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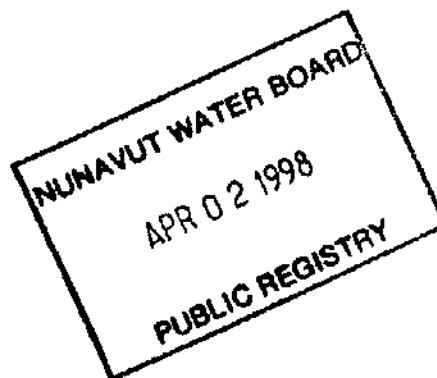
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Date	APR. 1/98	# of pages	2
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File: 4782 019 PELLY BAY WATER LICENCE - NEW APPLICATION

April 1, 1998.

Mr. David Porter
Licence Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NT. XOE 1JO

**Pelly Bay Water Licence, NWB3PEL**

I am responding to your letter, dated 23 February 1998, requesting comments on the water licence application by the Hamlet of Pelly Bay, NWB3PEL. I received and reviewed the following documents relating to the application:

- Water Licence Application Form.
- Supplementary Questionnaire for Municipalities, including Figures 1 to 15.
- August 1997 Inspection Report.
- 1986 Dillon Consulting Report.

The sewage treatment facility and waste oil (hazardous material) storage site are two components of the application which are of particular interest and potential concern to Environment Canada. Both facilities may potentially affect fish pursuant to Section 36 of the *Fisheries Act* as well as general water quality, particularly in the vicinity of the community. However, I found it difficult to understand what facilities are currently in place and the modifications or new construction which may be planned for the sewage treatment facility and waste oil storage site. In addition, there was no environmental information (e.g. local terrain, slope, drainage systems and water bodies) to support an adequate review and assessment of proposed modifications or new construction.

I was also puzzled by what appeared to be contradictory information on the sewage treatment facility in the Water Licence Application and Supplementary Questionnaire. Specifically, on Page 8 (Supplementary Questionnaire), Item 1 under the Modifications Section, the applicant indicates that there are no "changes planned in the sewage treatment facilities". However, Figure 6 is entitled, "Proposed Sewage Lagoon" -



suggesting changes are planned. What is the situation? If changes are planned, what are the nature of those changes and how will they improve upon the current facility.

Other areas of the application were also unclear. For example:

- Figure 10 (Supplementary Questionnaire) identifies a "proposed honey bag pit". However, on Page 6 of the Supplementary Questionnaire, the application indicates the municipality does not use a honey bag pit. Again, what is the situation?
- Page 2 (Water Application) states that there are "potential effects on the marine environment due to sewage effluent discharge area". However, there is no information as to the distance to the marine environment and nature of the terrain. Is the risk due to the "unsatisfactory" nature of the sewage treatment facility berms (Page 7, Supplementary Questionnaire), proposed changes to the sewage treatment facility (Figure 6) or other factors?
- Page 16 (Supplementary Questionnaire) indicates that the applicant plans to undertake baseline data collection and evaluation of the various biophysical components of the environment potentially affected by the project. However, there is no information on what studies are planned. This information would be useful.

On a more positive note, I was pleased to see that the hamlet proposes to change its bylaws to ensure controlled (segregated?) disposal at the dump site, erect fencing to contain the spread of solids under windy conditions and install a waste oil furnace. I have no comments or concerns with the proposed changes to the water intake pipe.

I would be very interested in discussing this application with you, particularly in regards to the lack of baseline information and true nature of proposed changes for the sewage treatment facility and waste oil pit.



Carey Ogilvie
Environmental Assessment Coordinator
Environmental Protection Branch

- c. Mr. Stephen Harbicht
Mr. Ed Collins
Ms. Laura Johnston