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November 28, 2002

Phyllis Beaulieu  
Acting Licensing Administrator  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, NU, X0E 1J0

Your file - Votre référence

**NWB3PAN**

Our file - Notre référence

Sent by email to:

nwblic@polarnet.ca

### **Amendment to Pangnirtung Water Licence Application**

On behalf of Indian and Northern Affairs Canada (INAC), I have reviewed the amendment to the Municipality of Pangnirtung's application for a water licence. I therefore present to the Nunavut Water Board the following comments and concerns.

From a water perspective, INAC has no objection to including the offal from the Pangnirtung Fisheries Turbot processing operation in the municipal landfill within a disposal pit dug within the permafrost. However, this addition will create a relatively concentrated area of organic materials in the landfill. We would therefore suggest that the monitoring of the landfill effluent include BOD and fecal coliform parameters, at least for the first few years.

The amendment mentions that the Municipality plans on using permafrost to encapsulate the fish offal. However, there is also the mention of using calcium to help the offal degrade. If the offal will be in a frozen state, will there be really be any degradation? If not, is it worth placing the calcium on the fish offal? Note, however, that INAC does agree that calcium should be used if the offal is currently not in a frozen state, such as any fish offal exposed during the warmer summer months.

Finally, our acceptance of this proposal is contingent on the proposed temporary duration of the disposal of the fish offal. Should the municipality be unable to obtain a de-boner and plate freezer in the next couple of years, as anticipated, this proposal will likely have to be re-evaluated to determine the capabilities of the landfill to contain the volume generated by a long term disposal of fish offal in a disposal pit.

If you have any concerns or questions, please feel free to contact me.

Sincerely,

*Original Signed By: Michael Roy*

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