



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence
3AM-IQA1626
Our file - Notre référence
CIDM#1240719

February 21, 2019

Manager of Licensing
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's Comments on the
Landfill Operation and Maintenance Manual for the City of Iqaluit, Water
Licence 3AM-IQA1626**

Dear Mr. Dwyer,

Thank you for your January 21, 2019 invitation to provide comments on the City of Iqaluit Landfill Operation and Maintenance (O&M) Manual. The update to the Landfill O&M Manual fulfilled an obligation in the amended Water Licence 3AM-IQA1626 under Part E, Item 12 (Conditions applying to the Deposit of Waste and Waste Management Plans). Details of the following components were required and provided: management of leachate from the facility; updated sampling and monitoring requirements; open burning practices; and ongoing activities within the facility. Further details are provided in Appendices K, L and M.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the submission and comments have been 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*.

1. Timing of Submission

References:

- City of Iqaluit Landfill Operation and Maintenance Manual, City of Iqaluit, December 2018.



The Water Licence required the Landfill O&M Manual to be submitted within 60 days of licence issuance, which was June 17, 2016. The city of Iqaluit provided its updated Landfill O&M Manual in January 2019, more than two years after the required date stated on the Water Licence. This submission included items that are no longer relevant, for example the Incinerator Operations and Maintenance Manual, after use of the incinerator was discontinued.

Recommendation:

CIRNAC encourages more timely submissions to ensure that concerns raised in the licence application processes are appropriately addressed.

2. Spill Contingency Plan

References:

- City of Iqaluit Landfill Operation and Maintenance Manual, City of Iqaluit, December 2018, Appendix J.

The 2007 version of the Spill Contingency Plan was provided in Appendix J. The latest version dates from 2016.

Recommendation:

CIRNAC requests the 2016 version of the Spill Contingency Plan be provided in place of the 2007 version.

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 email godwin.okonkwo@canada.ca.

Sincerely,

Bridget Campbell,
Water Resource Coordinator

CC: Matthew Hamp, City of Iqaluit