



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
P.O. Box 100
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Your file - Votre référence
3BM-WHA1520
Our file - Notre référence
CIDM#1292478

January 22, 2021

Robin Ikkutisluk
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: licensing@nwb-oen.ca

**Re: Crown-Indigenous Relations and Northern Affairs Canada Review of the
Licence Renewal Application for the Hamlet of Whale Cove, Type B Water
Licence No. 3BM-WHA1520**

Dear Ms. Ikkutisluk,

Thank you for the December 8, 2020 invitation to review the referenced licence renewal application, for the Hamlet of Whale Cove, submitted by the Government of Nunavut Community and Government Services (GN-CGS), on behalf of the Hamlet of Whale Cove, for Type B Water Licence No. 3BM-WHA1520.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the application pursuant to its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*. Please find CIRNAC comments and recommendations below.

1. Hazardous Waste Leachate

CIRNAC is concerned that leachate from the landfill may contain hazardous waste. Hazardous waste segregation has been identified as a problem by the CIRNAC Inspector in the 2019 Inspection Report and the Inspector directed GN-CGS to submit a hazardous waste segregation plan by February, 2020. This plan was not included in the application. Leachate that contains hazardous waste could be toxic to the water and environment surrounding the landfill.

The 2019 Inspection Report also noted that the containment berm surrounding the leachate pond allows leachate to enter the environment with little to no retention time or treatment. Segregation of hazardous wastes and increasing the retention time to treat the leachate could improve leachate quality before it goes into the environment.



Recommendation:

(R-01) CIRNAC recommends that GN-CGS submit the solid waste segregation plan for review and clarify how the production of hazardous waste runoff, or leachate, will be prevented and managed.

2. Outstanding Compliance Issues

The current licence requires GN-CGS to submit a Solid Waste Disposal Facilities Update Report and an updated consolidated Operations and Maintenance (O&M) Manual, under conditions F1 and F2, respectively. The current licence also requires GN-CGS to commission an inspection of all engineered facilities related to the management of water and waste by a Geotechnical Engineer in accordance with the Canadian Dam Safety Guidelines, at least one (1) year prior to the expiry of the licence, during the open Water period (June/July/August), under condition F6.

According to the Plan for Compliance submitted by GN-CGS as part of the renewal application, these items have not been submitted, or conducted, to date. Given the hazardous waste segregation concerns at the landfill facility, all plan updates should incorporate any new or adaptive management strategies implemented since the issue of the licence in 2015.

Recommendation:

(R-02) CIRNAC recommends that GN-CGS provide the development and submission of a Solid Waste Disposal Facilities Update Report and an updated consolidated O&M Manual, including updates in regards to adaptive management strategies currently implemented.

(R-03) CIRNAC recommends that GN-CGS implement geotechnical inspections for all engineered facilities related to the management of water and waste.

If there are any questions or concerns, please contact me at (867) 975-4282 or bridget.campbell@canada.ca.

Sincerely,

Bridget Campbell

Water Resources Coordinator, Nunavut Regional Office