



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

Your file - Votre référence
3BM-CLY1419
Our file - Notre référence
CIDM#1256357

July 15, 2019

Mr. Richard Dwyer
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
3BM-CLY1419 Renewal Application**

Dear Mr. Dwyer,

Thank you for your June 26, 2019 invitation for review and comment on the above-referenced application.

The Water Resources Division of Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) reviewed the application pursuant to its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

The existing waste site is a non-engineered facility, with the hazardous wastes from the community being stored in a bulk metal/hazardous waste storage area, which is not bermed or lined, and runoff from the facility flows directly into the sewage wetland. CIRNAC notes that the licensee is aware of the potential negative environmental impacts of the existing waste site and has indicated that a new waste site is anticipated within the next three years. However, CIRNAC considers the submitted Hazardous Waste Segregation, Storage and Transportation Procedure a preliminary plan proposal for the future new waste site. It is unclear if this is also the solid waste management plan for the existing waste site. CIRNAC recommends that an interim solid waste management plan be provided by the licensee to manage the existing waste site until the new waste site is in place, and the solid waste management plan is revised.

Should the new waste site be selected at a different location from the existing site, an abandonment and restoration plan would be required.





Sewage is currently trucked to a single cell sewage lagoon for natural treatment before being disposed to a wetland and discharged finally into the sea. CIRNAC notes that no new plan is provided for potential future sewage treatment or management and recommends that the licensee do so as part of its future water and waste management plan.

CIRNAC is aware that the Community and Government Services, Government of Nunavut is currently working on the municipal solid waste management planning and the licences of many municipalities are up for renewal. It would be a good opportunity for the Community and Government Services, Government of Nunavut to develop templates for the various operation and maintenance manuals and management plans required for the water licence application and renewal.

CIRNAC appreciates the opportunity to participate in this review. If there is any question, please contact me at (867) 975-4555 or david.zhong@canada.ca, or Godwin Okonkwo at (867) 975-4550 or godwin.okonkwo@canada.ca.

Sincerely,

David Zhong
Regulatory and Science Advisor