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February 5, 2016

Karén Kharatyan  
Manager of Licencing  
Nunavut Water Board  
PO Box 119  
Gjoa Haven, NU  
X0B 1J0

**RE: Changes to Schedule C of expired licence 3AM-IQA0611 and the Monitoring Program**

Dear Mr. Kharatyan:

On January 13<sup>th</sup> and 14<sup>th</sup>, 2016, representatives of the City of Iqaluit (City) attended the Technical Meeting, Public Meeting and Pre-Hearing Conference for the renewal application of Water Licence 3AM-IQA0612. During the meetings, the Nunavut Water Board (NWB) requested the City to provide an updated listing of changes to the monitoring stations associated with Schedule C of expired licence 3AM-IQA0611.

The City prepared a table of the changes to monitoring station sampling points that were discussed in the above-mentioned meetings. This table was circulated by email on January 22, 2016 to Indigenous and Northern Affairs of Canada (INAC), Environment and Climate Change Canada (ECCC), Department of Fisheries and Oceans (DFO) and the Nunavut Water Board (NWB). The City received comments from INAC and ECCC and considered the comments for inclusion in Table 1 attached in Appendix A.

Based on the comments received from the interested parties, all parties are in agreement on Stations IQA-02 to IQA-09 (in Table 1), however, not all parties agree on Station IQA-01. It is in the City's opinion that Station IQA-01 be removed from the licence. NWB's mandate is to regulate the use of water and not regulate the quality of the source water. Sampling the quality of the source water is an operational requirement used to calibrate the treatment process at the Water Treatment Plant, helping to maintain the distribution of safe drinking quality water to the residents of Iqaluit. As the Government of Nunavut Department of Health regulates drinking water quality under the Nunavut Public Health Act, it is the opinion of the City that further regulatory oversight on this aspect of the City's water use is redundant. Additionally, there are at least three current water licences within Nunavut (Clyde River, Arctic Bay and Hall Beach) that do not require the Hamlets to provide results of water quality from their raw water source.

The City requests the changes presented in Table 1 attached in Appendix A, form the requirements for the monitoring program in the new licence.



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It should be noted that it is requested to remove Chlorinated Alkanes from the sampling requirements of the licence, however, the City is committed to work with ECCC to explore options for investigating Chlorinated Alkanes outside of the Water Licence.

If you have any questions, please contact Matthew Hamp (Director of Public Works and Engineering) at 867-979-5653 or m.hamp@city.iqaluit.nu.ca.

Sincerely,

Muhamud Hassan  
Chief Administrative Officer  
City of Iqaluit



## Appendix A Changes to Schedule C and the Monitoring Program

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Table 1 - Changes to Schedule C and Monitoring Program

Station	Location	Removal of Parameters from Schedule C 3AM-IQA0611	Addition to Parameters in Schedule C 3AM-IQA0611	Testing Frequency (before WWTP Commissioning)	Testing Frequency (after WWTP Commissioning)
IQA-01	Raw Water Lake Geraldine	Removal of testing requirements from the licence	Removal of testing requirements from the licence	Removal of testing requirements from the licence	Removal of testing requirements from the licence
IQA-02	Effluent Sewage Lagoon	Chlorinated Alkanes *, LC50 Bioassays	No Additions	Intermittently (During Decants)	Intermittently (During Decants)
IQA-03	Influent Sewage Lagoon	Removal of testing requirements from the licence	Removal of testing requirements from the licence	Removal of testing requirements from the licence	Removal of testing requirements from the licence
IQA-04	Effluent Wastewater Treatment Plant	Chlorinated Alkanes *, LC50 Bioassays	Procedure for pH Stabilization during testing of acute lethality of Wastewater Effluent to Rainbow Trout - EPS1/RM/50 (after WWTP Commissioning) if single concentration bioassay test fails, and un-ionized ammonia is less than or equal to 1.25 mg/L.	Quarterly	Monthly (all parameters except Acute Lethality Test), Annually (Acute Lethality Test)
IQA-05	Influent Wastewater Treatment Plant	Chlorinated Alkanes *, LC50 Bioassays	No Additions	Semi-Annually	Removal of testing requirements from licence
IQA-06	Sludge	No Removals	No Additions	Quarterly	Quarterly
IQA-07	Surface Water entering West 40 Landfill	Removal of testing requirements from the licence	Removal of testing requirements from the licence	Removal of testing requirements from the licence	Removal of testing requirements from the licence
IQA-08	Final Discharge Point West 40 Landfill	No Removals	No Additions	Intermittently (Prior to Decants)	Intermittently (Prior to Decants)
IQA-09	Contaminated Soils accepted at West 40 Landfill	Removal of testing requirements from the licence	Removal of testing requirements from the licence	Removal of testing requirements from the licence	Removal of testing requirements from the licence