



Table 1 Recommendations/Concerns, Licensee Response and Deadline to Provide Outstanding Information

TRC	Recommendation/Concerns	Licensee Response/Deadline to Provide Additional Information
Crown-Indigenous Relations and Northern Affairs		
R-01	CIRNA recommends the Licensee: <ul style="list-style-type: none"> - provide the name or origin of all water sources for both the 2022 and 2023 calendar years, - the daily, monthly, and annual quantity of freshwater withdrawn from Duval River at Monitoring Station No. PAN-1 is reported for both the 2022 and 2023 calendar years, and - provides reason for any withdrawals from Duval River that took place outside of the months of July and August in the 2022 and 2023 calendar years. 	The Licensee clarified the following: <ul style="list-style-type: none"> - There is only one source of water i.e., the Duval River. - PAN-1 which is the raw water testing point is practically located inside the plant. A flow meter should be installed but there is no electricity, the monthly consumption was reported. - When the snow starts melting, the turbidity increases and the water cannot be extracted. The water is extracted in mid-September when the turbidity goes down.
R-02	CIRNA recommends the Licensee provide details on a reporting system for measuring the quantity of any discharges to and from the Wastewater Treatment Facilities at Monitoring Stations PAN-2 (Raw Sewage from pump-out truck) and PAN-3 (effluent from wastewater treatment plant) in accordance with Schedule H Table 2 of Water licence 3AM-PAN1828.	<ul style="list-style-type: none"> - The former operator has retired and the new operator is in the training phase and has committed to improving the testing protocol from this year onwards. - PAN-2 receives sewage from the truck and there is no mechanism in place to measure the volume.
R-03	CIRNA recommends the Licensee include all dates of discharge in 2022 and 2023 from the Sewage Disposal Facility, and reasoning if Monitoring Program Station PAN-3 analytical results are not available for all discharge dates.	<ul style="list-style-type: none"> - The discharge from the Sewage Disposal Facility is continuous. - There were operational difficulties in testing after the change of operator.
R-04	CIRNA recommends the Licensee include the 2022 and 2023 sludge removal measurements in the 2023 Annual Report, or provide reason for why this was not done.	The sludge is placed in a hopper and disposed of on the landfill site. Accurately measuring the sludge volume is challenging as the hopper may be partially or fully filled at different times. Estimates should be provided in future annual reports.
R-05	CIRNA recommends the Licensee include the 2018 to 2023 Duval River instantaneous flow and mean annual	March 31, 2025

	discharge measurements in the Annual Report, or provide reason for why this was not done. If there are no flow gauges nor levels to monitor the Duval River installed, CIRNA recommends the Licensee provide a timeline for when they will be in compliance with Part D item 6 of water licence 3AM-PAN1828.	
R-06	CIRNA recommends the Licensee submit the 4 updated documents with the 2023 Annual Report, or provide reason for why this has not been done.	The Licensee committed to submitting the plans by December 31, 2024, with the exception of the standalone Drainage/Seepage Monitoring Plan which will be submitted following the completion of the Pilot Project on Community planning by CIRNA.
R-07	CIRNA recommends the Licensee submit the dates when observed discharge flow began and ended at each of Monitoring Program Stations PAN-4, PAN-5 and PAN-6 in 2022 and 2023. CIRNA recommends the Licensee provide reason for why only one analytical result was submitted for each station in 2022, and only PAN-4 in 2023. CIRNA recommends the Licensee report all unauthorized releases of deleterious substances that occurred in 2023.	The Licensee has committed to providing this information in future annual reports.
R-08	CIRNA recommends the Licensee confirm the appropriate flow-metering equipment was installed to accurately record the quantity of water withdrawn from the Duval River in accordance with Part D Item 3 of Water licence 3AM-PAN1828.	March 31, 2025
Environment and Climate Change Canada		
1.	ECCC recommends that seepage from the sludge disposal area and effluent from the WWTP be contained, treated or managed such that poor quality water does not enter waters frequented by fish. Effluent exceedances should be reported as required under the <i>Fisheries Act</i> and NWB licence conditions.	In future annual reports
2.	ECCC recommends the Proponent: - Identify sources of heavy metals and	March 31, 2025

	causes of elevated nitrogen compounds in WWTP effluent; and -Identify options to optimize WWTP process to remove excess metals and nitrogen compounds.	
3.	ECCC recommends the measures be taken to attempt to capture all leachate from the sludge disposal area for appropriate management such that poor quality water does not report to Pagnirtung Fiord.	In future annual reports
4.	ECCC recommends the Proponent sample at the frequency prescribed in their water licence and that future annual reports include explanations of why samples are missing or were not collected, including reporting the absence of runoff.	In future annual reports
5.	ECCC recommends the Proponent report estimates of sludge removed from the Wastewater Treatment Plant in future annual reports.	The sludge is placed in a hopper and disposed of on the landfill site. Accurately measuring the sludge volume is challenging as the hopper may be partially or fully filled at different times. Estimates should be provided in future annual reports.
6.	ECCC recommends the Proponent report estimates of quantities of waste disposed at the landfill in future annual reports.	The Licensee suggested that there is no mechanism in place to measure the volume or weight of waste deposited at the landfill. The Licensee is planning on creating a new waste management plan. Additionally, the funding constraints are making it difficult to comply with the Licence terms and conditions. Estimates should be provided in future annual reports.
7.	ECCC recommends the Proponent correct deficiencies in their future Monitoring Program summary reports, which should be submitted with the annual reports.	In future annual reports

Copies of all documents received during the Annual Reports review can be accessed through the NWB's Public Registry and FTP site using the following link:

<ftp://ftp.nwb-oen.ca/registry/3%20MUNICIPAL/3A/3AM%20-%20Municipality/3AM-PAN1828/3%20TECH/B%20GENERAL/2%20ANNUAL%20RPT/2023>

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

Best regards,

A handwritten signature in black ink, appearing to read 'Nidhi Singh', with a stylized, cursive script.

Nidhi Singh
Technical Advisor
Nunavut Water Board

Enclosure: Comments - CIRNA, ECCC;
Cc: Distribution List – Qikiqtani