



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

Your file - Votre référence
3BM-GRI1520

October 16, 2020

Our file - Notre référence
CIDM#1290357

Robin Ikkutisluk
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
sent via email: licensing@nwb-oen.ca

Re: Crown-Indigenous Relations and Northern Affairs Canada's reply to applicants response to comments on the Hamlet of Grise Fiord's renewal application for water licence #3BM-GRI1520

Dear Ms. Ikkutisluk,

Thank you for your October 9, 2020 invitation to reply to the applicant's responses to Crown-Indigenous Relations and Northern Affairs Canada's (CIRNAC) technical review comments on the above referenced application. To facilitate cross-referencing, our reply below use the same numbering as our technical comments.

1. Water sources

CIRNAC is satisfied with the applicant's response and appreciates the letter dated October 15, 2020 which makes the request for adding Airport River as a secondary water source explicit for all interveners.

2. Management of solid waste facility

The applicant has provided an updated Solidwaste Operation and Maintenance (O&M) Plan as requested. The new version corrects many of the deficiencies noted and shares results of a feasibility report. However, it does not address some fundamental issues on hazardous waste management, in particular:

- The plan does not specify secondary containment is a requirement for hazardous waste storage. Page 24 of the plan includes a recommendation that a bermed and lined area be constructed without any concrete steps on how this will be accomplished in Grise Fiord.
- Section 7.2.1 on operations for hazardous waste uses the term "should" for activities like fencing and gating, restricting public access, creating a map, storage and many others. This is not sufficient, the manual needs to prescribe how materials will be properly stored and managed.

- No implementation plan for hazardous waste management was found in the updated plan, as required in Part F Item 3d of the current licence. Section 7.2.1 acknowledges current practises do not meet requirements, which is relevant. However it is also important to detail the concrete steps being worked on by the Licensee to improve the situation.

CIRNAC recommends the applicant provide more information on the steps that will be taken to improve hazardous waste storage conditions in Grise Fiord, with a timeline for their implementation.

3. Water quality monitoring

CIRNAC is satisfied with the applicant's response.

4. Water quantity monitoring

CIRNAC is satisfied with the applicant's response. CIRNAC would like to clarify that the flow meter at the intake pipe allows parties to evaluate the potential impact of water withdrawal on stream flow. Providing the fill volume or monthly water use volumes does not impart equivalent information.

5. Updated water supply Operations and Maintenance Plan

Our recommendation was for the submission of an updated O&M Manual for the Water Storage and Pumping system to meet requirements of Part F, Item 5 of the current licence. The applicant has submitted a Spill Contingency Plan, which is a great addition to the application material. It covers some of the requirement as it outlines spill contingency procedures for chemicals kept at the water treatment plant.

However it is not an updated O&M Manual for the water supply. The manual currently available is from 1988 and it is our understanding there may have been several changes to the tanks since then. CIRNAC recommends that the applicant provides information on the current system, specifying which sections of the manual are still applicable today.

6. Applicant signature

The applicant did not respond to this comment.

If there are any questions or concerns, please contact me at (867) 975-3876 or by e-mail at sarah.forte@canada.ca or Godwin Okonkwo at (867) 975-4550 or godwin.okonkwo@canada.ca.

Sincerely,



Sarah Forté
Water Management Specialist