

Environmental Protection Operations Directorate
Prairie & Northern Region
5019 52nd Street, 4th Floor
P.O. Box 2310
Yellowknife, NT X1A 2P7

ECCC File: 6200 000 001/011
NWB File: 3AM-IQA1626



May 5, 2020

via email at: licensing@nwb-oen.ca

Richard Dwyer
Manager Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0

Dear Richard Dwyer:

RE: 3AM-IQA1626 – City of Iqaluit – City of Iqaluit Type A Water Licence Amendment

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above-mentioned water licence amendment Submitted by the City of Iqaluit (the proponent). You will find our Final Written Submission attached.

ECCC's provides specialist advice based on our mandate pursuant to the *Canadian Environmental Protection Act* and the pollution prevention provisions of the *Fisheries Act*.

ECCC provides the following comments:

1. Leachate treatment options evaluation memo

Reference(s)

- Section 5.2.12 Leachate Treatment System, Method Statement of Construction report (Dillon Consulting, January 2020)

Comment

As described in the Method Statement of Construction report, leachate will be collected via the landfill's liner system and then pumped to the leachate collection facility. Section 5.2.12 of this report indicates that on August 30, 2019, Dillon Consulting submitted a leachate treatment options evaluation memo to the City of Iqaluit. This memo apparently presented several options for leachate treatment at the new landfill. This memo does not appear to be included in the water licence amendment application. Submission of this memo is important to support an understanding of leachate treatment options.



ECCC Recommendation(s)

ECCC requests that the leachate treatment options evaluation memo that was submitted by Dillon Consulting to the City of Iqaluit on August 30, 2019 be provided for review.

2. Monitoring and Inspection

Reference(s)

- Section 5.0 Monitoring and Inspection, Environmental Protection Plan – Construction Phase, Version 3.0 (Dillon Consulting, January 2020)
- Section 5.0 Monitoring and Inspection, Environmental Protection Plan – Operations, Closure and Post-Closure Phases, Version 3.0 (Dillon Consulting, January 2020).

Comment

Both of the Environmental Protection Plans (i.e., EPP - Construction Phase; and EPP - Operations, Closure and Post-Closure Phases) lack sufficient information on monitoring and inspection activities. Section 5.0 (Monitoring and Inspection) of both plans is a single short paragraph which concludes "*There may be a need to revise specific monitoring and inspection activities outlined below...*". However, neither document outlines monitoring and inspection activities.

ECCC Recommendation(s)

ECCC recommends that the proponent update Section 5.0 (Monitoring and Inspection) of both Environmental Protection Plans (i.e., EPP - Construction Phase; and EPP - Operations, Closure and Post-Closure Phases) to specify the monitoring and inspection activities that will be conducted.

If you need more information, please contact Eva Walker at (867) 669-4744 or Eva.Walker@Canada.ca.

Sincerely,

[original signed by]

Eva Walker
Senior Environmental Assessment Coordinator

Attachment(s):

cc: John Olyslager, Acting Head, Environmental Assessment North (NT and NU)