

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

July 17, 2019

Matthew Hamp Director of Public Works and Engineering City of Iqaluit P.O. Box 460 Iqaluit, NU, XOA 0H0

E-mail: M.Hamp@city.iqaluit.nu.ca

Subject: NWB Technical Review Comments on the City of Iqaluit's 2018 Annual Report

for Water Licence No. 3AM-IQA1626

Dear Mr. Hamp,

Thank you for the 2018 Annual Report submitted to the Nunavut Water Board's (NWB or Board) on March 29, 2019, by the City of Iqaluit (the City or Applicant) for their Type "A" municipal Water Licence 3AM-IQA1626 (Licence). Following receipt of the 2018 Annual Report, the Board distributed it for external review and received comments from Crown-Indigenous Relations and Northern Affairs (CIRNA) on June 19, 2019. Copies of these comments are attached to this email, have been placed in the Board's Public Registry, and are made available through the NWB's FTP site using the following link:

ftp://ftp.nwb-oen.ca/registry/3%20MUNICIPAL/3A/3AM%20-%20Municipality/3AM-IQA1626/3%20TECH/1%20GENERAL%20(B)/2%20ANNUAL%20RPT/2018/

In addition, the Board has reviewed the 2018 Annual report and is providing the following technical comments:

# 1. Missing Monitoring Data and Improvement of Data Presentation

<u>Comment</u>: The 2018 annual report is missing data for a number of monitoring requirements as outlined in Schedule I of the Licence, including:

- Volume decanted from the sewage lagoon at IQA-02;
- Quarterly water quality measurements of Wastewater Treatment Plant Effluent at IQA-04;
- Biannual water quality of the Waste Water Treatment Plant Influent at IQA-05;



- Quarterly measurements of sludge quality/chemistry from the waste water treatment facility at IQA-06; and
- Water quality and quantity effluent discharged from the West 40 Landfill at IQA-08.

In Addition, the data is provided only in the form of original lab reports with no indication that it has been reviewed and evaluated by the Licensee.

<u>Recommendation</u>: Provide the missing data if it is available, or alternatively provide a brief explanation as to why the samples were not collected and what steps will be taken to ensure that this data is collected for 2019.

<u>Recommendation</u>: Provide a clearer presentation of collected data for all subsequent Annual Reports, including Microsoft Excel summary tables and charts.

## 2. Sylvia Grinnell River Report - Options Evaluation

<u>Comment</u>: The 2018 Annual Report mentions that a Options Evaluation / Concept Design for Raw Water Supplementation – Sylvia Grinnell Rivera was conducted in 2018/2019 and that "Completion of the concept design report is expected in Q1-2019."

<u>Recommendation</u>: Provide the NWB with a brief summary and/or copy of this Options Evaluation Report and its findings.

### 3. Timeline for commissioning of new Waste Water Treatment Plant (WWTP)

<u>Comment</u>: The 2018 Annual Report states that the Commissioning of the new WWTP will occur in March 2019, prior to its construction in 2020, which is erroneous.

<u>Recommendation</u>: Provide the NWB with the expected timeline of final commission for the new WWTP.

### 4. <u>List of Outstanding Submissions</u>

<u>Comment</u>: The Board Notes Table 1 (below) provides a list of submissions, both outstanding and previously submitted, as required by the Licence:

<u>Recommendation</u>: Provide a brief timeline for the completion and submission of outstanding documents.

#### 5. Actions Taken to Address Concerns Raised in Inspection Reports



<u>Comment</u>: A number of issues were raised in the CIRNAC Inspection Report dated June 4, 2018, requiring action by the Licensee. However, the 2018 Annual Report states that "No actions were taken to address the concerns and deficiencies listed in the previous inspection reports."

Recommendation: Provide a follow up summary, responding to the June 4, 2018 Inspection Report.

Note that the Board appreciates the City's current water supply situation, the Licence amendments currently underway, and all efforts the City is making to help facilitate a smooth and robust Licensing process. As such, the Board request that the City provide a response to comments by **September 4, 2019**.

If you have any technical questions or require clarification on the above, please contact Derek Donald, Technical Advisor, at (867) 360-6338 (Ext. 32) or by email at <a href="mailto:derek.donald@nwb-oen.ca">derek.donald@nwb-oen.ca</a>, or for any procedural or administrative inquiries, Richard Dwyer, Licensing Manager at (867) 360-6338 (Ext 27), or by email at <a href="mailto:licensing@nwb-oen.ca">licensing@nwb-oen.ca</a>.

Sincerely,

Derek Donald Technical Advisor Nunavut Water Board

cc. Distribution List – Qikiqtani



Table 1: List of Outstanding Submissions for NWB Licence 3AM-IQA1626.

| Licence<br>Condition /<br>Inspection<br>Report | Report Title                              | Timeline for Submission  | Submitted or Not  |
|--|---|--|---|
| D2   | OM Manual Water<br>Treatment Facility     | August 17, 2016 The Licensee shall submit to the Board for approval, within sixty (60) days of the Effective Date of the Licence, an updated manual for the potable Water Treatment Facility                     | Not submitted  On Jan 4, 2019, email from  Mohammed.Fawzi@colliersprojectleaders.com  to derek.donald@nwb-en.ca, indicating that it is "To be submitted by March 2019." |
| E6   | OM Manual<br>Sewage Treatment<br>Facility | October 17, 2016 The Licensee shall submit to the Board for approval in writing, within four (4) months of the Effective Date of the Licence, an Operation and Maintenance Manual for the Sewage Lagoon Facility | Not submitted  On Jan 4, 2019, email from  Mohammed.Fawzi@colliersprojectleaders.com  to derek.donald@nwb-en.ca, indicating that it is "To be completed by Oct. 2019."  |
| E12  | OM Manual<br>Landfill                     | August 17, 2016 The Licensee shall submit to the Board for approval, within sixty (60) days of the Effective Date of the Licence, an updated Landfill Operation and Maintenance Manual                           | Submitted.  Approved by NWB on March 21, 2019.  |
| H1   | Updated Spill<br>Contingency Plan         | July 17, 2016 The Licensee shall, submit to the Board for approval in writing, within thirty (30) days of the Effective Date of this Licence, an   | Received on March 5, 2019, a Spill Plan dated May 2016, only a few weeks before the   |

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| I2   | Updated<br>Monitoring            | amalgamated and updated Spill Contingency Plan  The Licensee shall, submit Board for approval in writing, within sixty (60) days of the Effective   | Licence was issued and likely to fulfill this Licence requirement. Satisfactory Plan but never approved by NWB.  Submitted. |
|--|----------------------------------|---|---|
|  | Program                          | Date of this Licence, an updated Monitoring Program   | Approved by NWB on May 6, 2019.   |
| 15   | QA/QC Plan                       | August 17, 2016 The Licensee shall, submit to the Board for review, within sixty (60) days of the Effective Date of the Licence, an updated Quality Assurance/Quality Control (QA/QC) Plan  | Submitted Approved by NWB on May 6, 2019.   |
| CIRNAC<br>Water<br>Licence<br>Inspection<br>Form dated<br>June 4, 2018 | Surface Water<br>Management Plan | A Plan that captures all usages of water as described in the Nunavut Waters and Nunavut Surface Rights Tribunal Act and the corresponding regulations that are managed and used by the licensee, and that address concerns raised by the Inspector. To be submitted to the Inspector and NWB once complete. | Not submitted   |
|  |                                  |   |   |