



June 13, 2014

Your file - Votre référence
3BM-QIK0712

Our file - Notre référence
IQLAUIT-# 805852

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board
Gjoa Haven, NU X0E 1J0

**Re: Aboriginal Affairs and Northern Development Canada Review of the Hamlet of
Qikiqtarjuaq's Application to Renew Water Licence #3BM-QIK0712**

Dear Ms. Beaulieu:

Thank you for your email of May 13, 2014, concerning the above mentioned application. A memorandum is provided for the Board's consideration. Comments and recommendations have been provided pursuant to Aboriginal Affairs and Northern Development 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 me by telephone at 867-975-4282 or email at ian.parsons@aadnc-aadnc.gc.ca for further information.

Sincerely,

Ian Parsons
Regional Coordinator
Water Resources Division
Resource Management Directorate
Aboriginal Affairs and Northern Development Canada
IQALUIT, NU X0A 0H0

Encl.

c.c.: Murray Ball, Manager of Water Resources, AANDC Nunavut
Eva Paul, A/Manager of Field Operations, AANDC Nunavut

Memorandum

To: Phyllis Beaulieu, Nunavut Water Board

From: Ian Parsons, Aboriginal Affairs and Northern Development Canada
Courtney Cox, Aboriginal Affairs and Northern Development Canada

CC: Murray Ball (AANDC), Eva Paul (AANDC), and Robin Ikkutisluuk (NWB)

Date: June 13, 2014

Re: Water Licence Renewal Application, #3BM-QIK0712

Licensee: Hamlet of Qikiqtarjuaq
Project: Municipal Water Licence
Region: Qikiqtani

Comments:

A. Background

On May 13, 2014, the Nunavut Water Board (NWB) provided notification of the Hamlet of Qikiqtarjuaq's (the "Licensee") application to renew Water Licence #3BM-QIK0712 to allow for the use of water and deposit of waste for municipal undertakings.

Interested parties were asked to review this application and provide comments by June 13, 2014.

B. Results of review

On behalf of Aboriginal Affairs and Northern Development Canada (AANDC), the following comments and recommendations are provided:

1.	<p>Licence Term</p> <p>Comment: The submitted water licence application form requests a ten year licence. Due to ongoing compliance issues it is recommended that the licence term be shorter and consistent with other municipal water licence terms.</p> <p>Recommendation: It is recommended that the water licence be renewed for five years.</p>
2.	<p>Monitoring Requirements</p> <p>Comment The licensee states in their plan for compliance that all required monitoring under the water license has been carried out, however AANDC finds that the submitted monitoring data in the renewal/amendment application package pertaining to effluent is not only incomplete but lacks</p>

	<p>proper identification of monitoring stations as listed in the licence.</p> <p>Recommendation: The Licensee is required to submit all monitoring data with appropriate station identification to the NWB as a requirement of the Annual Report in Part B Item 1 (i) and Item 2 of the licence. As well Part H of the License pertains to “<i>Conditions applying to the Monitoring Plan</i>” and as a result Part H Items 1, 2, 4, 6 (i-iii), 7, 8 and 18 are all further requirements of the licence.</p>
3.	<p>Water Supply</p> <p>Comment Water being pumped from Tugulak River to the Reservoir is not being metered or measured.</p> <p>Recommendation A metering device should be attached to the river water intake system as a requirement of Part B Item 4 of the licence.</p>
4.	<p>Water Reservoir</p> <p>Comment The licensee states that there is a possible leak in their reservoir and that the reservoir will be inspected this summer (2014), including draining the reservoir.</p> <p>Recommendation: AANDC recommends that the licensee submit to the Nunavut Water Board how they intend to supply water to the community of Qikiqtarjuaq if the reservoir is drained. AANDC would like to point out that as a requirement of Part E Item 1, Item 2 (i-iv) and Item 3 that all modifications to the water supply have to be submitted to the NWB.</p>
5.	<p>Engineering Inspection</p> <p>Comments The Plan for Compliance states that a geotechnical inspection will be carried out by the municipal engineer this summer. The geotechnical assessment report will be provided by March 31, 2015. This is a requirement of Part F, Item 4 of the licence. To date there has been no geotechnical inspection carried out on municipal facilities/infrastructure.</p> <p>Observation AANDC advises that the engineer, ideally, would be from a third party. In the event that the municipal engineer carries out the inspection, they should be a Professional Engineer that is specialized in geotechnical engineering. AANDC will review this engineering assessment report once it is made available for review.</p>
6.	<p>Wetland Area Assessment Report</p> <p>Comment The Plan for Compliance states that the licensee is in compliance with Part D Item 7 of the licence which states that the licensee is required to submit a wetland area assessment report, which is not limited to, Part D Item 7 (i-v).</p>

	<p>Observation This report has not been submitted as of yet. AANDC will review this assessment report once it is made available.</p>
7.	<p>New Sewage Lagoon Effluent Monitoring</p> <p>Comments The Licensee states that they will decant the sewage lagoon once a year and sample the effluent at the end of the wetland area before it enters the ocean for compliance. It is unclear in the Operation and Maintenance Plan what contingencies are in place to stop the effluent from reaching the ocean if the samples are in non-compliance. Furthermore it is also unclear through the Operation and Maintenance Plan whether or not the wetland area will be considered a point of control by the Inspector. Unless the wetland area is engineered and structured in such a way that it is deemed to exact control on the effluent and provide treatment then the last point of control will be deemed the exit for the lagoon and this is where compliance limits should be met.</p> <p>Recommendation AANDC recommends providing evidence that the effluent can be stopped from entering the environment if effluent limits are not met.</p> <p>Also AANDC recommends that the Licensee provide evidence that this is an engineered wetland designed for the purpose of effluent treatment, and not just using the area downstream of the lagoon as an extra means of treatment.</p>
8.	<p>Sewage Sludge Management Plan</p> <p>Comment The Licensee is required to submit a Sludge Management Plan to the Nunavut Water Board for approval as per Part H Item 17 , Part D Item 6 and Part F Item1(ii) of the licence.</p> <p>Observation AANDC will review the Sludge Management Plan once it is made available.</p>
9.	<p>Hazardous Waste Management Plan</p> <p>Comments There is limited segregation of hazardous wastes at the municipal landfill. As per the licensee's submitted plan for compliance, it is stated that they will start segregating the wastes when the Government of Nunavut provides the Hamlet with a guidance document, which is anticipated in June 2014. This is a requirement of Part D, Item 12 of the licence that has yet to be submitted.</p> <p>Observation AANDC will review this management plan once it is made available.</p>
10.	<p>Solid Waste, Water Storage and Sewage Treatment Operation and Management Plans</p> <p>Comment The Licensee has indicated in their plan for compliance that they are in compliance with regards to the above mentioned Operation and Management Plans as required by Part F, Item 1 (i-iii) of</p>

	<p>the licence.</p> <p>Observations</p> <p>These Operation and Maintenance Plans have, in fact, not been approved by the Nunavut Water Board. Furthermore, AANDC submitted a technical memorandum to the NWB on March 28, 2011 outlining a number of concerns and issues with the Operation and Maintenance Plans for the above facilities that were never addressed. AANDC recommends that the past concerns outlined in the March 28, 2011 letter submitted to the Nunavut Water Board be addressed.</p>
11.	<p>Environmental Emergency and Spill Contingency Plans</p> <p>Comment</p> <p>The Licensee states in their plan for compliance that they are <i>"In Compliance"</i> with Part F Items 6, 8 and 10 (i-iii) of the licence. However, these plans have yet to be approved by the Nunavut Water Board. Furthermore, these plans are embedded in the Operation and Maintenance Plans (noted above in Item 10), which were never approved.</p> <p>Observation</p> <p>AANDC will review these two plans once they are made available.</p>
12.	<p>Quality Assurance/Quality Control Plan</p> <p>Comment</p> <p>The Licensee states in their plan for compliance that they are <i>"In Compliance"</i> with Part H Item 12 of the licence. However this plan has yet to be approved by the Nunavut Water Board. Furthermore, this plan is also embedded in the Operation and Maintenance Plans (noted above in Item 10), which were never approved.</p> <p>Observation</p> <p>AANDC will review this plan once it is made available.</p>
13.	<p>Proposed Landfarm</p> <p>Comment</p> <p>The Licensee states in their plan for compliance under Part G Item 10 (xi-xii) that the landfarm, they were initially constructing, is on hold for now due to lack of funding.</p> <p>Recommendation</p> <p>AANDC recommends that the Licensee provide an update on the status of the landfarm and of the material that is to be placed in the proposed landfarm.</p>

Prepared by Ian Parsons and Courtney Cox