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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

File: 3AM-IQA1626

November 20, 2025

Steve England
Chief Administrative Officer
City of Iqaluit
Box 460, Iqaluit, NU X0A 0H0

Email: cao@city.iqaluit.nu.ca

RE: NWB Technical Review of 2024 Annual Report for the City of Iqaluit; Water Licence No: 3AM-IQA1626

Dear Steve England:

The Nunavut Water Board (NWB or Board) has completed the technical review of the 2024 Annual Report (Report) for type A Water Licence No: 3AM-IQA1626 (Licence) issued to the City of Iqaluit (City or Licensee). The 2024 Annual Report was received on May 02, 2025, and was submitted as a requirement under Part B of the Licence.

On May 05, 2025, the NWB acknowledged receipt of the Report and distributed it to the Iqaluit distribution list for a three-month public review. Comments were received from Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)¹ and Environment and Climate Change Canada (ECCC)² on July 28, 2025 and July 25, 2025 respectively. The comments were forwarded to the Licensee and responses to CIRNAC's comments were received on October 03, 2025. The NWB did not receive any response to ECCC's comments. The responses received were sent to CIRNAC and on November 03, 2025, CIRNAC provided the final response to their comments.

Table 1 summarizes the unresolved comments and resolved comments with pending commitments from the Licensee along with deadlines to provide responses. Please refer to the submissions addressed above for a detailed discussion of the comments.

¹ Crown-Indigenous Relations and Northern Affairs Canada's review of the City of Iqaluit 2024 Annual Report for Type A Water Licence No. 3AM-IQA1626 in the Qikiqtani Region of Nunavut, CIRNAC, July 28, 2025

² 3AM-IQA1626 – City of Iqaluit – Type A Water Licence – 2024 Annual Report Reviewed, ECCC, July 25, 2025

Table 1 Interveners Recommendations and Deadline to Respond

SN	Recommendations/Concerns	Deadline to Respond
Crown-Indigenous Relations and Northern Affairs Canada		
Unresolved Comments from the 2022 Annual Report Review		
R-03e	CIRNAC requested that the City review and update operating procedures for pH control in the treated water entering the treated water reservoir to meet Canadian Drinking Water Quality Guidelines (CDWQG).	March 31, 2026 (2025 Annual Report)
R-05	CIRNAC recommended that the O&M Manuals for the Landfill and Waste Transfer Station, Wastewater Treatment Plant and Water Treatment Plant be submitted.	With the renewal application or 2025 Annual Report, whichever is first
Unresolved Comments from the 2023 Annual Report Review		
R-02a	CIRNAC requested that the City provide a schedule for the procurement of necessary equipment to support sampling activities in 2026.	March 31, 2026 (2025 Annual Report)
R-06	CIRNAC requested that the City provide an update on future Wastewater Treatment Plant studies planned as per Schedule B Item O.	March 31, 2026 (2025 Annual Report)
R-07a	CIRNAC requested that the City provide the estimates or ranges for spill volumes when precise measurements are not available. If estimating is not possible, explain why.	March 31, 2026 (2025 Annual Report)
R-11a	CIRNAC requested that the City advise if consideration has been given for exhaustion of Granular Activated Carbon (GAC) media and its ability to continue to remove hydrocarbons.	March 31, 2026 (2025 Annual Report)
R-11b	CIRNAC requested that the City compile the lab results in an Appendix table with comparison to the applicable guidelines.	March 31, 2026 (2025 Annual Report)
R-12	CIRNAC requested that the City provide information on how GAC capacity is being tracked and steps	March 31, 2026 (2025 Annual Report)

	that are in place in the event that the GAC media has reached capacity and requires replacement.	
Unresolved Comments from the 2024 Annual Report Review		
R-02	CIRNAC requested that the City record and report the annual treated sewage volumes discharged from the Sewage Lagoon (IQA-02) between July 30, 2024, and August 9, 2024, in the 2024 Annual Report.	March 31, 2026 (2025 Annual Report)
R-03a	<p>On October 03, 2025, CIRNAC recommended the City complete the following four “very high priority” deficiencies within the year:</p> <ul style="list-style-type: none"> • Data collection from installed instrumentation (piezometers, thermistors) • Repair and cut all protrusions remaining from the grout injection repairs • Repair or relocation of the intake valve • Installation of CCTV instrumentation at the spillway <p>On November 03, 2025, CIRNAC recommended that the City collect data from the piezometers and provide a schedule to install CCTV instrumentation at the spillway.</p>	March 31, 2026 (2025 Annual Report)
R-03b	CIRNAC recommended the City provide a detailed plan that describes how the identified deficiencies will be addressed within the timelines provided in the Dam Safety Review (DSR) and Dam Safety Inspection (DSI).	March 31, 2026 (2025 Annual Report)
R-03c	CIRNAC recommended that the City detail all the proposed and ongoing actions to address the deficiencies in future reports.	Future Annual Reports (March 31 st of the following year)
R-04a	CIRNAC recommended that the City conduct a DSR or DSI for the Wastewater Treatment Facilities and provide results in the future	Future Annual Reports (March 31 st of the following year)

	annual reports.	
R-04b	CIRNAC recommended that if a DSR has not been completed in the last ten years, that one be completed in 2025.	The City indicated that a DSR will be completed in 2026. The City is requested to provide the results from DSR in the 2026 Annual Report (by March 31, 2027).
R-04c	CIRNAC recommended that a DSI be completed annually and submitted with future Annual Reports.	Future Annual Reports (March 31 st of the following year)
R-06a	<p>CIRNAC noted that some of the monitoring stations had missing samples and recommended that the City conduct monitoring and sampling in accordance with Schedule I of the Licence.</p> <p>On November 03, 2025, CIRNAC requested that the City provide an update on sampling activities conducted in 2025 and confirm whether the City is striving to be in compliance with Schedule I of the Water Licence for the remainder of the year.</p>	Future Annual Reports (March 31 st of the following year)
R-06b	CIRNAC noted that some of the monitoring stations had missing sample parameters/analytes and recommended that the City follow the monitoring and sampling requirements.	Future Annual Reports (March 31 st of the following year)
R-06e	CIRNAC requested that the City confirm the station IDs pertaining to the Waste Transfer Station (WTS) and North 40 Landfill where no sampling was conducted and provide an update on when sampling of these monitoring stations will be conducted in the 2024 Annual Report.	March 31, 2027 (2026 Annual Report)
R-06f	CIRNAC recommended that the City provide a summary report of data and information generated under the Monitoring Program in 2024 including: tabulated analytical results and comparison to applicable	March 31, 2026 (2025 Annual Report)

	criteria; utilization of station IDs in the Licence when submitting samples to the laboratory for analysis; if samples were not collected meeting the frequency requirements, provide an explanation as to why it was not done and provide QA/QC data or provide an explanation as to why it was not done.	
R-07a	CIRNAC requested that the City provide a summary report for the North 40 landfill and waste transfer facility in the 2024 Annual Report of 2025 Annual Report depending on the date that the facilities were complete.	March 31, 2026 (2025 Annual Report)
R-07b	<p>CIRNAC requested that City provide clarification on whether a notification was provided to the Board in advance of construction activities carried out in 2023 and whether as-built plans and drawings were provided to the Board within 90 days of completion of those activities.</p> <p>On November 03, 2025, CIRNAC requested an explanation as to why notification was not provided and to provide an update as to when as-built drawings (including which ones) will be provided.</p>	March 31, 2026 (2025 Annual Report)
R-09b	CIRNAC requested that the City confirm that upgrades completed at the WTP and WWTP were direct replacements (no change in make/model) that would not result in modifications required for the O&M manuals to reflect upgrades.	With the updated O&M Manuals
R-10b	CIRNAC requested clarification on whether it was considered a small, medium, or large spill based on spill types in the General Spill Response Plan and recommended adding this information to NWT/NU Spill	With the renewal application or 2025 Annual Report, whichever is first

	<p>Report Form to aid personnel to quantify spill when completing a spill report by estimating the size of the spill.</p> <p>On November 03, 2025, CIRNAC requested that a copy of this spill report be provided and included in the Spill Contingency Plan.</p>	
R-10c	CIRNAC requested that the Licensee provide more details on the follow-up actions, especially if they differ between incidents and details on how spills were collected, disposed of and specify if additional monitoring or corrective actions were taken.	Future Annual Reports (March 31 st of the following year)
R-10d	CIRNAC requested that the City provide information on spills in addition to the reported wastewater spills.	March 31, 2026 (2025 Annual Report)
R-11	CIRNAC requested the City to provide an update on when the Closure and Reclamation Plan for the for the West 40 Landfill will be submitted to the Nunavut Water Board.	One (1) year prior to commencing the decommissioning of the West 40 Landfill
R-12	CIRNAC requested that the City submit the holistic review report with the 2024 Annual Report, along with a plan and timeline to address the remedial actions identified in the report.	March 31, 2026 (2025 Annual Report)
R-13a	CIRNAC requested that the City submit an updated and recalibrated Lake Geraldine Water Balance Model to address the new bathymetric survey data collected in 2024 and the updated metrological information.	With the renewal application or 2025 Annual Report, whichever is first
R-14a	CIRNAC requested that the City confirm which hazardous wastes have not been shipped for final disposal and how they will continue to be managed on-site.	Provide an update with 2025 Annual Report (March 31, 2026)
R-14c	CIRNAC requested that the City	March 31, 2026 (2025 Annual Report)

	append records of confirmation of proper disposal of hazardous wastes shipped for final disposal to the 2024 Annual Report.	
R-16a	CIRNAC requested that the City compile the lab results in an appendix table with comparison to the applicable guidelines or instruct the lab to include the guidelines in the lab report for easy reference and comparison.	Future annual reports (March 31 st of the following year)
R-16d	CIRNAC requested that the City provide S::CAN data results (either tabular or as a screenshot graph) for review.	Future annual reports (March 31 st of the following year)
R-18a	CIRNAC requested that the City provide a summary of actions taken in the short-term to address the concerns raised in the 2024 inspection reports.	March 31, 2026 (2025 Annual Report)
Environment and Climate Change Canada (ECCC)		
1	ECCC recommended the City to provide a summary of actions to be taken to achieve acceptable wastewater treatment plant effluent quality, including a timeline for completing.	March 31, 2026 (2025 Annual Report)
2	ECCC recommended the City to discuss possible causes for the variability of sewage lagoon effluent quality between and within years; and provide a summary of actions to be taken to achieve acceptable sewage lagoon effluent quality, including a timeline for completing.	March 31, 2026 (2025 Annual Report)
4	<p>ECCC recommended that in future annual reports the City:</p> <ul style="list-style-type: none"> • summarize water quality sample results in tables presenting measured parameter concentrations for monitoring stations; • note any elevated monitoring parameters, discuss the potential underlying cause(s), and describe any measures 	Future Annual Reports (March 31 st of the following year)

	<p>taken/planned to prevent elevated parameter concentrations; and</p> <ul style="list-style-type: none"> • implement QA/QC for water quality monitoring including QA/QC samples and a discussion of the results. 	
5	ECCC recommended the City clarify the sampling location for sample ID 24-016164-2- Metal Ditch at the landfill.	March 31, 2026 (2025 Annual Report)
Nunavut Water Board		
1	<p>The 2023 Annual Report mentioned construction activities for the Federal Road Watermain Extension project and the 2024 Annual Report mentions that the construction of the Waste Transfer Station (WTS) and related infrastructure at the North 40 Landfill was substantially completed in December 2024. However, the Board has no record of receiving the IFC drawings or construction summary as required by Part F of the Licence.</p> <p>The City is reminded that the Licensee should submit IFC drawings 60 days prior to construction, and construction summary report and as built drawings within 90 days of construction.</p> <p>The Licensee is requested to submit construction summary reports and as built drawings for any work completed on water or waste infrastructure in 2023 and 2024.</p>	March 31, 2026 (2025 Annual Report)

The NWB acknowledges the following documents submitted with the 2024 Annual Report:

- Water Treatment Plant UV Reactor O&M Plans;
- Waste Transfer Station and New North Landfill O&M Plans;
- Wastewater Treatment Plant O&M Plans;
- Lake Geraldine Water Balance Model Calibration Update - 2024 Refinement and Validation – Draft

- Spill Contingency Plan
- West 40 Landfill Closure and Reclamation Plan

The NWB reminds that the expected renewal application shall include the most recent and updated versions of management plans and O&M Manuals. All documents submitted for review should include a version control section, clearly stating the changes in these documents.

Additionally, the NWB strongly agrees with the Interveners' recommendations and requests the Licensee to submit complete information associated with the Monitoring Program and properly structure the results of monitoring, specifically the lab results in a manner that facilitates easier review as required under the Part B of the Licence.

Copies of all documents received during the 2024 Annual Report review can be accessed through the NWB's Public Registry using the following link:

<https://public.nwb-oen.ca/registry/3%20MUNICIPAL/3A/3AM%20-%20Municipality/3AM-IQA1626/3%20TECH/B%20GENERAL/2%20ANNUAL%20RPT/2024/>

If you have any questions, please contact the undersigned at nidhi.singh@nwb-oen.ca or (867) 360 6338 (ext. 32).

Best regards,



Nidhi Singh
Technical Advisor
Nunavut Water Board

Enclosure: Comments - CIRNAC, ECCC
Cc: Distribution List – Iqaluit