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Department of Environment

Ministère de l'Environnement

April 20, 2009

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board

via Email to: licensing@nunavutwaterboard.org

RE: NWB FILE # 3BM-WHA0207 – Hamlet of Whale Cove Renewal Water License Application

Dear Ms. Beaulieu:

The Government of Nunavut, Department of Environment (DOE) has reviewed the renewal water license application from the Hamlet of Whale Cove for water use and waste disposal, and has the following comments and recommendations to make based on the *Environmental Protection Act* regarding spill contingency, sewage treatment O&M and solid waste management.

1. Spill Contingency Plan

Contact Information:

DoE recommends the following contact information be included in the Environmental Emergency Contingency Plan *Appendix A Contact Information*:

- Government of Nunavut, Department of Environment:
 - General inquiries (867) 975-7700
 - Manager Pollution Control (867) 975-7748

Spill Report Form

The NWT-Nunavut spill report form has been updated, and can be obtained from DOE website (<http://www.gov.nu.ca/env/applications.shtml>). This form should be included in the spill plan, and the proponent is required to use this form for reporting to the Spill Line in the case of spills. Additionally, the proponent is advised to enter spill information electronically in the form in the case of spills so the information is legible to regulators inspecting the spill.

2. Sewage Treatment Facility Operation and Maintenance (O&M) Plan

Final Discharge Point

The *Whale Cove Sewage Treatment Facility Operation and Maintenance (O&M) Plan* states that both monitoring station WHA-3 and WHA-6 will be the 'final discharge point' for the Sewage Treatment Facility. The Proponent is asked to clarify which station that is intended to be considered the 'final discharge point' (O&M Plan, pp 12-13).

Sludge Management

Page 9, Section 3.3, of the *Whale Cove Sewage Treatment Facility Operation and Maintenance (O&M) Plan* state the following: "desludging of the lagoon will be conducted, based on the sludge thickness in the lagoon". However, this is not discussed further in the *O&M Plan* for the lagoon provided by the Proponent. Sludge Management should be discussed in the *O&M Plan* including but not limited to the following:

- The expected frequency of desludging (e.g. every 10 years)

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- Treatment and/or disposal methods for the sludge.
- Prior to disposal the sludge has to be tested. However, it is unclear which environmental standard/testing criteria the proponent intends to comply with. This should be included within the Plan.
- Additionally, it is not clear how and when (time of year) sludge removal will occur. For example, where will the community's sewage go when the lagoon is being desludged?

3. Solid Waste Management

Hazardous Waste Storage Area:

An active system of snow removal should be implemented to reduce runoff from and ponding water in the hazardous waste storage area during snow melt.

Open burning

According to the Solid Waste Management Facility O&M Plan open burning of combustible municipal solid waste will form part of the solid waste management in the Hamlet of Whale Cove (pp.5, 7, 9-11). The DOE does not encourage open-burning, but will accept this technique as it is the only viable option in the presence for waste volume reduction and management. Based on the DOE *Municipal Solid Wastes Suitable for Open Burning* policy, we have the following comments and recommendations to make:

- Municipal solid wastes that are conditionally suitable for open burning are paper products, paperboard packing and untreated wood wastes only.
- The principle of source reduction should be utilized to reduce, reuse and recycle materials otherwise bound for landfill.
- Building demolition wastes should not be burned unless they have been sorted to remove non-wood waste such as roofing materials, electrical wire, plastics, asbestos and other non-wood wastes.
- Waste wood treated with preservatives such as creosote, pentachlorophenol or heavy metal solutions shall not be burned. Examples of treated wood materials include railroad ties, telephone/hydro poles, pilings, cribbing and foundations.
- Having applicable permits for burning.

We thank the NWB for the opportunity to provide comments on the Hamlet of Whale Cove's water license application. Please contact us if you have further questions.

Yours sincerely,

Original signed by

Froeydis Reinhart
A/Manager Environmental Assessment and Land Use
Department of Environment
Government of Nunavut

