

Nunavut Water Licence Hearing March 7 – 9, 2006 City of Iqaluit Renewal Application

DOE Closing Statements.

DOE does not have any “show stopper” concerns with this application.

Our primary concerns relate to the paucity of information pertaining to the short and long term management of the current sewage lagoon. Overall, DOE believes that the City’s proposed sewage treatment system appears to be a sound, proven technology.

The City has made vast improvements to their solid waste management facility and practices and in particular, the management of hazardous wastes.

The City should develop A&R plans for those facilities which are under their control/management and which are intended to be closed in the near future. These include “honey bag” hill, the Apex dump, the current landfill and, should they choose to decommission it, the sewage lagoon. It is understood that the ownership of, and responsibility for, many of the other impacted sites within the City boundaries are in dispute and therefore DOE will not comment on these in this venue.

The City of Iqaluit should develop, as soon as possible, a long-term solid waste management plan. Information provided by the City over the past two days makes it clear that they are counting on being able to construct a new landfill – at an as-yet unspecified location -- for both solid waste and sewage sludge management. The City should be mindful that in the long term, land filling may not be a viable option due to potential (and probable) public opposition to locating a landfill anywhere else but where they are located at the present time. DOE wishes to stress that we are not attempting to advocate for or against a particular technology: we are merely alerting the City to a very real impediment to the establishment of a long-term landfill. DOE draws the City’s attention to Nav Canada’s proposal to construct a radar installation a few miles east of the Road to Nowhere several years ago. The project, which would have had minimal impact on the environment, both aesthetically and physically, was terminated due to fierce public opposition. Instead, Nav Canada located their installation at Upper Base. DOE foresees even fiercer public opposition to establishing a landfill in this (Road to Nowhere), or any other “pristine” area.

The City should develop a soil and water management plan should they intend to conduct excavations in areas (such as Lower Base) suspected to be, or confirmed, contaminated.

The City of Iqaluit is facing problems unlike those faced by any other City in Canada: historic contaminated sites; aging infrastructure; a population boom (2 x since 1991) and a high turnover of engineering staff. Despite these hurdles, the City has progressed in many areas. While there is much room for improvement, the City is to be commended for their continuing efforts.

DOE is willing to provide assistance to the City when and where possible.

DOE's priorities and proposed deadlines are as follows:

- Leachate and Runoff Monitoring Plan – June 2006
- Leachate and Runoff Control Implementation – Upon commissioning of the new (old) site.
- Management Plan for Contaminated Soils – June 2006
- Lagoon Plan – Within 1 year of issuance of licence
- Long-Term SWM plan – within 4 years after the issuance of the licence.
- Abandonment and Restoration Plans – within 4 years of the issuance of the licence or at a time mutually agreed upon by the NWB, the City and other interested parties.

It should be noted that the deadlines were cobbled together in haste and therefore DOE believes that these deadlines are negotiable. DOE suggests that the NWB engage the regulators and the City in discussions in order to arrive at a schedule which is acceptable to the regulators and with which the City can reasonably comply.

DOE would like to thank the NWB for providing us with an opportunity to intervene in this application. DOE would also like to acknowledge the efforts and professionalism demonstrated by the City of Iqaluit and by the interveners in providing informative and engaging presentations.



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