



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

ECCC File: 6200 000 019/003
NWB File: 3BM-CAP0810

October 04, 2018

Via email at: licensing@nwb-oen.ca

Ida Porter
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0

Dear Ms. Porter:

RE: 3BM-CAP0810 – Government of Nunavut Community and Government Services (GN CGS) – Hamlet of Cape Dorset – GN CGS's responses to ECCC comments

Environment and Climate Change Canada (ECCC) has reviewed the responses to ECCC comments from the Government of Nunavut Community and Government Services (GN CGS) submitted to the Nunavut Water Board (NWB) regarding the above-mentioned application and is submitting comments via email as requested by NWB. If comments were addressed, no response from ECCC is provided. ECCC's specialist advice is provided based on our mandate, in the context of the *Canadian Environmental Protection Act*, the *Migratory Birds Convention Act*, the *Species at Risk Act* and the pollution prevention provisions of the *Fisheries Act*.

ECCC has the following responses to the Proponent's comments:

ECCC #1 Issue - Wastewater Treatment System – Upgrading Facilities

Proponent's response:

GN GCS response to ECCC #1 was included in the response to ECCC #2, ECCC has responded to the comments separately.

ECCC's response:

ECCC continues to recommend that the licence conditions include the requirement for the GN CGS to provide a plan for upgrading the wastewater treatment facilities, including a full analysis of alternatives and rationale for the preferred option. The GN CGS has confirmed that the P Lake lagoon constructed in 2007 will not be used, and while ECCC acknowledges there are no environmental contaminants associated with this site, plans should still be made for decommissioning and stabilization of the facility.

A licence condition for the submission of a closure and reclamation plan for the 2007 lagoon infrastructure is recommended.

ECCC #2 Issue - Plan for Closure and Reclamation of the 2001 Sewage Disposal Facility and the Emergency Sewage Disposal Facility

Proponent's Response

The 2007 built P –Lake Sewage lagoon site falls within the Transport Canada's new 4km zoning. This facility hasn't been commissioned and was never used as a sewage treatment facility. The water contained within the berm is surface water runoff from the surrounding hills. Cape Dorset has no future plan to use this facility. It will remain this way until we abandon and return the site to its natural state. This facility poses little to no risk to the Environment and Health of the Public.

This facility will not be part of the new water licence.

The Plan for the Abandonment and Restoration (A&R) of the existing lagoons will be developed along with the design Phase of the new WWTP. The implementation of the closure plan will be initiated once the new WWTP is commissioned and successfully operated. The consultant will develop an action plan during the design.

All the documents will be submitted to NWB during amendment of the proposed new Water Licence prior to start construction of the new WWTP.

The RFP is ready for advertisement to hire a consulting firm.

ECCC's Response

ECCC continues to recommends that the renewal licence include the requirement for closure plans to be developed for the currently used facilities, as they will be decommissioned once the mechanical plant is installed. With respect to the new facility GN CGS states that a Request for Proposals will be posted shortly to initiate the new treatment plant; submission of a plan for the upgrades for the Board's review is recommended.

ECCC #3 Issue - Toxicity Testing of Sewage Effluent

Proponent's Response

An accredited lab named Caduceon Lab in Ottawa conducts chemical analysis for this community. This lab and its neighborhood labs in Ottawa do not conduct the Toxicity test for Rainbow Trout. However if it is included in the new licence, a different lab in Winnipeg will be selected for this test. But it is not that easy for this Community to ship out samples to Winnipeg or any other lab outside of Nunavut.

Yes, once the new Mechanical Wastewater Treatment Plant (WWTP) is built and Commission, toxicity testing could be included in the monitoring program and used an indication of treatment performance.

ECCC's Response

With respect to toxicity testing, ECCC maintains its original recommendation. ECCC recommends to the NWB that this be an annual monitoring parameter for the new WWTP once commissioned.

ECCC #5 Issue - Solid Waste Disposal – Management of Hazardous Wastes and Bulky Metals

Proponent's Response

The lower boundary of the waste metal site is protected by a berm so that surface runoff cannot easily or directly run to the sea. The minor beach developed at the lower corner of this berm was repaired.

The Hazardous wastes (batteries) are partially boxed to ship out at any time. Segregation is still in progress.

Right now a metal crusher is being used on daily basis to reduce the metal volume at site. This is the significant and highest achievement in this Community.

CGS is looking forward to reduce the metal volume soon to create more space to accommodate additional metals at the site.

ECCC's Response

GN CGS and the Hamlet are making progress on the management of hazardous and solid wastes, and compliance with the updated solid waste Operations and Maintenance plan (O&M plan) will be important. ECCC still recommends that the licence include a condition to identify plans for compliance with and updated O&M plan.

ECCC #6 Issue - Solid Waste Disposal – New Site

Proponent's response

GN CGS is in the process of advancing this project to identify a new site, obtain regulatory approval, build a new facility and at the same time present the A&R plan of the existing site. The capital budget is not yet identified for this project yet. Therefore an action Plan is not presentable at this moment.

ECCC's Response

ECCC still recommends that the renewal licence include a condition regarding submission of plans for the new solid waste site and for closure and reclamation of the existing sites.

Should you require further information, please do not hesitate to contact me at (867) 669-4744 or eva.walker@canada.ca.

Sincerely,

[Original signed by Eva Walker]

Eva Walker

Environmental Assessment Coordinator

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