



DIAND Nunavut District  
Box 100  
Iqaluit, NT  
XOA OHO

March 3, 1998

Your file    Votre référence

Mr. Ian Mosher, P. Eng.  
Director, Engineering and Planning  
Municipality of Iqaluit  
Iqaluit, NT  
XOA OHO

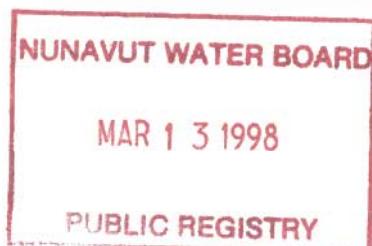
Our file    Notre référence  
B9545-5-N5L3-0087

Dear Mr. Mosher,

Request for Information - Water Licence Requirements

Ref:    - Your letter dated February 20, 1998.  
         - My letter of January 23, 1998 (attached).

1.      Thank you for providing the information requested in my letter of November 18, 1997 relating to compliance of specific terms and conditions of water licence N5L3-0087.
2.      With respect to the information you have provided, and specifically to Part D, Item 13 (long term waste management plans), the Town has not approached the situation in an acceptable manner. The Licence clearly states what the requirements were and when they had to be met. The fact that the current waste disposal site is operating in a satisfactory way and will exceed designed life expectancy of 5 years is irrelevant. Without written approval from the Nunavut Water Board that the Town has been exempted from this requirement, the Town remains in violation of this clause as this plan was due January 1, 1997.
3.      The same can be said for Part D, Item 10 (spill contingency plan). Without written approval, the Town is in violation of its licence as this plan was due June 30, 1996.
4.      In my letter of January 23, 1998 I had requested that deficiencies noted in the 1996 Compliance Report also be addressed. Your reply did not respond to any of these issues other than to request additional meetings to discuss the issues.



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5. The following is a summary of outstanding issues identified in the 1996 Compliance Report that must be addressed:

(Part D, Item 2). The Licensee met the effluent discharge requirements during open water periods for the parameters of BOD, TSS and pH. Total coliform levels for August and September are within licence limits, but for the remaining months between June and October, faecal coliform levels are reported as 'greater than 1600'. This is not an acceptable form of measure. This concern was expressed in the last compliance review, but the Town did not address it. The licence limit is 1,000,000 CFU/dL.

(Part D, Item 3). As a result of the last inspection (October 7, 1996) the Licensee was going to establish a reference mark on a concrete structure in the lagoon such that a reference position could be made so as to ensure that a minimum 1.0 m freeboard could be maintained. At this time, the freeboard is not being maintained. The Licensee is requested to provide the recommendation granted by a qualified geotechnical engineer, per Part D, Item 3, of the licence that allows for a freeboard of less than 1.0 m to be maintained. At present the Licensee is not in compliance with this section.

(Part D, Item 4). Because the Licensee was not maintaining the 1.0 metre freeboard level, the lagoon was not being operated in a manner to prevent structural failure.

(SNP, Part B, Item 2). The Licensee has not complied with this section. The Licensee has reported analysis for SNP station 0087-5 for the month of July and indicate that no run-off was present for the months of August, September and October (periods of flow). There should have been a sample collected in June and during the inspection of October 7, 1996, a sample was collected at this location by the Inspector. The Licensee is requested to address why these samples were not collected. In addition, the Licensee was advised on June 11, 1996, in writing, that there was flow at station 0087-6. No samples were collected by the Licensee.

(SNP, Part B, Item 3). PCB and PAH data should have been collected from 0087-6.

(SNP, Part B, Items 4+ 5). The Licensee uses the services of NovaMann Intl. for their analytical lab work. Formal approval of this facility was granted on January 9, 1996. However, there are two parameters (ammonia and mercury) that no formal approval was granted due to insufficient information relating to quality performance. The Licensee was requested to address these shortcomings to achieve full approval for their laboratory services. To date this information has not been provided. The result of this is that for all SNP reporting the Licensee has provided this year, the values for ammonia and mercury can not be considered valid. The Town is reporting these parameters, but has not yet provided information which will allow the Analyst to approve their methodology. In this 1996 Annual Report, no indication has been provided regarding who did the laboratory analysis. If it was a company other than Novamann, new approvals will have to be sought. Further clarification is required on the Town's part.

6. I realize that some of these issues are being addressed at this time, but since the Town has not addressed all of these matters and additionally, has failed to provide a written reply to previously identified outstanding issues, nothing less than a formal written reply is acceptable.

7. It is also important to keep in mind that the Town of Iqaluit will be required to go through a water licence renewal process in the coming months, and the above issues must be addressed prior to this.

8. I am available to meet with yourself and/or Mr. Burton to discuss these issues and how to suitably address them in your written reply.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Smith".

Paul Smith  
Water Resources Officer  
Nunavut District

cc. - Nunavut Water Board, Gjoa Haven  
- DIAND Water Resources, YK