



ᐃᖃᓗᐃᑦ ᓄᓇᑦᑕᓄᓂᖃᖃᑦ

ᑎᑎᖃᖃᓄᐃᖅ 460

ᐃᖃᓗᐃᑦ ᓄᓇᓂᖃᑦ

X0A 0H0

ᓄᖃᑕᓄᓂᖃᖃᑦ (867)

79-5600

ᓂᖃᑦᓄᓂᖃᑦ (867) 979-5922

City of Iqaluit

Box 460

Iqaluit, Nunavut

X0A 0H0

Phone (867) 979-5600

Fax (867) 979-5922

Ville d'Iqaluit

C.P. 460

Iqaluit, Nunavut

X0A 0H0

Tél. (867) 979-5600

Télécop. (867) 979-5922

admin@city.iqaluit.nu.ca

www.iqaluit.nu.ca

October 22, 2006

Mr. Phillip di Pizzo
Executive Director
Nunavut Water Board
P.O. Box 119
Gjoa Haven, Nunavut
X0B 1J0

Re: City of Iqaluit Water Licence 3AM-IQA0611

Dear Mr. di Pizzo:

The following letter is written in support of the City of Iqaluit's Water Licence amendment application. For clarity and ease of review the numbering used corresponds directly to the City's Water Licence.

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

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;

Further to this, Section 49 (a) 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.

The City of Iqaluit received official approval of its Water Licence (3AM-IQA0611) on July 25, 2006 from the Minister of Indian and Northern Affairs. The effective date of the licence is May 15, 2006.

The City is requesting a formal amendment of certain conditions in the Licence taking into account the following comments and concerns.

PART D: CONDITIONS APPLYING TO WATER USE AND WATER MANAGEMENT PLANS

Part D – Item 3: It is our understanding that the Department of Fisheries and Oceans (DFO) has determined Lake Geraldine to be a non fish bearing waterway, therefore there should not be a requirement to equip the water intake of Lake Geraldine Dam with a screen to prevent the entrainment of fish.

Part D – Item 4: As per the previous point, it is our understanding that DFO does not consider Lake Geraldine to be a fish bearing waterway, and therefore we do not feel that there should be a limitation on the rate of withdrawal of water as it is intended to prevent fish from becoming impinged on the screen.

PART E: CONDITIONS APPLYING TO WASTE DISPOSAL AND WASTE MANAGEMENT PLANS

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 5: Discharges from the Sewage Lagoon shall require authorization from an Inspector in accordance with Part E, Item 20 and 21. There does not appear to be a Part E, Item 20 and 21.

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 sixty 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 - 90 days would be more reasonable.

Part F – Item 11: The City would suggest a timeline of 60 - 90 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

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

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

Best Regards,



Geoff Baker, C.E.T.
Manager, Engineering Services
City of Iqaluit

C.c. Jim Rogers, Manager, Water Resources, Indian and Northern Affairs Canada
Andrew Keim, Water Resource Officer, Indian and Northern Affairs Canada
Clinton Mauthe, CAO, City of Iqaluit
Elisapee Sheutiapik, Mayor, City of Iqaluit
Mark Hall, Director of Public Works, City of Iqaluit