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Department of Environment

Ministère de l'Environnement

Jan. 10, 2008

Richard Dwyer
Licence Administrator
Nunavut Water Board

via Email to: licensingadmin@nunavutwaterboard.org

**RE: NWB FILE # 3BM-COR – HAMLET OF CORAL HARBOUR – WATER
LICENSE RENEWAL APPLICATION**

Dear Mr. Dwyer:

The Government of Nunavut, Department of Environment (DOE) has reviewed the renewal water license application (NWB File No.: 3BM-COR) from the Hamlet of Coral Harbour. The NWB's status report dated Dec. 18, 2007 indicates no operation & maintenance manual as required in the existing water license, has been submitted to date. Additionally, annual monitoring data submitted to the NWB also required in the existing license, has been incomplete. The DOE therefore, recommends that the information be submitted as required.

In addition to the terms and conditions outlined in the existing license (NWB3COR0207) dated Nov. 1, 2002, and additional terms and conditions dated Feb. 17, 2005 for the amendment for the same license, the DOE further recommends the following, based on the DOE mandate under the *Environmental Protection Act*.

A. SEWAGE TREATMENT

Based on page 18 of the *Schematic Design Report: Natural Tundra Wetland Sewage Treatment Area Design*, and the *Water License Application Supplementary Questionnaire For Municipalities*, the applicant is planning to enhance a wetland to treat sewage, but does not intend to repair the existing leaky sewage lagoon. The applicant indicates the leaky lagoon and the treatment wetland to be enhanced will meet the effluent discharge criteria required in the existing water license. The Schematic Design Report indicates compliance to the effluent discharge criteria in the summer of 2007. However, no discussion is provided for potential non-compliance during the winter when raw, untreated sewage may potentially be entering the environment with minimal to no treatment due to a combination of a leaky sewage lagoon and frozen conditions. The DOE suggests that, due to frozen conditions, treatment during the winter will be

virtually non-existent. The DOE therefore recommends that the applicant provides evidence to support their contention that the wetland treatment during the winter months will meet the effluent discharge criteria.

B. SOLID WASTE DISPOSAL FACILITIES

The NWB's status report indicates that no fencing is in place for the landfill. It is important that fencing with signs for the landfill is installed to ensure environmental protection and public safety. In addition, the status report also states that currently there is no containment of leachate at the landfill site. It is important that leachate be treated and tested prior to its discharge to the surrounding environment so contaminants from leachate do not enter the environment.

Finally, the applicant in the *Water Licence Application Supplementary Questionnaire For Municipalities* indicates open burning of wastes is currently carried out at municipal waste sites. The open burning of non-segregated municipal solid waste (MSW) remains a last option for the management of MSW. Continuation of this practice should not be allowed unless a site-specific assessment fails to identify a feasible and practical alternative. In this instance, the DOE accepts that the practicalities of waste disposal in Coral Harbour make it one of the only viable options for waste volume reduction and management. However, the DOE recommends the following:

- The principle of source reduction should be utilized to reduce, reuse and recycle materials otherwise bound for landfill.
- Municipal solid wastes that are conditionally suitable for open burning are paper products, paperboard packing and untreated wood wastes only. Other wastes such as hazardous wastes should be contained in a designated area and be managed appropriately.
- The appropriate materials are segregated and burned in a controlled manner and at a controlled site which is separate from the working landfill so that the fire cannot spread.
- Standard burning conditions shall apply, such as burning on days where winds are light and blowing away from the community.
- Materials are burned in manageable volumes so that fires do not get out of control.
- Having applicable permits for burning.

The DOE thanks the NWB for giving us the opportunity to review and provide comments on the Coral Harbour Hamlet's renewal water license application. Please contact us if you have any questions or comments.

Yours sincerely,

Original signed by

Helen Yeh
Environmental Assessment Coordinator
Department of Environment
Government of Nunavut

