



Your file - Votre référence
3BM-PAN1417

June 7, 2017

Our file - Notre référence
IQALUIT-#1150378

Licensing Department
Nunavut Water Board
P.O. Box 119
GJOA HAVEN, NU, X0B 1J0

Sent via email: licensing@nwb-oen.ca

Re: Completeness Assessment and Initial Technical Assessment of Water Licence Renewal and Change to Type 'A' Water Licence – Hamlet of Pangnirtung (3BM-PAN1417)

To Whom It May Concern,

Thank you for the Nunavut Water Board's May 17, 2017 notice of the above mentioned Water Licence application. A memorandum is provided for the Nunavut Water Board's consideration. Comments and recommendations have been provided pursuant to Indigenous and Northern Affairs Canada's mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

Please do not hesitate to contact us by telephone at the phone numbers or email addresses listed below for further information.

Sincerely,

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Encl.

Cc. Ian Parsons, A/Manager, Water Resources Division - INAC, Nunavut Regional Office (NRO)
Karen Costello, Director, Resource Management Directorate – INAC, NRO
Erik Allain, Manager, Field Operations Division– INAC, NRO

Memorandum

To: Licensing Department, Nunavut Water Board

From: Amanda Winegardner, Water Management Specialist, INAC, NRO

Cc: Ian Parsons (INAC; NRO), Karen Costello (INAC; NRO), Erik Allain (INAC; NRO)

Date: June 6, 2017

Re: Completeness Assessment of Application for Renewal and Change to Type 'A' Water Licence No. 3BM-PAN1417

Applicant: Hamlet of Pangnirtung
Representative: Community and Government Services, Government of Nunavut
Project: Hamlet of Pangnirtung
Region: Qikiqtani

A. Background

On May 17, 2017, the Nunavut Water Board (NWB or Board) distributed an Application submitted by the Government of Nunavut's Community and Government Services (GN-CGS) on behalf of the Hamlet of Pangnirtung (the Licensee; Applicant) for renewal of 3BM-PAN1417 and subsequent change to a Type 'A' Water Licence. This Type 'A' Water Licence is to cover use of water and disposal of waste in the Hamlet.

The Duval River is the water source under 3BM-PAN1417. Since the river does not flow in the winter months, water is pumped from the river to a constructed water storage reservoir during the ice-free months in order to ensure consistent water supply throughout the year. During the last renewal of 3BM-PAN1417 in 2014, it was noted that daily water use might be greater than 300 m³ per day when filling the water storage reservoir. A three year water licence term (until September 2017) was granted to allow the Licensee time to measure water use during reservoir filling and to confirm whether a Type 'A' Water Licence was required. The Licensee has confirmed, based on reservoir size and time spent to fill the reservoir during the ice-free months that daily water use (extraction) does exceed 300 m³ per day during reservoir filling (even though water consumption is estimated to be only 138 m³ per day). As such, the renewal application is for a Type 'A' Water Licence.

Interested parties were asked to submit comments on the completeness of the Application, Information Requests (IRs) to be submitted to the NWB. The Application included the following documents available on the NWB's public registry:

- Type 'A' Water Licence Application form and letter confirming change to Type 'A'

Water Licence

- Screening Decision Report from the Nunavut Impact Review Board
- Plain language description of Application
- Applicant response to initial completeness review by the NWB
- Management and emergency plans, including:
 - Spill Contingency Plan (dated October 2016)
 - Wastewater Treatment Plant Bypass Contingency Plan (dated October 2016)
 - Fish Process Plant Waste Management Plan (dated April 2017)
 - Solid Waste Operation and Maintenance Plan (dated June 2014)

In addition to the re-classification of this Water Licence to a Type 'A', the Licensee is requesting a licence term of 10 years (valid until September 2027).

B. Results of review

On behalf of INAC's Water Resources Division, the following comments and recommendations are provided for consideration:

General comments relating to completeness and initial technical review

1. Application completeness

INAC considers the Application to be complete with the exception of some recommendations and Information Requests outlined in this memorandum. Materials submitted already as part of the current Application and those submitted as responses to Information Requests will be evaluated more extensively during the technical review stage.

2. Old sewage lagoon facility

Source:

- 1) 3BM-PAN1417 Proponent response to NWBs correspondence

Comment: The Applicant has indicated that the old sewage lagoon is no longer in use due to the commissioning of the Wastewater Treatment Plant. However, this facility has not been decommissioned and decommissioning will not be completed for another 1-2 years depending on the performance of the Wastewater Treatment Plant.

Recommendation #1: INAC recommends that the old sewage lagoon remain under a renewed licence until such time as it is decommissioned and the Licensee submits an amendment application to remove the facility.

3. Monitoring results submitted as part of Annual Reports

Source:

- 1) 'Annual Report' folder un NWB public registry
- 2) 3BM-PAN1417 Amendment Renewal Licence, Part H: 'Conditions Applying to the Monitoring Program'

Comment: INAC notes that there are monitoring results submitted with recent annual reports for 3BM-PAN1417. However, these results are generally not referred to in the annual reports and are just reports from the analytical laboratory. Additionally, the samples in the laboratory reports do not seem to correspond to the monitoring program station numbers outlined in Part H of the current Water Licence.

Recommendation #2: INAC recommends that monitoring results submitted as laboratory reports be referenced in annual reports to facilitate interpretation. Additionally, samplers should use the naming conventions outlined in the Water Licence to ensure that compliance can be accurately assessed.

4. Licence term

The Applicant has asked for a Water Licence term of 10 years. INAC will provide a recommendation on Water Licence term at the technical review stage.

Information Requests

INAC's Water Resources Division requests the following information:

1. **INAC-IR#1:** Submit a revised Operation and Maintenance Manual for the Pangnirtung Truck Fill Station.

Context: The Applicant submitted an Operation and Maintenance Manual for the Pangnirtung Truck Fill Station with their Water Licence Application. However, the manual is not written in a way that allows for a clear understanding of how the truck fill station will be operated to meet Water Licence requirements. The Applicant indicated in correspondence with the NWB that a revised manual was being prepared based on calibration of the new Water Treatment Plant and would be completed within three months of May 4, 2017. The revised plan should be provided by the Applicant once it is ready for technical review. This plan is valuable to the technical review stage of the licence renewal process and should be submitted. However, if this plan is not available for the review phase of the process then completion of the plan with a specified time period should be included as a term and condition of the renewed Water Licence.

2. **INAC-IR#2:** Provide details of the planned hydrology study for the Duval River as well as any additional details available on the characteristics of the Duval River that will allow it to sustain the proposed water use.

Context: In correspondence with the NWB, the Applicant has indicated that there was a 1975 study completed by McMaster University on the Duval River which included drainage area and net discharge. The Applicant is encouraged to provide any other data that might be available (for example, historical hydrometric data) that would allow for assessment of the Duval River as a water source for the reservoir.

The Applicant has indicated they intend to undertake a hydrology study of the Duval River in 2017-2018. If this is completed in time for the technical review stage of this Application, it should be provided for review. If the study is not available, the Applicant should provide details on the planned study, e.g. objectives, questions, methodology and relevance to this application process. Additionally, the Applicant should provide an anticipated timeline of the planned study.

3. **INAC-IR#3:** Submit an Operation and Maintenance plan for the process of filling the water storage reservoir.

Context: No Operation and Maintenance plan was located for the process of filling the water storage reservoir. Since reservoir filling is an important part of operations under 3BM-PAN1417, an Operation and Maintenance plan for this process is required for the technical review of the Application.

4. **INAC-IR#4:** Provide any available details on the Capital Project scheduled for 2020-2021.

Context: The Applicant has indicated that there is a Capital Project scheduled for 2020-2021 focused on waste management, and that this project will result in an amendment to the requested Water Licence. While the Capital Project is likely still in preliminary planning stages, providing any available details about what is planned for this project will be helpful during the technical review stage.

5. **INAC-IR#5:** Provide updated Solid Waste Operation and Maintenance plan.

Context: The Solid Waste Operation and Maintenance Plan available on the NWB public registry was last updated in June, 2014. In the Applicant's correspondence with the NWB during the NWB's initial completeness review, there is mention of an updated version though this does not appear to be on the public registry. Please provide the most updated version of this plan.