

SN	Comments	City Response
<b>Crown-Indigenous Relations and Northern Affairs Canada</b>		
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).	The City is currently working with its Owner's Engineer to identify and evaluate options for improving pH levels to achieve compliance with the Canadian Drinking Water Quality Guidelines (CDWQG). This work includes a review of current operating procedures for pH control , as well as an assessment of whether any existing equipment requires modification, replacement, or further testing to support improved performance. Further updates on the outcome of this work and any planned operational or equipment changes will be provided in subsequent reporting periods.
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.	Updated O&M manuals will be provided as part of the City's response to the comments received on the renewal application.
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.	The City has procured the necessary equipment required to support sampling activities starting in April 2026.

R-06	<p>CIRNAC requested that the City provide an update on future Wastewater Treatment Plant studies planned as per Schedule B Item O.</p> <p style="text-align: center;"><b>WATER LICENCE</b></p> <p>A summary of any studies, reports and plans requested by the Board that relate to Waste disposal, Water use or reclamation and a brief description of any future studies planned</p>	<p>Please refer to Section O of the 2025 Annual Report for City ongoing efforts</p>
R-07a	<p>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.</p>	<p>The City will provide estimates or ranges for spill volumes going forward. If estimates are not provided an explanation of why this information is not included will be provided. Please refer to Section K of the 2025 Annual Report</p>
R-11a	<p>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.</p>	<p>As part of the City's ongoing efforts, the City is currently working with its Owner's Engineer to review the performance of the Granular Activated Carbon (GAC) system, including consideration of media exhaustion and its continued ability to remove hydrocarbons effectively. If possible, the City would appreciate further clarification from CIRNAC regarding the specific information being requested under this item, so that a more targeted and complete response can be provided.</p>
R-11b	<p>CIRNAC requested that the City compile the lab results in an Appendix table with comparison to the applicable guidelines.</p>	<p>City would provide this table moving forward. Please refer to Section F of the 2025 Annual Report</p>

R-12	CIRNAC requested that the City provide information on how GAC capacity is being tracked and steps that are in place in the event that the GAC media has reached capacity and requires replacement.	The City tracks GAC performance primarily through post-filter turbidity monitoring. Operational setpoints have been established such that if turbidity exceeds the defined threshold, a backwash cycle is automatically initiated. In addition, if the turbidity threshold is not reached within a specified period, the filter will still initiate a backwash based on time to ensure the media remains properly conditioned and effective. The City assesses potential GAC media exhaustion by monitoring overall filter performance trends. Indicators that the media may be approaching the end of its effective service life would include reduced post-filter turbidity removal following backwashing or an increase in the frequency of required backwash cycles, suggesting that the media is no longer being effectively cleaned or is losing treatment capacity.
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.	The City experienced issues with the flow meter during this discharge event, and a replacement unit has since been procured.
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"> <li>• Data collection from installed instrumentation (piezometers, thermistors)</li> <li>• Repair and cut all protrusions remaining from the grout injection repairs <ul style="list-style-type: none"> <li>• Repair or relocation of the intake valve</li> <li>• Installation of CCTV instrumentation at the spillway.</li> </ul> </li> </ul> <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>	Please refer to 2025 Annual Report Appendix > F-2022-2024 Annual Report Comments > Appendix Comments > A-DAM Deficiency List

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).	Please refer to 2025 Annual Report Appendix > F-2022-2024 Annual Report Comments > Appendix Comments > A-DAM Deficiency List
R-03c	CIRNAC recommended that the City detail all the proposed and ongoing actions to address the deficiencies in future reports.	Please refer to Section C of the 2025 Annual Report
R-04a	CIRNAC recommended that the City conduct a DSR or DSI for the Wastewater Treatment Facilities and provide results in the future annual reports.	DSI would be conducted in 2026
R-04b	CIRNAC recommended that if a DSR has not been completed in the last ten years, that one be completed in 2025.	Please refer to 2025 Annual Report Appendix > F-2022-2024 Annual Report Comments > Appendix Comments > B-Sewage Lagoon Dam Safety Requirement
R-04c	CIRNAC recommended that a DSI be completed annually and submitted with future Annual Reports.	DSI would be conducted annually starting 2026
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>	Please refer to Section F of the 2025 Annual Report for City ongoing efforts
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.	Please refer to Section F of the 2025 Annual Report for City ongoing efforts

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.	Monitoring of the Waste Transfer Station (WTS) and North 40 Landfill will begin 1 year before operation starts.
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 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.	Please refer to Section F of the 2025 Annual Report for City ongoing efforts
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.	Please refer to 2025 Annual Report Appendix > F-2022-2024 Annual Report Comments > Appendix Comments > C-Construction Summary Report
R-07b	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. 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.	Please refer to Appendix > G-2022-2024 Annual Report Comments > Appendix Comments > C-Construction Summary Report The City acknowledges that current City staff and the City's project management firm were not fully familiar with the notification requirements at the time. To address this, City staff have now been made fully aware of these requirements, and the City's project management firms will also be formally advised to prevent this issue from recurring. IFC and as-built drawings will be provided moving forward.

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.	Updated O&M manuals will be provided as part of the City's response to the comments received on the renewal application.
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 Report Form to aid personnel to quantify spill when completing a spill report by estimating the size of the spill.  On November 03, 2025, CIRNAC requested that a copy of this spill report be provided and included in the Spill Contingency Plan.	An update Spill Contingency Plan will be provided as part of the City's response to the comments received on the renewal application.
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.	Please refer to Section K of the 2025 Annual Report for City ongoing efforts
R-10d	CIRNAC requested that the City provide information on spills in addition to the reported wastewater spills.	Please refer to 2025 Annual Report Appendix > F-2022-2024 Annual Report Comments > Appendix Comments > D-Spill 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.	Closure and reclamation plan would be provided 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.	A holistic review was not completed. At present, City staff are focusing on areas to improve the wastewater treatment plant (WWTP). Please refer to Section O of the 2025 Annual Report for City ongoing efforts

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.	Please refer to 2025 Annual Report Appendix >F - Water Balance Model
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.	City confirms all hazardous wastes have been shipped for final disposal . Please refer to Section T -Table 6 of the 2025 Annual Report
R-14c	CIRNAC requested that the City append records of confirmation of proper disposal of hazardous wastes shipped for final disposal to the 2024 Annual Report.	The City is currently awaiting documentation from the contractor confirming the proper disposal of waste removed from the site. This documentation will be provided once it becomes available. The City will also ensure that this information is incorporated into future annual reports.
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.	Please refer to Section F of the 2025 Annual Report for City ongoing efforts
R-16d	CIRNAC requested that the City provide S::CAN data results (either tabular or as a screenshot graph) for review.	Please refer to 2025 Annual Report Appendix > F-2022-2024 Annual Report Comments > Appendix Comments > E-S-CAN Data
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.	The City acknowledges that the outstanding item remaining is the installation of a large section of fencing surrounding the landfill. As part of the City's ongoing corrective efforts, the procurement process has been reinitiated to ensure that the required fence extension is installed in 2026. In the interim, miscellaneous materials like sea cans are being used to provide temporary fencing and to help secure the area until the permanent fence is constructed.

**Environment and Climate Change Canada (ECCC)**

1	<p>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.</p>	<p>As part of the City’s ongoing efforts to enhance wastewater treatment performance, the City is working with its Owner’s Engineer to review and optimize operations at the wastewater treatment plant (WWTP) to ensure that equipment is operating effectively and as intended.</p> <p>This review includes consideration of opportunities to introduce redundancy within existing systems, improve operational reliability, and increase loading or retention capacity where feasible. Progress on the work completed to support operational optimization at the WWTP will be reported in future annual reports.</p>
2	<p>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.</p>	<p>As part of the City’s ongoing efforts to improve sewage lagoon effluent quality, the City is currently developing an operational plan aimed at improving effluent performance at the sewage lagoon. Funding to support this work has been included in the current year’s Capital Budget. Progress on the work undertaken and any resulting improvements will be reported in future annual reports.</p>
4	<p>ECCC recommended that in future annual reports the City:</p> <ul style="list-style-type: none"> <li>• summarize water quality sample results in tables presenting measured parameter concentrations for monitoring stations;</li> <li>• note any elevated monitoring parameters, discuss the potential underlying cause(s), and describe any measures taken/planned to prevent elevated parameter concentrations; and</li> <li>• implement QA/QC for water quality monitoring including QA/QC samples and a discussion of the results.</li> </ul>	<p>Please refer to Section F of the 2025 Annual Report for City ongoing efforts.</p> <p>As part of the City’s ongoing efforts to improve effluent quality, any issues observed during sample collection and monitoring activities that may affect effluent quality will be documented. In addition, operational issues occurring outside scheduled sampling periods will also be recorded to support ongoing assessment and discussion with the City’s Owner’s Engineer. This information will assist in identifying trends, evaluating potential causes of effluent quality variability, and supporting the development of corrective actions and operational improvements.</p> <p>Current City staff have also been familiarized with the City’s QA/QC monitoring program, which will be implemented moving forward.</p>
5	<p>ECCC recommended the City clarify the sampling location for sample ID 24-016164-2- Metal Ditch at the landfill.</p>	<p>The City acknowledges that incorrect sampling points were used for this testing as a result of staff turnover. Moving forward, the correct sampling points have been reviewed and confirmed with current city staff to ensure that future sampling is completed at the appropriate locations.</p>

**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>	<p>Please refer to 2025 Annual Report Appendix &gt; F-2022-2024 Annual Report Comments &gt; Appendix Comments &gt; C-Construction Summary Report</p>
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