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Your file - Votre référence  
NWB file # 3BM-PON  
Our file - Notre référence  
File#9545-1638(N5L3) / CIDMS#162140

August 16th, 2007

Phyllis Beaulieu  
Licensing Administrator  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, NU, X0A 1J0

**Re: Amendment Application – Landfarm – Hamlet of Pond Inlet**

Indian and Northern Affairs Canada (INAC) have performed a review of the Pond Inlet Landfarm Amendment Application, submitted to the Nunavut Water Board (NWB). In conducting our review INAC has made reference to all documents in the 3BM-PON file on the FTP-site.

The project description states “*no site specific information was used for the design of the landfarm.*” Though the proposed landfarm is a relatively small piece of municipal infrastructure, the nature of the above statement could be interpreted as indicating there will no set back from surface waters or there is no relationship to current land use practices. INAC requests the applicant expand on this point and provide rationale for why site specific information was not used in the landfarm design.

INAC is uncertain as to why the document titled Proposed Landfarm Design and Specifications is posted on the FTP-site. It would appear that this document was intended to guide the applicant and their consultant through the design and construction process. INAC does not consider this document to represent the Final Design Plan for this project. INAC requests the NWB require the applicant to submit a Final Design Plan which includes discussion on design rationale. Moreover, INAC encourages the NWB to remind the applicant that information management is their responsibility. From a reviewer’s perspective, sound information management improves the pace at which applications can be reviewed.

INAC has noted the following documentation was not included in the information presented on the NWB’s FTP-site under the 3BM-PON file: Water License Application-Supplementary Information Requirements for Hydrocarbon-Impacted Soil Storage and Landfarm Treatment Facilities. Given the above comments and the nature of the application INAC feels it is essential the applicant submit a Supplementary Information Requirements for Hydrocarbon-Impacted Soil Storage and Landfarm Treatment Facilities document to the NWB for review. Specifically, INAC would like to draw attention to the information required under Section II,

Technical Information Required to Process the Application. INAC notes that the information requested under Section II has not been provided in the current application.

Finally, Section 15, Proposed Time Schedule, of the Water Licence Amendment Form does not list a project start or completion date. INAC requests the NWB clarify this with the applicant. INAC suggests the length of the amendment be consistent with other municipal licenses and not exceed 5 years.

Should you have any questions or comments, please do not hesitate to contact me at (867) 975-4548 or by email at [BathoryS@ainc-ianc.gc.ca](mailto:BathoryS@ainc-ianc.gc.ca).

Sincerely,

*Original Signed By*

Stephen Bathory  
Regional Coordinator