



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
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Your file - Votre référence
3AM-IQA1626
Our file - Notre référence
CIDM#1263936

October 3, 2019

Derek Donald
Technical Advisor
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: licensing@nwb-oen.ca

**Re: Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) Reply to
City of Iqaluit Responses to CIRNAC Review Comments on City of Iqaluit
2018 Annual Report for Water Licence No. 3AM-IQA1626**

Dear Mr. Donald,

Thank you for your September 25, 2019 invitation for Crown Indigenous Relations and Northern Affairs Canada (CIRNAC) to reply to City of Iqaluit responses to CIRNAC review comments on the City of Iqaluit (City) 2018 Annual Report for Water Licence No. 3AM-IQA1626. CIRNAC examined the submission. Replies are provided pursuant to CIRNAC's mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

If there are any questions or concerns, please contact me at (867) 975-4282 or bridget.campbell@canada.ca or Godwin Okonkwo at (867) 975-4550 or godwin.okonkwo@canada.ca.

Sincerely,

Bridget Campbell,
Water Resource Coordinator



Attachment A:

Replies to Responses to Review Comments

A. BACKGROUND

The City of Iqaluit (City) submitted the 2018 Annual Report to the Nunavut Water Board (NWB) on March 29, 2019, as required by Licence No. 3AM-IQA1626. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) reviewed the Annual Report and submitted review comments to the NWB on June 19, 2019. The City responded to CIRNAC comments on September 24, 2019. CIRNAC reviewed these responses and the results of the review, including the status of resolution for comments, are provided in Section B. A summary of the resolution status for review comments is provided in Table 1.

Table 1: Resolution Status for Review Comments

	Comment	Resolution Status
1	Monitoring Requirements	Resolved
2	Spill Report Not Submitted	Unresolved
3	Instrumentation at Station No. IQA-01	Resolved
4	Surface Water Management Plan	Resolved
5	Concerns Raised in Inspection Reports	Partially Resolved

B. STATUS OF RESOLUTION FOR RESPONSES TO REVIEW COMMENTS

1. Monitoring Requirements – Resolved

CIRNAC notes that Lab analysis sheets B18-07383-1 and B18-11879-1 were not provided for sample station IQA-06. The City of Iqaluit submitted these sheets as requested, and this issue is resolved.

The testing frequency outlined in *Schedule I: Conditions Applying to Monitoring* of Water Licence No. 3AM-IQA1626 was not met for all sample stations in the monitoring summary of the 2018 Annual Report. The City of Iqaluit noted it had capacity issues as there were staff changes and construction operations during this time. CIRNAC appreciates the capacity issue and encourages the City to meet sampling requirements for the next Annual Report.

The names and letter codes of the required test groups outlined in Water Licence No. 3AM-IQA1626 differ from the names and letter codes of the test groups reported in *Table 5: Summary of 2018 Sampling Conducted* in the Annual Report (page 10). The City of Iqaluit has provided a conversion chart which includes the test group as specified under the licence requirements (i.e. R, E, AL, N, B, ICP, PW, F, LS). The chart does not, however, provide a conversion to the lab tests included in the Annual Report (i.e. A,



B, C, D, F). CIRNAC recommends that a conversion chart include both test groups in the 2019 Annual Report submission. This suggestion is intended to aid reviewers and therefore requires no further action with the 2018 Annual Report for resolution.

2. Spill Report Not Submitted – Unresolved

CIRNAC noted that the Spill Report corresponding to February 12, 2018 at the Discharge Station (Spill I.D. No. N/A), was not submitted with the 2018 Annual Report. The City of Iqaluit responded that this Spill Report “... might have been incorrectly listed.”

Recommendation:

CIRNAC recommends that the City of Iqaluit confirm whether the spill was incorrectly listed.

3. Instrumentation at Station No. IQA-01 – Resolved

CIRNAC recommended that the City of Iqaluit continue to monitor the quantity of water extracted from Lake Geraldine by instrument, and maintain the instrument at Station No. IQA-01 in working condition. The City has agreed to continuously measure the quality of water from Lake Geraldine and to provide proper maintenance to the instrumentation present at Station IQA-01.

4. Surface Water Management Plan – Resolved

The June 2018 Inspection report by CIRNAC Water Resource Officer indicates that the Inspector recommended the City submit the Surface Water Management Plan, which was in development, to the Nunavut Water Board for review. No management plans were submitted by the City as part of the 2018 Annual Report. The City of Iqaluit responded that a Surface Water Management Plan is not required by Water Licence No. 3AM-IQA1626. CIRNAC is satisfied that surface water management is outlined in the licence under Items 9 and 10 in Part D: CONDITIONS APPLYING TO THE USE OF WATERS AND WATER MANAGEMENT PLANS.

CIRNAC recommends that the Nunavut Water Board follow up with the City of Iqaluit regarding its requirements for surface water management.

5. Concerns Raised in Inspection Reports – Partially Resolved

The City of Iqaluit stated on page 13 of the 2018 Annual Report that, “No actions were taken to address the concerns and deficiencies listed in the previous inspection reports.” Most of the concerns and deficiencies listed in the referenced inspection reports have been resolved by the City in their Response to CIRNAC Comments, and some remain outstanding. Concerns which are pending follow-up by the Nunavut Water Board are considered resolved by CIRNAC.



Concerns listed in the June 4, 2018 Inspection Report (page 5) and their resolution status are as follows:

a) **Resolved**

The inspector is requesting that the City of Iqaluit amend their current water licence to appropriately capture the City of Iqaluit's current water demand, this will help prevent the ongoing failure to comply with the agreed upon water usage limit.

b) **Resolved**

The inspector is requesting that the licensee amend their current water to capture 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.

c) **Unresolved**

The inspector is requesting that the Licensee provide a report outlining what work recommended in the 2015 DSI has been completed.

d) **Resolved**

The inspector is requesting that the licensee provide reasoning for this discrepancy in the water usage to waste disposal calculation and reevaluate the way the licensee records the deposit of waste water to better reflect the actual amount of waste entering the WWTP.

e) **Unresolved**

Please provide the approval that was given for the removal of the containment ponds/waste management structures at the west 40 Landfill.

f) **Resolved – Pending Follow Up by NWB**

The licensee is to submit the required documents as described in Part G, Item 1 of the licence 3AMIQA1626 for the modifications of the west 40 landfill and complete the required work to ensure that all leachate and waste is contained in the landfill as required in Part E, Item 13.

g) **Unresolved**

The licensee is to amend the current water licence to include the deposit of waste at the end of Federal Road and implement the appropriate measures to ensure that this waste does not affect the surrounding water ways, or provide evidence that this waste is not the licensee's responsibility.

CIRNAC has not received a report outlining what work recommended in the 2015 DSI has been completed, therefore CIRNAC considers item c) unresolved.

CIRNAC Fields Operations noticed that an on-site drainage pond identified in *Appendix E - 2006 Drainage Improvements* within the West 40 Operation and Maintenance



Manual was not visible. A site plan from the Operation and Maintenance Manual is attached for reference as Figure 1 in Section C. The City has replied that no changes were made to this pond. CIRNAC considers item e) unresolved and seeks further information to explain this discrepancy.

The licensee has claimed that the legacy deposit of waste at the end of Federal Road is not the City's responsibility, but no evidence has been provided to support this claim. CIRNAC considers item g) unresolved.

Recommendation:

CIRNAC recommends the City:

- provide a report outlining what work recommended in the 2015 DSI has been completed;
- provide justification for the discrepancy between the site map in the Operation and Maintenance Manual for the West 40 Landfill and the observations made by the CIRNAC Field Operations Inspector during the June 4, 2018 Inspection;
- continue to seek resolution with CIRNAC Field Operations Inspectors outside of the 2018 Annual Report Review to confirm the agency with responsibility for the deposit of waste at the end of Federal Road; and
- follow up with the Nunavut Water Board regarding the submission of required documents.

C. PHOTOS



Figure 1: Site Map from City of Iqaluit Operation and Maintenance Manual for the West 40 Landfill with an added arrow in yellow indicating the pond that was not visible during the June 4, 2018 inspection