

Agency	Date	Page(s) No.	Comment / Recommendation ID	Comment / Recommendation	Licensee Response
CIRNAC	Apr-30-2026	4	R-01	CIRNAC recommends that the proponent provide stamped design drawings and additional design information to support review of the proposed erosion mitigation measures at the Backwash Pond, including: • core design assumptions (e.g., subgrade condition and stability of the berm substrate); • key design parameters such as slope, riprap size and thickness, material source, hydraulic design basis (e.g., design flows or frequency), and details of anchorage or toe protection; and • identification of anticipated failure modes (e.g., riprap sliding, toe loss, geotextile damage) and justification of how the design addresses these risks. This information would assist CIRNAC in understanding the adequacy of the proposed approach and its likelihood of achieving the stated erosion	Erosion at the Backwash Pond is not identified as a non-compliance item in the Inspectors' reports. The Proponent has taken proactive measures to address the erosion concern associated with the emergency overflow discharge from the Backwash Pond. A geotextile filter cloth and riprap will be installed fall 2026, and these measures have successfully mitigated further erosion since implementation. The installed mitigation measures will continue to be monitored and maintained as part of routine operations and maintenance. The erosion condition is expected to remain mitigated because the overflow channel has a relatively wide cross-section, resulting in low flow velocities despite the temporary peak overflow rate of up to 1,800 L/min during backwash events. The overflow occurs only intermittently and is not expected to generate erosive velocities that would compromise the installed erosion protection. In addition, the overflow consists of filter backwash water, which is not expected to adversely affect the surrounding environment. Consequently, the primary objective of the mitigation measures is to maintain the physical stability of the channel and prevent localized erosion.

				control objectives.	On this basis, the Proponent considers the current erosion control measures to be effective and proportionate to the site conditions.
CIRNAC	Apr-30-2026	4-5	R-02	CIRNAC recommends that the proponent clarify how “routine” inspections and hazardous waste management will be implemented in practice, including consideration of inspection frequency, record-keeping, and handling procedures for used batteries. CIRNAC further recommends that additional detail be provided on how the plan addresses ongoing hazardous waste management requirements, including storage, segregation, and transportation of hazardous wastes to approved facilities, to support long-term compliance with applicable legislative and licence requirements.	Please see the revised compliance implementation plan below: 5.4 Battery Storage Compliance Objective: Maintain compliant hazardous waste storage. Actions: • Continue storing used batteries in designated poly-lined containment units within the hazardous waste storage area. • Segregate used batteries from general waste and separate lithium batteries from other battery types. Exposed terminals on lithium batteries will be covered or taped to prevent short circuits, and damaged lithium batteries will be isolated in appropriate non-combustible containers. • Maintain clear signage and public awareness to encourage proper battery disposal. • Conduct monthly inspections of battery storage areas from the spring to fall to ensure compliance • Transport used batteries to an approved recycling or disposal facility in

					accordance with applicable territorial requirements and operational logistics when sufficient quantities are accumulated – contingent on funding and capacity. Timeline: • Extensive earthworks at the waste facility were completed in the spring to improve drainage and overall site efficiency to address ongoing hazardous waste management requirements. • Signage to be implemented fall 2026. • Inspections, segregation, and proper storage on an ongoing basis • Facility to be maintained according to the water licence and to the satisfaction of the Inspector on an ongoing basis
CIRNAC	Apr-30-2026	5-6	R-03	CIRNAC recommends that the proponent submit the Land Farm Remedial Action Plan for regulatory review as proposed, in advance of any planned field activities, to allow regulators to assess the scope, methods, and compliance of the proposed works. CIRNAC reminds the proponent that remediation activities not authorized by the	The Proponent will submit an updated Plan for the Solid Waste Disposal Facility for review and approval by regulators as per Part F, Item 2 of the water licence. The Plan will detail the remediation objectives, methods, monitoring, and expected timelines for remediating the existing contaminated soil at the land farm facility. The Plan will be submitted by November 30, 2026. As per the AR Plan (Hamlet of Kugluktuk, 2026), the planned field activities to be implemented in 2026 to comply with the water

				current licence should not be undertaken at the land farm until the plan has been reviewed and approved by the Nunavut Water Board.	licence and Inspectors' requests remain to: • Conduct post-fire cleanup • Remove and dispose of all drums and containers. • Incinerate petroleum products from compromised containers and dispose of all compromised containers following incineration. • Inspect liner for damage and repair as necessary • Stockpile contaminated soil, which is anticipated to be remediated at the landfarm following approval of the Solid Waste Disposal Facility Plan that will be drafted in 2026
CIRNAC	Apr-30-2026	6	R-04	CIRNAC recommends that the proponent clarify the status of the non-compliance items identified in the 2024 Inspection Report, including whether the actions required have been completed or, if not, how and when they are proposed to be addressed. CIRNAC further recommends that the AR Plan propose remediation measures to all outstanding inspection findings, to ensure compliance with Water Licence conditions.	<u>Flowmeter on wastewater decanting line:</u> The proponent will not be installing a flow meter on the wastewater decanting line. The Monitoring Program as per Part H, Item 1 requests for the volume of raw sewage disposal from the truck to the lagoon, rather than the decanting line. <u>Sewage lagoon leakage, cracking, slumping and erosion:</u> The observed leakage, cracking, slumping, liner displacement, and associated erosion at the existing sewage lagoon require a detailed geotechnical and engineering assessment to determine the underlying causes, evaluate the extent of the issues, and identify appropriate remedial measures. As such, a site-specific remedial action plan cannot be developed until the necessary investigations have been completed.

					The Government of Nunavut – Department of Community Services is seeking funding in the 2026–2027 fiscal year to undertake the required engineering and geotechnical investigations and develop a remedial action plan for the existing sewage lagoon. Subject to funding approval, the Proponent anticipates submitting the remedial action plan by March 31, 2027, with the 2026 Annual Report. Separately, the Government of Nunavut is undertaking a business case to evaluate the development of a replacement sewage lagoon at a new site. The business case is expected to be completed in 2027, after which detailed design of the preferred option would proceed, subject to funding and regulatory approvals. <u>Segregation and Consolidation of hazardous Wastes and White Wastes:</u> 2026 Hazardous Waste and White Waste Consolidation Plan Objective: Consolidation and segregation of hazardous wastes and white wastes. Actions: • Conduct a site-wide inspection of the Solid Waste Disposal Facility to identify hazardous wastes and white wastes • Consolidate and sort hazardous wastes, including waste fuels and batteries, within the designated storage area for containment and shipment preparation.
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Response to Comments and Recommendations
Water Licence 3BM-KUG2030
July 13, 2026

					• Conduct a follow-up inspection to verify that waste segregation has been maintained and address any deficiencies identified. Progress to Date: • Placed used batteries in properly sealed containers, and relocated them to the hazardous waste area as requested. • Burned propane tanks were removed from the landfarm disposed of appropriately. Target Completion: Fall 2026
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