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

ECCC File: 6200 000 016/004

NWB File: 3AM-PAN----

August 31, 2017

Via email to: licensing@nwb-oen.ca

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

Dear Richard Dwyer:

RE: 3AM-PAN---- - Government of Nunavut, Community and Government Services - Type A Renewal Amendment Application for the Hamlet of Pangnirtung's Municipal Water Licence – Follow-up to Proponent's Responses to Environment and Climate Change Canada's Technical Comments

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above-mentioned water licence renewal amendment application and is submitting comments via email as requested by the NWB. ECCC's specialist advice is provided based on our mandate, in the context of the Canadian Environmental Protection Act, the pollution prevention provisions of the Fisheries Act, the Migratory Birds Convention Act, and the Species at Risk Act.

The following comments are provided following a review of the Proponent's responses to ECCC's technical comments:

1. Reported Data for Effluent Quality

ECCC provided the following comments to the Proponent:

Data Quality Assurance/Quality Control (QA/QC) issues were evident in the numerous negative values for ammonia and Total Suspended Solids (TSS) in the Wastewater Treatment Plant (WWTP) Lab Test Results spreadsheet. After April 2015 there were numerous negative TSS results reported. After October 2015 negative values for ammonia were reported and comprised most of the results between December 2015 and June 2016 (16 of 21 results). Please advise how



- data QA/QC was done and whether or not these data should have been screened out.
- Many ammonia results in the Excel spreadsheet are reported as zeros in mid-2016. What was the detection limit for these results?

The Proponent responded that "the negative numbers should have been screened out." If negative numbers are screened out, this will result in very little data. ECCC recommends that the Proponent provide the actual values that were detected.

2. Open Burning

ECCC recommended that the Proponent limit the practice of open burning to only the wastes identified in the Nunavut Guideline for the Burning and Incineration of Solid Waste. All other wastes should be disposed of properly.

The Proponent responded that the Operation and Maintenance Plan was revised accordingly. ECCC notes that the Operation and Maintenance Plan was updated to include a reference to the Nunavut Guideline for the Burning and Incineration of Solid Waste. However, Table 6 in the update Operation and Maintenance Plan still includes "Domestic Waste" as a burnable waste (pg. 20). ECCC recommends that the Operation and Maintenance Plan clarify that domestic waste such as food, plastic and textile wastes are not appropriate for open burning.

3. Discharge Bypass Notification

ECCC recommended that the Proponent update the Pangnirtung WWTP Bypass Contingency Plan to include an explanation of what will be done should untreated or partially treated wastewater be discharger during bypass conditions.

ECCC notes the addition of the NWT/NU Spill Report Line to Table 4-2: Additional Agencies (pg. 4). ECCC recommends that the Proponent remove the Environment and Climate Change Canada contact "Environment Canada (867)975-4464" (pg. 4) from Table 4-2 of the updated WWTP Bypass Contingency Plan. The NWT/NU Spill Report Line will involve ECCC Emergencies when appropriate.

- 4. Bioassay Testing
- 5. Location and Extent of Treatment Wetlands; Monitoring Stations
- 6. Spill Contingency Plan ECCC Contact Number

ECCC has no additional comments on topics 4-6.

Should you require further information, please do not hesitate to contact me at (867)669-4732 or Emily.Nichol@canada.ca.

Sincerely,

Emily Nichol

Environmental Assessment Coordinator

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cc: Bradley Summerfield, Senior Environmental Assessment Coordinator Georgina Williston, Head, Environmental Assessment North (NT and NU)