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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

File: 3AM-IQA0611/TR/B,2

September 30, 2010

Paul Clow, Project Officer
City of Iqaluit
P.O. Box 460
Iqaluit, NU, X0A 0H0
Email: p.clow@city.iqaluit.nu.ca

Subject: Review of 2009 Annual Report

Dear Mr. Clow;

The Nunavut Water Board (NWB or Board) distributed the 2009 Annual Report to interested parties for information purposes on November 23, 2009. No comments were received. However, the NWB has reviewed the Annual Report and notes the following for the Licensee's consideration in developing the 2010 Annual Report and forthcoming renewal application:

Schedule B, Item c:

The volumes of sludge removed from the Waste Water Treatment Plant were provided and the NWB understands that the sludge is placed in the West 40 landfill. However, the NWB notes that Part E Item 7 of the Licence states that the Licensee shall submit to the Board for approval the "Final Assessment of the Sludge Management Pilot Project", completed by an Engineer, within 30 days following notification in accordance with Part E, Item 3(d). Part E, Item 3(d) refers to the commissioning phase of the Waste Water Treatment Plant. The NWB requests an update on the status of this item.

Schedule B, Item d:

The annual report indicates that the Monitoring Program was not implemented in 2009. The NWB further observes that, to date, no monitoring data has been collected for the term of the Licence. The failure to implement the Monitoring Program has also been identified by the Inspector as being a reoccurring issue of non-compliance. This is an issue that NWB expects will be addressed by the Licensee in 2010, and in a forthcoming Licence renewal application.

Schedule B, Item i:

The annual report identified that there were no addendums submitted for the Operation and Maintenance (O&M) Manual. The NWB would like to remind the Licensee that there is no O&M Manual on file as required by Part E, Item 6. This issue was also noted and brought to the

Licensee's attention in the NWB's administrative compliance assessment provided in April 2009 and in the Inspection Reports provided by Indian and Northern Affairs Canada.

Schedule B, Item k:

The annual report identified that there were no addendums submitted for the Closure and Reclamation Plan. The NWB would like to remind the Licensee that there is no conceptual Closure and Reclamation Plan on file as required by Part J, Item 1. This issue was also noted and brought to the Licensee's attention in the NWB's administrative compliance assessment provided in April 2009 and in the Inspection Reports provided by Indian and Northern Affairs Canada.

Schedule B, Item m:

The annual report only discusses two (2) of several issues identified in the Inspection Reports. Omitted issues identified in the 2009 Inspection Report include:

- Annual reports have not been submitted as required;
- Failure to implement the Monitoring program as outlined in Part I of the current license;
- Failure to submit a QA/QC Plan;
- Failure to submit Operation and maintenance manual;
- Failure to submit the Final Assessment of the Sludge Management Pilot Project;
- Failure to submit a report on the options available to the Licensee to address the issue of collection, treatment and release West 40 Landfill Waste Water;
- Failure to submit As-built drawings as required for the Waste Water Treatment Plant;
- Failure to install Filter mesh on the Intake at Lake Geraldine;
- Failure to develop and implement a "General Monitoring program with monthly submissions to the Nunavut Water Board;
- Failure to submit the required conceptual A&R Plan as required by Part J item [1] of the License;
- Sewage treatment does not meet and can not meet the criteria set out in the license;
- Licensee is required to segregate and store hazardous materials and chemicals;
- The Licensee has failed to address Part E item 15. (Storage of Hazardous Materials)

The NWB anticipates that each issue will be addressed and that follow-up on the West 40 landfill upgrades and Lake Geraldine Dam leak will be provided with the renewal application and in the 2010 annual report.

Schedule B, Item p:

The 2009 annual report acknowledges that the City received letters dated May 20, 2009 and January 7, 2010 asking for the outstanding information items outlined in the Municipal Status Report Summary (up to April 20, 2009). The annual report further states that on February 5, 2010, the City notified the NWB of its intent to submit the requested information by May 15, 2010. However, according to the NWB's file, the information has not yet been received.

The NWB finds that the annual report is substantially deficient, which is in part attributable to the Licensee's failure to meet many of the Licence requirements as identified by the Inspector and the NWB's own administrative assessment.

The NWB notes that the Licence is set to expire approximately 8 months from now, on May 15, 2011. The NWB was previously advised by the City that a renewal application would be submitted in either May or June 2010. However, as the application has not yet been received, the NWB is requesting an update and recommends that an application be provided as soon as possible. Given the issues identified with this file, the NWB advises that a Plan for Compliance will be an integral part of the renewal application.

Should you have any questions regarding Annual Reporting requirements or otherwise, please do not hesitate to contact the NWB office.

Yours truly,

Original signed by:

Phyllis Beaulieu
Manager of Licensing

TLA/pb

Cc: Meagan Leach, City of Iqaluit
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