



September 27, 2013

Sean Joseph
Technical Advisor
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU
X0B 1J0
Email: sjoseph@nunavutwaterboard.org

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ᐅᖅᐱᓂᓂᓂ (867) 979-5666

ᓕᓂᓂᓂᓂ (867) 979-5922

City of Iqaluit

Box 460

Iqaluit, Nunavut

X0A 0H0

Phone (867) 979-5666

Fax (867) 979-5922

Ville d'Iqaluit

C.P. 460

Iqaluit, Nunavut

X0A 0H0

Tél. (867) 979-5666

Télécop. (867) 979-5922

j.hussey@city.iqaluit.nu.ca

www.iqaluit.nu.ca

Re: City of Iqaluit License No. 3AM-IQA0611 Renewal Application Addendum

Dear Mr. Joseph,

As per the recommendation in your July 8, 2013 letter, the City wishes to officially withdraw its Amendment No. 1 Application submitted to the Nunavut Water Board on November 9, 2006 and would like to carry forward several items from that application to its current Water License Renewal Application. The items to be carried forward are summarized in Table 1 below.

Table 1. Summary of Amendment No. 1 items to be carried forward to the current Water License Application Renewal Application

Terms and Conditions	Reason for Amendment Request	Requested Amendment
Part E, Item 3(b)	These effluent discharge criteria cannot be met at monitoring Station Number IQA-02 until the wastewater treatment plant is upgraded to a secondary treatment facility. This Phase 2 upgrade is scheduled to be completed at the end of 2018.	Clarify that this item will apply after the Phase 2 (secondary treatment) upgrade is commissioned: "All discharges by the Licensee from the wastewater treatment plant at monitoring Station Number IQA-02 shall, upon commissioning of Phase 2 of the wastewater treatment plant upgrade project, comply with the following effluent criteria:"*
Part E, Item 4	The City cannot comply with this item until the Phase 2 (secondary treatment) upgrade to the WWTP is commissioned.	Clarify that this item will apply after the Phase 2 upgrade is commissioned: "Undiluted Effluent shall,

	The Phase 2 upgrade is scheduled to be completed at the end of 2018.	upon commissioning of Phase 2 of the wastewater treatment plant upgrade project, be non-acutely toxic under the “Rainbow Trout ...”*
Part E, Item 5	Refers to Part E, Items 20 and 21, which do not exist.	Correct typo and replace “Item 20 and 21” with “Item 18 and 19”.
Part E, Item 16	This item states that “the licensee shall collect and contain all leachate within the West 40 Landfill.” This is not possible because the landfill site is not built on an impermeable liner.	Reword as follows: “the licensee shall use berms and on-site detention ponds to collect and manage all surface runoff from within the West 40 landfill and ensure that it does not come into contact with clean surface water originating from outside landfill”.*
Part J, Item 6	This item could be taken to mean that abandonment and restoration would be expected to begin upon the plan’s approval of the Board. This is not accurate, as the timing will be dependent on the closure of the West 40 Landfill.	Replace the word “implement” with “adopt”.

* Note a slight change in wording from the original 2006 Amendment Application.

Please accept this letter as an Addendum to the City’s current Type A Water License Renewal Application submitted to the Nunavut Water Board (NWB) on October 12, 2012. In addition to the items listed in Table 1 above, the City would like this addendum to include the following items:

1. Increase the scope of the license under Part A, Item 1(a) “Water Use” to include Supplementary Water Supply from Apex River. If all information is not ready when the license renewal is being considered, the City suggests that relevant submission requirements and deadlines be included in the terms and conditions of the new license (e.g. Submission of the supplementary supply plan for NWB review and approval, submission of engineering design for review and approval, submission of as-built drawings for review and approval).
2. Increase the scope of the license under Part A, Item 1(a) “Solid Waste

Management”, to include development of a new Solid Waste Management Site and Facility as per the City’s Solid Waste Management Plan, which is to be submitted at the end of November, 2013. If all information is not ready when the license renewal is being considered, the City suggests that relevant submission requirements and deadlines be included in the terms and conditions of the new license.

3. Remove chlorinated paraffins from the Site Specific Test Group in Table 1 in Schedule C. The City cannot find an accredited lab who can analyze our samples for this parameter.
4. Removal of requirement for LC50 Bioassay analysis under the Site Specific Test Group required at station IQA-05 in Table 2 in Schedule C. The City feels that the LC50 Bioassay should be removed as it is costly and not useful for influent-effluent comparison at the Wastewater Treatment Plant. If the effluent does, not meet this criteria, it is reasonable to assume that the influent sampled at IQA-05 will not either. The City is committed to complete the required LC50 Bioassays on the Wastewater Treatment Plant Effluent as per the terms of the License.

The City feels that it is especially important to include items 1 and 2 listed above in its new water license as these projects will need to proceed in the next year to meet the water supply and solid waste management needs of the community. We are concerned that, if they are left to be addressed in a future amendment request, the associated process related delays will not allow these projects to proceed as required. Furthermore, including these items in the new license will provide clarity on the regulatory submissions that will be required to proceed with the construction and operation of these important new pieces of municipal water and waste infrastructure.

Sincerely,



John Hussey

Chief Administrative Officer
City of Iqaluit

Cc: Meagan Leach, Director of Engineering and Sustainability, City of Iqaluit; Phyllis Beaulieu, Manager of Licensing, Nunavut Water Board.

