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Dear Jim:

## RE: NWB3COR0207 - Hamlet of Coral Harbour Water License Amendment

As per our telephone conversation in which you indicated that, contrary to the dates in the application, the work in Coral Harbour relating to the above application has not yet been completed, please find below Environment Canada's (EC) comments on this project. The following specialist advice has been provided pursuant to Environment Canada's mandated responsibilities for the enforcement of the Canadian Environmental Protection Act, Section 36(3) of the Fisheries Act, the Migratory Birds Convention Act, and the Species at Risk Act.

The Hamlet of Coral Harbour has applied for an amendment to their current water license for approval for the fencing of the sewage area and the construction of a berm around the sewage deposit area. These amendments are required to help prevent caribou from grazing in the area. While the application states that the work for this project started in July 2002 and was completed by October 31, 2003, the Nunavut Water Board has ascertained that the work has not yet been competed.

The application makes reference to new works planned to upgrade the sewage treatment system and the waste disposal area. Environment Canada would like the opportunity to review any plans prior to their implementation. Further, EC recommends that, if not already in place, an abandonment and restoration plan for the existing sewage treatment area be developed prior to its closure.

Environment Canada recommends that the following conditions be applied throughout all stages of the project:

- The proponent shall not deposit, nor permit the deposit of any fuel, chemicals, wastes or sediment into any water body. According to the Fisheries Act, Section 36(3), the deposition of deleterious substances of any type in water frequented by fish, or in any place under any conditions where the deleterious substance, or any other deleterious substance that results from the deposit of the deleterious substance, may enter any such water, is prohibited.
- Signage indicating the location of the location of the drinking water source, the past and
  present sewage disposal sites, and the old solid waste site and honey bad drop off site
  should be erected.
- If enough cover material is available, EC recommends that the burned garbage be covered at least annually, rather than every two years as it currently the practice.

- The water license application indicates that the current landfill does not segregate
  hazardous materials, such as waste oil and batteries, from the rest of the general waste
  stream. Environment Canada recommends that a secure area, preferably located within
  a berm, be created for the storage of hazardous materials, so as to help prevent the
  potential release of any deleterious substances into the environment. The proponent
  shall ensure that any hazardous wastes are disposed of at an approved facility.
- Environment Canada strongly recommends that the Hamlet take measures to prevent
  the sewage effluent from mixing with the runoff from the solid waste site. Such
  measures could include completely berming the two areas to ensure the segregation of
  the effluent streams. Any runoff from the solid waste facility should be contained within
  the berm until it is shown to be non-deleterious.
- It is not clear from the drawings submitted with the application which berms are currently in place and which are proposed under the new amendment. Environment Canada requests that a drawing clearly indicating this information be submitted. Further, while the "Project Background" description included with the application states that the berm which will be built around the sewage treatment area will be 1 to 1.5 metres high, the drawing indicate that the berm will be 4 metres in height. Environment Canada requests clarification regarding which berm height will be utilized. Given the problems that the Hamlet has had with the effluent from the lagoon mixing with that from the solid waste site, EC recommends that the berm be high enough to contain the sewage within the lagoon and provide for a minimum of 1 metre of freeboard.
- Environment Canada supports the Hamlet's proposal to fence both the sewage lagoon and the solid waste site to prevent caribou from grazing in the area.
- Environment Canada requests further information regarding the new large wetland area onto which the sewage lagoon will be allowed to decant. What is the size of the wetland? Where does it drain into? How will the decant from the lagoon onto the wetland occur? Is the proposed culvert (as indicated on the drawings) to be used for the decant? Is so, how will the Hamlet prevent sedimentation of any water bodies during the decant? Are any erosion prevention measures planned for the area surrounding the intake side of the culvert?
- Environment Canada recommends that the Hamlet develop and implement a Spill
  Contingency Plan, outlining a clear path of response in the event of a spill. This plan
  should include, amoung other items, the placement of spill kits at key locations (such as
  the oil storage area), and a commitment that all spills be documented and reported to
  the NWT 24 hour Spill Line at (867) 920-8130.

If there are any changes in the proposed project, EC should be notified, as further review may be necessary. Please do not hesitate to contact me with any questions or comments with regards to the foregoing at (867) 975-4639 or by email at colette.meloche@ec.gc.ca.

Yours truly,

## Original signed by

Colette Meloche Environmental Assessment Specialist

cc: (Mike Fournier, Northern Environmental Assessment Coordinator, Environment Canada, Yellowknife)