the monitoring criteria for the Phase 1 sludge be moisture, biological (limited to coliforms per gram), ICP metals (concentration per gram), and nutrients (nitrogen and phosphorus). The City further recommends the frequency of testing be on an annual basis. Additional monitoring criteria should also be required for any processed sludge and should include the same parameters as the unprocessed sludge, tested annually.

The initial sampling completed in March of 2006 indicated the sludge was of a high quality in terms of solids and metal concentrations.

#### **CONCLUSION**

Section 43(1)(b) of the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* states:

43. (1) Subject to this Act, the Board may

(a) on application by the licensee, renew a licence, with or without changes to the conditions of the licence;

(b) amend, for a specified term or otherwise, any condition of a licence

- (i) on application by the licensee,
- (ii) to deal with a water shortage, or
- (iii) where the Board considers the amendment to be in the public interest; and

Further to this, Section 49 the *Act* states:

49. The Board may delegate to its chief administrative officer the power

- (a) to issue, amend, renew or cancel a licence in relation to which no public hearing is required; and
- (b) to authorize, in accordance with subsection 44(2), the assignment of a licence.

The City is hereby requesting the licence conditions referenced above be considered for amendment prior to approval of the licence by the Minister of Indian and Northern Affairs Canada.

We trust the above comments and concerns will be of assistance to you in the City's request for an amendment to the conditions of Water Licence 3AM-IQA0611. Should you require anything further, or require any clarification or explanation of the comments and concerns of the City contained in this correspondence, please do not hesitate to contact any of the undersigned.

Best Regards,



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City of Iqaluit



John Hussey  
Acting/Chief Administrative Officer  
City of Iqaluit

c.c. Jim Rogers, Manager, Water Resources, Indian and Northern Affairs Canada