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November 13, 2015

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board

Re: City of Iqaluit's Response to Stakeholders Submission 150415 3AM-IQA0612 EC Letter of Comment-ILAE

Dear Ms. Beaulieu:

In support of the City of Iqaluit's (City) water licence renewal application, please accept the following letter as the response to the submission from Environment Canada reference 150415 3AM-IQA0612 EC Letter of Comment-ILAE, dated April 15th, 2015.

Requests for Information

1. Wastewater Management Plan, which includes but is not limited to:

- Current wastewater management practices and facilities;
- Future plans for wastewater management;
- Effluent and water quality monitoring, and
- Adaptive management.

Response: The City does not believe that the preparation of a Wastewater Management Plan would provide any measurable benefit to the City or the NWB. The City has started the process for upgrading the Wastewater Treatment plant and has already prepared a feasibility study which has been accepted by Council. Implementation of the plan is awaiting funding.

The City has submitted with its application the design drawings and the O&M Manual for the existing facility which documents the existing operations. The City has initiated a project to upgrade the wastewater treatment facility. A copy of the feasibility study is submitted with the City response. As part of the water licence renewal package, the City has submitted the results of the monitoring program within the City's water licence. The City believes it has submitted the information requested.

2. Closure plans for the Waste Water Treatment Facility and Sewage Lagoon

Response: The City has no plans to decommission either the Wastewater Treatment Plant or the Sewage Lagoon, therefore development of a closure plan for these facilities would be premature. We suggest the following clause be added to allow the water licence to manage the potential closure of any facility.

"The Licensee shall submit to the Board for approval an Abandonment and Restoration Plan at least six (6) months prior to abandoning any facilities or upon submission of the final design drawings for the construction of new facilities to replace existing ones. Where applicable, the Plan shall include information on the following:

- a. water intake facilities;
- b. the water treatment and waste disposal sites and facilities;
- c. leachate prevention;
- d. an implementation schedule;

- e. maps delineating site facilities;
- f. consideration of altered drainage patterns, and
- g. a proposal identifying measures by which restoration costs will be financed by the Licensee upon abandonment related to water use, waste deposit to water, or appurtenant undertakings related to water use and/or deposit of waste to water, subject to the act and regulations.

3. In reviewing the water licence application documents, there was no mention of using the following waste management practices:

- Open burning;
- Incineration, and
- Land farming.

However, if any of these practices will be used, then the appropriate management plan(s) should be provided.

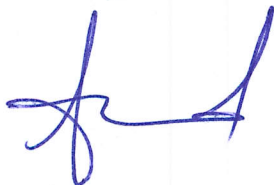
Response: The City is reducing its wood waste through the use of a burn box to increase capacity in the existing facility. After this one time occurrence the City does not foresee open burning or use of a burn box in its operations under the new water licence.

The Solid Waste Management Plan stated that a study regarding incineration technologies will be prepared for the Council. The Study is ongoing and no decision has been made. The study will be made available to the NWB upon its completion.

The City has no plans to operate a landfarm. There are privately owned landfarms in Iqaluit which the City would utilize to manage any contaminated waste that is generated.

If you have any questions or require further information or clarification, please contact Matthew Hamp, Director of Public Works and Engineering at 867-979-5653.

Sincerely,



Muhamud Hassan
Chief Administrative Officer
City of Iqaluit