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Department of Environment

Ministère de l'Environnement

July 27, 2009

**Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board**

via Email to: licensing@nunavutwaterboard.org

**RE: NWB FILE # 3BM-KIM 0911 – HAMLET OF KIMMIRUT – WATER
LICENSE AMENDMENT APPLICATION**

Dear Ms. Beaulieu:

The Government of Nunavut, Department of Environment (DOE) has reviewed the water license amendment application from the Hamlet of Kimmirut. Based on DOE's mandate under the *Environmental Protection Act* we have the following comments and recommendations to make.

SOLID WASTE DISPOSAL FACILITY

It is unclear whether fencing is in place for the waste disposal facility. It is important that fencing with proper signage is installed at the facility, as well as near the sewage lagoons, to ensure environmental protection and public safety.

An Operations & Maintenance Manual related to routine operation and maintenance procedures for this facility should also be provided for review.

If open burning of wastes is the current practice, the DOE would like to state that 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. However, the DOE accepts that the practicality of waste disposal in Kimmirut make it one of the only viable options for waste volume reduction and management. Consequently, the DOE recommends the following if open burning is the current practice:

- 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.
- Have applicable permits for burning.

Furthermore, it is important that any leachate from the solid waste disposal facility be treated and tested prior to its discharge to the surrounding environment to prevent contaminants from entering the environment.

ABANDONMENT & RESTORATION

- As the new lagoon is being commissioned, DOE suggests that a preliminary abandonment and restoration plan be provided for review for the old 'lagoon' (the trench site).

SPILL CONTINGENCY PLANNING

- DOE requests that the location of all spill kits be identified and added to the final draft of the spill plan.

GN-DOE thanks NWB for giving us the opportunity to review and provide comments on the Hamlet of Kimmirut's Water License Amendment. Please contact us if you have any further questions or comments.

Yours sincerely,

Original signed by

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