

Response to Comments and Recommendations
Water Licence 3BM-CLY1924
May 6, 2025

Supporting documentation referenced in Licensee Response accessible at: <https://app.ca.e-builder.net/public/publicLanding.aspx?QS=e2ef30c03937489d961cb61f20f35990>

Agency	Date	Page(s) No.	Comment / Recommendation ID	Comment / Recommendation	Licensee Response
CIRNAC	Apr-09-2025	5	R-02	CIRNAC notes that it would still be possible to have spill kits on the outside of the building(s) which are likely to have spills or would require a spill kit.	It is preferred that the spill kit be stored indoors, where it is better secured from the weather, wildlife, theft, and vandalism.
CIRNAC	Apr-09-2025	5-6	R-04	CIRNAC notes that the updated mitigative measures for sewage (section 5.4) section does not include a disposal subsection which would be useful for individuals responding to a spill. Please include this section in the next iteration of the plan.	Please see updated Environmental Emergency Spill Contingency Plan.
CIRNAC	Apr-09-2025	8	R-14	CIRNAC notes that section 15 refers to the Application for Water Licence Renewal & Amendment form from the Nunavut Water Board. The above changes should also be reflected in the form. CIRNAC considers the comment resolved once	Please see updated Application for Water Licence Renewal and Amendment.

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				changes are also reflected in the renewal form.	
CIRNAC	Apr-09-2025	9	R-16.2 and 16.14	CIRNAC does not agree with this amendment. The memorandum sent out by the Government of Nunavut would suggest that the amount of waste generated will only be estimates. The concern is that without a proper understanding of the amount of waste being generated it is impossible to determine if existing infrastructure will be capable of holding the waste. If the memorandum is followed it could create significant risks of failures within these waste holding facilities. This could in turn lead to contaminants not contained and therefore potentially ending up into nearby water bodies.	<p>As justified in the memorandum <i>Solid Waste Generation Rates in Nunavut</i>, the proposed estimates are a conservative number, appropriate for sizing solid waste facilities, based on the results from eight waste audits performed in municipalities across Nunavut correlated with published literature and values found in similar municipalities to those in Nunavut.</p> <p>Until such a time that the solid waste facility is upgraded with the necessary infrastructure and a full-time attendant is present, the estimate would be the most accurate value for waste disposed volumes that can be practically provided to meet the water licence requirement.</p> <p>The provided estimates do not change the O&M and spill contingency procedures of the facility, which all waste accepted at the facility will be managed according to best practices to minimize environmental impact.</p>
ECCC	Apr-08-2025	2	Topic: Annual Reports	ECCC recommends that the Proponent collect data from all Surveillance Network Program (SNP) locations in all future sampling years. ECCC recommends that the Proponent prioritize	If the surveillance network program (SNP) refers to the active Monitoring Program stations, the Licensee understands and will work towards fulfilling the Monitoring Program in all future years as per the water licence. Otherwise, please clarify what SNP is.

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				providing more detailed reports in the future that include summaries of annual monitoring data.	Please see the uploaded the Annual Reports from 2019 to 2024, which include all annual monitoring data. Summary tables comparing the effluent quality to the effluent quality limits as per Part D, Item 2 are provided in the Annual Reports. Further details of the monitoring data could be provided in future Annual Reports; however, specific direction on what details are being requested will need to be provided.
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