



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
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Your file - Votre référence
3BM-NAU2333
Our file - Notre référence
GC Docs # : 112210941

May 5, 2023

Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: Licensing@nwb-oen.ca

**Re: Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) Review of
Plans for the Municipality of Naujaat, Type B Water Licence No. 3BM-NAU2333**

Dear Mr. Dwyer,

Thank you for your March 27, 2023 invitation to review the plans for Municipality of Naujaat, Type B Water Licence no. 3BM-NAU2333.

CIRNAC examined the plans pursuant to its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*. Please find CIRNAC's comments and recommendations in the attached Technical Review Memorandum.

If there are any questions or concerns, please contact me at (867) 975-4282 or Christine.Wilson3@rcaanc-cirnac.gc.ca

Regards,

Christine Wilson,
Industrial Coordinator



Technical Review Memorandum

Date: May 5, 2023

To: Richard Dwyer – Manager of Licensing, Nunavut Water Board

From: Christine Wilson – Industrial Coordinator, CIRNAC

**Subject: Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)
Review of Plans the Municipality of Naujaat, Type B Water Licence No.
3BM-NAU2333**

A. BACKGROUND

The Municipality of Naujaat is located within the Kivalliq Region, Nunavut, on the northern shore of Repulse Bay, on the south shore of the Rae Isthmus, at the geographical coordinates 66° 31' N and 86° 14' W. The Municipality operates a water supply facility and solid and sewage waste management facilities under the Type B Municipal Licence No. 3BM-NAU2333.

The Government of Nunavut, Community of Government Services (GN-CGS) submitted, on behalf of the Municipality of Naujaat, the following plans for review:

- O&M Plan for Solid Waste Disposal Facilities
- Environmental Emergency & Spill Contingency Plan
- Environmental Monitoring & Quality Assurance/Quality Control Plan
- O&M Plan for Sewage Disposal Facilities
- O&M Plan for Water Supply Facilities

CIRNAC provided the following comments and recommendations pertaining to the Plans. A summary of the subjects of recommendations can be found in Table 1. Documents reviewed as part of the submissions can be found in Table 2 of Section B. Detailed technical review comments and requests for clarification can be found in Section C.



Table 1: Summary of Recommendations

Recommendation Number	Subject
R-01	Environmental Emergency Contingency Plan, Spills
R-02	Environmental Emergency Contingency Plan, 30 Day Follow-up Report
R-03	QA/QC Plan- Incomplete
R-04	Solid Waste Management Plan



B. DOCUMENTS REVIEWED AND REFERENCED

The following table (Table 2) provides a list of the documents reviewed under the submission and referenced during the review.

Document Title	Author, File No., Rev., Date
Environmental Emergency and Spill Contingency Plan 2023	Community and Government Services, March 2023
Environmental Monitoring and QAQC Plan	Community and Government Services, January 2021
OM Plan Sewage Naujaat 2022	Community and Government Services, December 13, 2022
OM Plan Solid Waste Naujaat 2023	Community and Government Services, March 27, 2023
OM Plan Water Supply Naujaat 2022	Community and Government Services, December 13, 2022
Plan for Compliance 2023	Community and Government Services, December 13, 2022
Water Licence 3BM-NAU2126 Inspection Report	CIRNAC, [2021-KIV07-AS] October 29, 2021
3BM-NAU2333 Renewal Licence	Nunavut Water Board, March 8, 2023



1. Environmental Emergency Contingency Plan- Spills

Section 5.2 titled “*Environmental and Human Health Protection and Mitigation Measures-General Procedures*” includes directions for the Licensee to consult with Environment and Climate Change Canada regarding clean-up methods when spills occur within the community.

Comment: In accordance with the Spills Working Agreement, Crown-Indigenous Relations and Northern Affairs Canada is the designated lead agency on spills which occur at facilities authorized by federal legislation. This means that if a spill occurs at any facility authorized by the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* under the water licence (e.g.: solid waste management areas, sewage treatment plants or water supply facilities) CIRNAC would be the agency to consult.

Recommendation: (R-01) CIRNAC recommends that the plan is amended to include the correct contact as CIRNAC for spills at facilities authorized by the water licence and include the on-call Inspector contact telephone number 867-975-4284.

2. Environment Emergency Contingency Plan- 30 Day Follow-up Report

On the bottom of page 7 under the heading “*Emergency Response Flow Chart*” the last box reads that a spill report form needs to be completed and submitted within 30 days of a spill event.

Comment: In accordance with PART F item 7(b), the Licensee is required to report spills immediately to the NWT-NU 24-Hour Spill Reporting Line and an Inspector.

Part F item 7(c) requires the Licensee to provide a detailed report of the event which includes the information prescribed in that condition. This report is to be submitted to the Inspector no later than 30 days following the event.

Recommendation: (R-02) CIRNAC recommends that the plan be amended to meet the conditions of the current water licence and resubmitted to the Board. CIRNAC has no further concerns related to the plan.

3. QA/QC Plan- Incomplete

On page 3, below table 2, the text reads “*Samples shall be taken at the same location during each sampling event. If flow volumes are not sufficient to collect a sample at sampling locations ARV-3, ARV-5 and ARV-6, sampling may be collected upstream of the locations where adequate flow volumes exist.*”

At the end of the document the figures and appendix A, B, and C are missing.



Comment: The monitoring program station identification for 3BM-NAU2333 are REP-1 through to REP-6. The locations are to be updated to reflect the monitoring stations found in the licence.

Recommendation: (R-03) CIRNAC recommends that the complete plan be resubmitted to the Board for review.

4. Solid Waste Management Plan

Section 6.0 Maintenance states *“Annual inspections will be undertaken by Crown Indigenous Relations and Affairs Canada (CIRNAC) accompanied by a licensee and/or a licensee representative from GN-CGS. The inspection report and recommendations will be reviewed by a GN-CGS municipal engineer and submitted in the Annual Report submitted to the Nunavut Water Board (NWB).”*

Comment: On March 29th CIRNAC met with GN-CGS to discuss CIRNAC's role as it relates to inspections. As expressed on March 29th, CIRNAC water licence inspection reports are solely to identify compliance related issues and at no time will replace an inspection by an engineer. CIRNAC will not accept plans for review which imply that CIRNAC's inspection report will be used as an monitoring/ maintenance indicator for inspection by a GN-CGS municipal or geotechnical engineer.

Recommendation: (R-04) CIRNAC recommends that any plans containing this language the be updated and resubmitted to the Board for review.