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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI

November 30th, 2006

File: 3AM-IQA0611
By Email: g.baker@city.iqaluit.nu.ca

Geoff Baker
Manager, Engineering Services
City of Iqaluit
Box 460
Iqaluit, NU X0A 0H0

Subject: NWB Response to Amendment Application

Dear Mr. Baker,

The NWB had received your report (dated October 22nd, 2006) on November 9th, 2006 that requests an amendment to water licence 3AM-IQA0611. The contents of your report include references to the *Nunavut Waters and Nunavut Surface Tribunal Act (NWANSRTA)* and amendment requests to particular terms and conditions set in 3AM-IQA0611. After considering the contents contained in your report the NWB has deemed the application material incomplete due to lack of evidence and/or developed discussion for licence term/condition recommendations brought forward.

The NWB would like to remind the City of Iqaluit that according to **Section 8.2** of the *Regulations* a *Type A* Licence is required for one or more uses of water or deposits of waste set out in Column I of **Schedule VI** where any one of those uses or deposits meets a criterion set out in Column IV thereof. A *Type A* Licence is required as the City of Iqaluit exceeds the population limit of 2000 persons set for the deposit of waste by means of a treatment system. Thus, as per **Section 52 (1(a))** of the *NWANSRTA*, a public hearing shall be held by the Board as the licence amendment application is classified as *Type A* by the *Regulations*.

The NWB would like to highlight and briefly comment on suggested amendments to **Part E, Item 3, Part E, Item 4, Part E, Item 16, Part E, Item 17**, and **Monitoring Criteria**.

- a. **Part E, Item 3, and Part E, Item 4** – Reasons, evidence, and detailed discussion may be provided to support the proposed amendments to conditions related to sewage effluent discharge criteria. An assessment of impact to 'Waters' (as defined by the *NWANSRTA*), through the applied waste stream, may assist in demonstrating reasons to consider the amendment.
- b. **Part E, Item 16** – The City of Iqaluit may demonstrate how solid wastes and associated runoffs (surface and subsurface) are managed and that a containment of these wastes exists if the Board is to consider the amendment proposal. The NWB would like to remind the City of Iqaluit that the West 40 Landfill site has not undergone Abandonment and Restoration and hence is still in operation.
- c. **Part E, Item 17** – The City of Iqaluit may demonstrate how the timelines set in the proposed amendment adequately manage, through the understanding and characterization of the site specific waste stream (spatial and temporal dimensions), loading on 'Waters' (as defined by the *NWANSRTA*) and its potential and anticipated impact.
- d. **Monitoring Criteria** – The City may provide a technical opinion, through an appropriately qualified engineer practiced in the opinions presented, that discusses the propositions set in the amendment report. This will allow discussion to be generated where Regulatory and Board recommendation may be developed.

The NWB welcomes any inquiry the City of Iqaluit may have to develop additional application materials that communicate evidence and develop detailed discussion to support recommendations listed in the amendment application report.

If you require guidance with the additional application materials to submit or have any questions whatsoever please feel free to contact Joe Murdock, Director of Technical Services at telephone number 867.360.6338, mobile number 867.445.3924, or email dirts@nunavutwaterboard.org .

Regards,

Original signed by:

Philippe di Pizzo
Executive Director