



Nunavut Regional Office
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December 20, 2007

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Licensing Administrator
Nunavut Water Board
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Your file - Votre référence
3BM-COR0207

Our file - Notre référence
IQA-N 9545-2-4CORR / 188056

Re: Water License Renewal – Hamlet of Coral Harbour – GN-Community and Government Services

Indian and Northern Affairs Canada (INAC) reviewed the Renewal Water License Application, submitted to the Nunavut Water Board (NWB) for the Hamlet of Coral Harbour. The following advice has been provided pursuant to INAC's mandated responsibilities for the enforcement of the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* (NW&NSRT) and the *Department of Indian Affairs and Northern Development Act* (DIAND Act). In conducting our review, INAC referred to the documents on the NWB's FTP-site under 3BM-COR. INAC recommends that the NWB take into consideration the following comments when reviewing this Renewal Application.

- The proposed upgrades to the Sewage Disposal Facilities proposes to leave the lagoon as is, with no upgrades to the berms. INAC is concerned that, in letting the berm continue to function as an exfiltration berm, instability may be induced and the berm may be undermined. INAC recommends inspection and contingency plans be prepared to reduce the probability of and to respond to berm failure and provided to the Board.
- Although INAC supports including the natural wetland in the Sewage Disposal Facility, the compliance point/end-of-pipe should be clearly defined and made a point-of-control in order to ensure compliance with the Fisheries Act 36(3). The Licencee should discuss the compliance point with Environment Canada and inform the Board of any agreement.
- As stated in the *Report of the Natural Tundra Wetland Sewage Treatment Facility*, metals have been found within the wetland. This presence of metal is likely stemming from leachate from the Solid Waste Disposal Facility entering the wetland. The Board should be informed by the applicant whether metal levels are within acceptable ranges and of any contingency plans to reduce and/or treat metal found in the leachate.
- The *Report of the Natural Tundra Wetland Sewage Treatment Facility* states that Caribou has been observed in the wetland (p.1-2). INAC suggests that the Board recommends that the applicant consider deterrents, taking into consideration Traditional Knowledge, to lessen the numbers of caribou in the wetland area.



- INAC raised concerns earlier that the carcasses from the Caribou harvest were buried in the Solid Waste Disposal Facility and were contributing to the leachate running into the wetland. However, INAC was reassured through personal communication with GN-CGS in Rankin Inlet that the carcasses are not buried at this location, but buried in the Solid Waste Disposal Facility located by the airport. This second waste storage site should be included in the water licence renewal, including the treatment of any leachate which may also be high in organics.

Should you have any questions or comments, please do not hesitate to contact me at (867) 975-4548 or by email at ReinhartF@inac-ainc.gc.ca.

Sincerely,

Original Signed By

Froeydis Reinhart
Pollution Policy Specialist

Cc. Jim Rogers, Manager of Water Resources – Indian and Northern Affairs Canada,
Nunavut Regional Office
Peter Workman, Environmental Health Specialist