

Environmental Protection Operations Directorate
Prairie & Northern Region
5019 52nd Street, 4th Floor
P.O. Box 2310
Yellowknife, NT X1A 2P7

ECCC File: 6200 000 001/011
NWB File: 3AM-IQA1626



July 13, 2020

via email at: licensing@nwb-oen.ca

Richard Dwyer
Manager Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0

Dear Richard Dwyer:

RE: 3AM-IQA1626 – City of Iqaluit – 2019 Annual Report

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above-mentioned annual report for the City of Iqaluit (the proponent).

ECCC's provides specialist advice based on our mandate pursuant to the *Canadian Environmental Protection Act* and the pollution prevention provisions of the *Fisheries Act*.

ECCC is providing the following comments:

1. Sewage Lagoon Sludge

Reference(s)

- 2019 Annual Water Licence Report (May 1, 2020); Section B – The monthly and annual quantities in cubic metres of any discharges from the Wastewater Treatment Facilities (Monitoring Stations No. IQA-02, IQA-04, IQA-08)

Comment

Section B indicates that between September and October 2019, a total of 4700 cubic metres of sludge was removed from the sewage lagoon and placed within geotube containment cells.

ECCC Recommendation(s)

ECCC recommends that the geotube-treated sludge be characterized following treatment and managed/disposed appropriately, and that characterization results and disposal details be provided in the next annual report.



2. Monitoring Results

Reference(s)

- 2019 Annual Water Licence Report (May 1, 2020); Section F - A summary report which includes all data and information generated under the Monitoring Program, including the QA/QC program, in electronic and printed formats acceptable to the Board.

Comment

Section F, Table 3 (Summary of 2019 Sampling Conducted) outlines details of the monitoring conducted (*i.e.*, sampling dates and locations), but does not include the monitoring results. Monitoring results are provided in Appendix A (Monitoring Reports) as a collection of laboratory reports only. The annual report does not provide summarized monitoring results, nor field data. To facilitate data comparison and interpretation, all raw monitoring data and a tabular summary of monitoring results (laboratory and field) should be included in future annual reports. ECCC provided a similar recommendation regarding the 2018 annual report.

ECCC Recommendation(s)

ECCC recommends that future annual reports:

- Provide a tabular summary of all monitoring results, including field and laboratory monitoring;
- Clearly identify and discuss any exceedances; and
- Provide raw data (field testing and laboratory reports) for all monitoring conducted.

3. Sewage Lagoon Sludge – Operation & Maintenance Manual

Reference(s)

- City of Iqaluit Sewage Lagoon Operation and Maintenance Manual (March 31, 2020).

Comment

Section 3.13.3 (Sludge Disposal) provides some preliminary information regarding sludge disposal and indicates that the City of Iqaluit is developing a solids management plan that will determine the ultimate disposal option for sewage lagoon sludge. The Operation and Maintenance (O&M) manual does not indicate whether the proponent would characterize the sludge in this plan.

ECCC Recommendation(s)

ECCC recommends that future versions of the sewage lagoon O&M manual discuss sludge characterization and appropriate use/disposal options and thresholds, following development of the solids management plan.

If you need more information, please contact Eva Walker at (867) 669-4744 or Eva.Walker@Canada.ca.

Sincerely,

[original signed by]

Eva Walker
Senior Environmental Assessment Coordinator

Attachment(s):

cc: John Olyslager, Acting Head, Environmental Assessment North (NT and NU)