



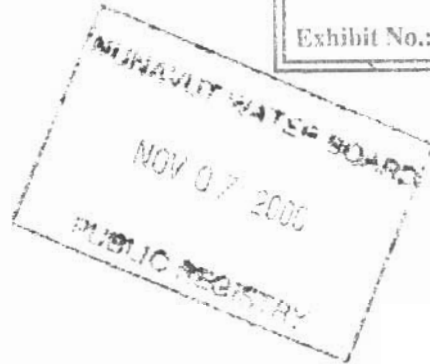
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Nunaliit Iluani Kavamat, Ingilrajuliqijillu Havakviat
Department of Community Government, and Transportation
Ministère des Collectivités et du Transport

NUNAVUT WATER BOARD	
Date:	23/11/2000
Exhibit No.:	10

November 6, 2000

By Facsimile: 867-360-6369

Phillipe Di Pizzo
Executive Director
Nunavut Water Board
Gjoa Haven, Nunavut
X0E 1J0



Dear Mr. Di Pizzo:

RE: Municipality of Iqaluit Water Licence Renewal - 2000

On behalf of the Department of Community Government and Transportation (CGT), Government of Nunavut (GN), we would like to make this intervention to the Nunavut Water Board (NWB) for your consideration in the renewal of the Municipality of Iqaluit's Water Licence.

From our understanding, the NWB will be limiting it's review of issues to the use of fresh water for municipal purposes and the disposal of wastes into fresh water. With this in mind, we offer the following comments:

Use of Fresh Water

- 1) Long Term Viability of Lake Geraldine: In their statement of evidence, the municipality indicates that they are planning to establish new long term sources of water. In May 1998, Reid Crowther & Partners Limited (RCPL) was retained to undertake a Water Treatment Plant Design Brief. The Design Brief indicates that the water quality is generally good and that as a result of height increases to the Lake Geraldine Dam, provided the level of Lake Geraldine remains high there is sufficient capacity to meet demands to the design year. Therefore, it is unclear why attention is being placed on the long-term viability of Lake Geraldine as the municipal water source.
- 2) Integrity of Lake Geraldine Dam: From general inspections, no problems have been noted with the dam, therefore, it is unclear why there is concern. Regular inspections of the dam, including sub-surface investigations, should form part of the general operations and maintenance of the facility.

Disposal of Wastes into Fresh Water

- 1) Sewage Disposal: The liquid discharge from the sewage treatment plant (and the existing lagoon) is to Koojesse Inlet, thus the Water Board may not have the jurisdiction to govern these discharges.
- 2) Existing Solid Waste Disposal Facility: The existing solid waste disposal facility has the potential of runoff entering drainage channels. Although the existing facility is likely to be abandoned in the very near future, the NWB should give consideration to requiring the municipality to submit Abandonment and Restoration plans to ensure that no deleterious substances are leached from the site.
- 3) New Solid Waste Disposal Facility: The municipality is in the process of locating and designing an incinerator and engineered landfill to address the 20 year needs of the community. Although this process is subjected to various regulatory agency review/approval, the NWB may wish to consider it as a condition of the licence that the municipality receive approval prior to construction. Given that the existing facility will be closed out in the near future and that steps are being taken to ensure its continued operation until a new facility is built, the NWB may not wish to implement restrictions beyond those currently in place.
- 4) Closure, Abandonment and Restoration of Existing Sites: There are numerous waste (sewage and solid waste) sites within the municipality that have not been properly closed. As their individual impact on fresh water is unclear, it is suggested that the NWB may wish to establish some guidelines on the abandonment and restoration of these sites, including the possible use of the existing lagoon as a back up facility for the sewage treatment plant (including repairs to the lagoon dykes). It should be recognized that runoff from these sites may not impact on fresh waters and as such, the NWB may not have the authority to govern their closure.

The GN has been working towards developing a Five Year Capital Plan which will indicate to all communities those capital projects that are planned within the Five Year planning horizon. As you can imagine, the GN is faced with significant funding decisions and as such, not all projects can be funded within the five year horizon. As a result, imposing restrictions on communities requiring expenditure of GN capital funds puts the GN in a difficult position necessitating the cancellation/deferral of other (planned) expenditures. Thus, when the NWB orders the municipality to undertake various studies, etc., we would request that the NWB also consider the funding implications and timing.

The municipality has requested a five year term for its' renewed water licence. The previous licence was for a term of one year. While we believe that a one

year term does not permit the municipality ample time to plan for various capital expenditures in the improvement of its infrastructure, there are no clear reasons why a five year term is required. As a compromise and to allow the municipality an opportunity to plan, it is suggested that the NWB consider a three year term, with clear reporting requirements.

I trust this explains our position on the matters to be discussed. Should you require any additional information, please do not hesitate to contact me at 867-975-5341.

Sincerely,

Douglas R. Sitland, P.Eng.
Manager, Capital Programs
Community Development Division
Department of Community Government and Transportation

