



Water Resources Division
Nunavut Regional Office
Iqaluit, NU X0A 0H0

Our File: 9545-1447(N5L4) / CIDMS 198069

Your File: 3BM-PAN0207

~~February 15, 2007~~

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Richard Dwyer
Licence Administrator
Nunavut Water Board
Gjoa Haven, NU X0B 1J0

**Re: 3BM-PAN0207 / Hamlet of Pangnirtung / Qikiqtani Region / Licence
Renewal Application**

On behalf of Indian and Northern Affairs Canada (INAC), I have reviewed the above mentioned water licence renewal application submitted by the Government of Nunavut on behalf of the Hamlet of Pangnirtung, the Licensee. The following advice has been provided pursuant to INAC's mandated responsibilities for the enforcement of the Nunavut Waters and Nunavut Surface Rights Tribunal Act and the Department of Indian Affairs and Northern Development Act.

Indian and Northern Affairs Canada recommends that the Nunavut Water Board (NWB) consider the following comments when reviewing the submitted Type B water licence renewal application:

1. The Hamlet of Pangnirtung should provide a signed letter stating that the Government of Nunavut's Department of Community and Government Services is acting on its behalf for the submission of its municipal licence renewal application.
2. The submitted Water Licence Application Form is considered incomplete in its current state. This Form can be improved by addressing these points:
 - a. *Item 3: Location of Undertaking.*
 - The text provided within this section is not applicable to a licence renewal application. The location of the Hamlet of Pangnirtung should be specified not the fact that a comprehensive performance of WWTP (no definition of WWTP has been provided) optimization and feasibility study on solid waste management have been undertaken.
 - The NTS Map Sheet No. and corresponding Scale for this community should be identified.

- b. *Item 4: Description of Undertaking.*

- The submitted description is irrelevant to the purpose of a licence renewal application. The description of undertaking provided to the NWB addresses plant modification (no definition for the term plan has been provided) and further optimization.
- c. *Item 5: Type of Primary Undertaking.*
- The Applicant is required to submit a water licence questionnaire because the specified type of primary undertaking is municipal. A completed questionnaire must be submitted for review.
- d. *Item 6: Water Use.*
- The Applicant has stated that water use within the Hamlet of Pangnirtung is specific to water consumption. INAC questions whether other water uses are practiced. Municipalities often have other impacts on water due to their environmental footprint (e.g., construction of ditches and bridges). The Applicant should assess all water uses within the Hamlet of Pangnirtung and ensure that this item of the Form has been properly completed.
- e. *Item 7: Quantity of Water Involved.*
- The Applicant has not specified the quantity of water that will be consumed on a daily basis and has not categorized this quantity by sources of demand.
- f. *Item 8: Waste.*
- The Applicant has indicated that waste produced within the Hamlet of Pangnirtung can be classified as sewage, solid waste, and sludge. Typically, municipalities produce other wastes that are classified as hazardous, bulky items/scrap metals, waste oil, and greywater. In the case of Pangnirtung, fish offal wastes are produced from a local fish processing plant. The Applicant should carefully consider all types of wastes produced within the Hamlet of Pangnirtung and make them known in this Form.
- g. *Item 10: Predicted Environmental Impacts of Undertakings and Proposed Mitigation Measures.*
- The Applicant has indicated that the Nunavut Impact Review Board (NIRB) conducted an environmental impact assessment of the Hamlet of Pangnirtung's municipal activities. The NIRB review code for this assessment should be made known.
- h. *Item 15: Proposed Time Schedule.*

- The Applicant should specify the start date and completion date of its proposed water licence.
3. The Applicant should provide a complete licence renewal application for review. This entails copies of all plans and information relevant to municipal undertakings associated with water use and waste disposal [e.g., freshwater intake design, waste water treatment facility design, solid waste treatment facility design, fuel containment facility design, quarry design(s), spill contingency plan, Quality Assurance/Quality Control (QA/QC) Plan, etc.].
 4. Upon review of the expired NWB3PAN0207 licence, INAC has identified certain plans that were required for submission to the NWB to ensure the Licensee's compliance with licence terms and conditions. To date, INAC cannot locate the following plans. These plans should be submitted for review and approval by the NWB. The identified plans are organized by their respective licence items.
 - a. *Part D: Conditions Applying to Waste Disposal. Item 4.*
 - The Licensee was required to submit, within 30 days of the issuance of the NWB3PAN0207 licence, a plan for the disposal of bagged sewage sludge and screenings from the Sewage Treatment Facility.
 - b. *Part F: Conditions Applying to Operation and Maintenance. Item 1.*
 - The Licensee was required to submit, before December 1, 2003, a plan for the Operation and Maintenance of the Sewage and Solid Waste Disposal Facilities in accordance with the Guidelines for Preparing an Operation and Maintenance Manual for Sewage and Solid Waste Disposal Facilities (1996).
 5. A Spill Contingency Plan applicable to the management of hazardous material spills should be provided for review and approval.
 6. The Applicant should provide a QA/QC Plan. This would demonstrate to reviewers that a Plan is in place to ensure that samples taken in the field as part of the licence surveillance network program maintain a high quality, so as to accurately represent the physical and chemical nature of the samples being taken. Part H: Conditions Applying to the Monitoring Program, Item 6 of the NWB3PAN0207 licence states that a QA/QC Plan can be provided to the Licensee by the NWB. The Licensee should make sure it has a copy of this Plan.
 7. The Licensee should develop a plan to address its future compliance with the terms and conditions set by Part B: General Conditions, Item 1 of the NWB3PAN0207 licence under a renewed municipal licence.
 8. The Applicant has provided a report titled Feasibility Study on Solid Waste Management in Pangnirtung, NU that was prepared by Dillon Consulting Ltd. in

September 2007. This report is informative but not relevant to the Hamlet of Pangnirtung's licence renewal application. A licence amendment application must be submitted if the Licensee wants to construct a new solid waste management facility. This licence amendment application should include final design plans for the proposed solid waste management facility, an operation and maintenance plan, and an abandonment and reclamation plan for the current solid waste disposal facility.

9. The Applicant has provided a draft report titled Pangnirtung Waste Water Treatment Plant: Comprehensive Performance Evaluation that was prepared by Dillon Consulting Ltd. in August 2007. This report is informative but not relevant to the Hamlet of Pangnirtung's licence renewal application. A licence amendment application must be submitted if the Licensee intends to make changes to the design of its Waste Water Treatment Plant. This amendment should clearly specify the proposed design changes and a revised operation and maintenance plan for the Waste Water Treatment Plant.
10. The Licensee should ensure that effective public consultation is practiced within the Hamlet of Pangnirtung for any proposed licence amendments. All members of the community should have an opportunity to become familiar with the Hamlet's freshwater management and waste treatment intentions. Detailed minutes of public consultations should be prepared and provided to the NWB upon request.

Indian and Northern Affairs Canada requests notification of any changes in the proposed licence renewal application, as further review may be necessary. Please contact me should you have any questions or comments with regards to the foregoing. I can be reached by telephone at (867) 975-4555 or by email at AbernethyD@inac-ainc.gc.ca.

Regards,

Original signed by

David W. Abernethy
Regional Coordinator

Cc. Jim Rogers, Manager of Water Resources – Indian and Northern Affairs Canada,
Nunavut Regional Office