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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

File No.: **3AM-IQA1626**

December 12, 2018

Matthew Hamp

Amy Elgersma

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RE: NWB Technical Review of 2017 Annual Report and potential need for the City Of Iqaluit to Amend their Type “A” Water Licence No. 3AM-IQA1626.

Dear Mr. Hamp and Ms. Elgersma:

The Nunavut Water Board (NWB) has completed a technical review of the 2017 Annual Report for the City of Iqaluit’s (the City or the Licensee) Type “A” Water Licence 3AM-IQA1626 (the Licence). The Report was received on November 7, 2018, as a requirement under Part B of the Licence.

The following subjects were identified as matter for discussion during the Technical Review of the Annual Report:

Water Use:

1. As noted in the Annual Report and the most recent Water Licence Inspection Form,¹ the Licensee exceeded the max allowable water usage Under Part D, Item 1, of the Licence. This remains the single greatest concern of the NWB with respect to the City meeting their Licence requirements. The NWB would like to remind the Licensee that the recent (August 14, 2018) issuance of Amendment No. 1 to the Licence was on an emergency basis, and for a term not exceeding one (1) year. Both the NWB and the Minister² have

1 CIRNAC Water Licence Inspection Form dated November 26, 2011; Inspector Jonathan Mesher, Date of Inspection June 4, 2018.

2 Letter from Minister Carolyn Bennett to Madeleine Redfern (City of Iqaluit), Sharon Ehloak (NPC), and Ryan Barry (NIRB); August 10, 2018

emphasized this point so that future water need will require a solution in the form of a permanent Amendment to the current Licence (see below).

2. The Annual Report noted that water use records were missing from January and February 2017, however no explanation was provided as to why. Future reports would benefit from the inclusion of this type of information.
3. A drinking Water Management Plan was initiated in August of 2017 to ensure the City is using the available drinking water as efficiently as possible. However, this plan was not provided to the NWB and would benefit our understanding of the City's needs.

Waste Management:

4. Between October 14-18, 2017, an emergency sewage lagoon decanting to the Koojesse Inlet took place, however no record was provided to the NWB to indicate that written authorization was given by an Inspector as per PART E, Item 15, of the Licence. The NWB notes that in 2018, a similar decanting of the sewage lagoon took place in which it has a record of the written authorization given by an Inspector. However, the repeated occurrence of sewage lagoon decanting appears to happen on an annual basis with some predictability, and as such should not logically be handled recurrently on an "emergency" basis.

General Requirements:

5. Under PART A, Item 1, the Licensee is required to submit the Annual Report by March 31, 2018. The report was received on November 7, 2018, however the NWB, under current circumstances, recognizes and appreciates the efforts made by the Licensee to submit a thorough Annual Report when it did.
6. It was noted that QA/QC testing was limited during 2017 as a result of staff shortage. It is recommended that the Licensee develop an internal contingency plan for this situation to include monitoring ability under different levels of staffing.
7. The Licensee is also required to submit to the Board, updates to the following plans and programs in accordance with the terms and conditions specified below. These Plans have not yet been submitted as required by the Licence. The NWB will appreciate these plans' submission separately or along with the potential upcoming amendment application package:
 - a. An updated potable Water Treatment Plant Manual (PART D, Item 2).
 - b. An updated Operational and Maintenance Manual for the Sewage Lagoon facility that addresses the requirements for both the sewage lagoon and sludge management facilities (PART E, Item 6).
 - c. An updated Landfill Operations and Maintenance Manual (PART E, Item 12), including a updated West 40 Landfill Drainage Management Review (PART E, Item 14).

- d. An updated Monitoring Program that address monitoring requirements for the Water Treatment Facility (PART I, Item 2).
- e. An updated Quality Assurance and Quality Control (QAQC) Plan (PART I, Item 5).

The NWB notes that the CIRNAC Inspection report of June 4, 2018 identified administrative (stated above) and operational issues. The Licensee is requested to address issues identified by the NWB and by the Inspector³ on a timely manner.

Stalled Amendment Application

The NWB would also like to draw your attention to the pending application for an amendment to the Licence submitted to the Board in 2016.

On February 27, 2016, the Nunavut Water Board (NWB) received an Application from the City of Iqaluit to Amend Type “A” Water Licence 3AM-IQA1626. On January 12, 2017, the City of Iqaluit retracted this application and informed the NWB that a new Amendment application would be submitted to incorporate a number of necessary changes⁴. Since then, this application appears to be stalled and there is little information forthcoming about it from the City of Iqaluit. The NWB is concerned about the City of Iqaluit’s current situation as it encountered a potential water shortage in 2018 that was mitigated on an emergency basis with the understanding that an emergency Licence Amendment would not be granted for a future water shortage, rather it should be treated as a full Amendment and go through the ‘normal’ transparent public process. This was emphasized by the Minister’s direction to certify “*the temporary works and activities intended to address the emergency replenishment of Lake Geraldine for the coming winter*” [underlining added]⁵.

It should also be noted that NWB was recently told by City of Iqaluit’s consultant that the City is preparing an application for an amendment to the Licence that will only include a request to include water use from an additional water source (Apex River) and increase the total water use volume. The NWB wonders on reasons for not including within the upcoming amendment application items previously discussed between Parties, the NWB and the City of Iqaluit during the Water Licence renewal process. These items include additional necessary provisions for waste disposal and sewage treatment within the City.

The NWB will appreciate an update related to the pending amendment application and is willing to work cooperatively with the City. The NWB believes that a strong communication between the City and NWB is important and mutually beneficial.

Should you have any questions, please contact myself, Derek Donald at Derek.Donald@nwb-

³ CIRNAC Water Licence Inspection Form dated November 26, 2011; Inspector Jonathan Mesher, Date of Inspection June 4, 2018.

⁴ Letter from City of Iqaluit to NWB; Licence No. 3AM-IQA1626 – NWB’s Assessment of Outstanding Licence Requirements Proposed Timeline; January 11, 2017.

⁵ Letter from Minister Carolyn Bennett to Madeleine Redfern (City of Iqaluit), Sharon Ehloak (NPC), and Ryan Barry (NIRB); August 10, 2018

oen.ca and (867) 360-6338 (extension 32) or the NWB Director of Technical Services, Karén Kharatyan, at KarenKharatyan@nwb-oen.ca and (867) 360-6338 (extension 35).

Regards,



Derek Donald
Nunavut Water Board,
Technical Advisor

Cc: Distribution List – Qikiqtani