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NUNAVUT WATER BOARD  
NUNAVUT IMALIRIYIN KATIMAYINGI  
OFFICE DES EAUX DU NUNAVUT

**File: 8AC-ALT1929**

October 25, 2022

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**RE: Licence No: 8AC-ALT1929, Type “A”; Department of National Defence; 2021 Annual Report Review**

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Dear Nathan Koutroulides and Andrew Tam:

The Nunavut Water Board (NWB or Board) has completed the technical review of the 2021 Annual Report (Report) for Type “A” Water Licence 8AC-ALT1929 (Licence) issued to the Department of National Defence (DND or Licensee). The Report was received on March 30, 2022 and submitted as a requirement under Part B of the Licence.

On March 30, 2022, the NWB distributed the Report to the Alert distribution list for information. The table below provides a brief summary of issues found outstanding during the Report review period. The table provides deadlines for the Licensee to respond to respective recommendations and concerns. The Board notes that a number of the comments included in the review of the 2020 Annual Report were not addressed by the deadlines set by the Board. However, the Board also notes the difficulties in staffing the Licensee experienced due to the COVID-19 pandemic.

No.	Intervener Recommendation / Concern	Deadline to Respond by and Provide Outstanding Information
Crown-Indigenous Relations and Northern Affairs (CIRNA) – 2020 Annual Report Review		
1	Address the concerns raised by the CIRNA Resource Management Officer in the summer of 2021 and notify the CIRNA Resource Management Officer of any changes that have been made.	December 1, 2022
Environment and Climate Change Canada (ECCC) – 2020 Annual Report Review		
1	Re-evaluate whether the units used to present lead concentration results in the 2020 Annual Report agrees with the units provided in the laboratory reports, and correct the	2022 Annual Report

	2021 Annual Report as necessary.	
2	Measure and record the ambient conditions (including precipitation, wind speed and direction, air temperature, and pH and temperature of receiving waterbody) and any other notable conditions (such as algal growth) at the time of SNP sampling, and using this information to support the interpretation of monitoring data.	Subsequent annual reports
Nunavut Water Board (NWB)		
1	The NWB notes exceedances of Effluent quality limits above the Licence and CCME criteria as reported in Appendices B and C of the Report. The Licensee committed to measuring background levels of these parameters. The Board looks forward to receiving further information on the exceedances.	2022 Annual Report
2	The NWB notes the Licensee's commitment to conduct liners repairs at the ALT 12 Landfarm in the summer of 2021. The Board looks forward to receiving further information on the activities completed.	2022 Annual Report
3	The Licensee stated its intent to "develop long term monitoring program for PHC contamination in key areas". The Board requests the Licensee keeps the Board up-to-date and upholds the requirements in regards to modifying the existing monitoring program in Licence Part I.	As required by the Licence
4	The Board requests that the Licensee keep it informed before employing any waste management measures, such as the "novel bio-containment barriers to threat runoff and subsurface waters" as described in the Report in line with Licence Part B, Item 10 and Part F, Item 1.	As required by the Licence
5	Licence Part J, Item 6 requires the submission of a reclamations options analysis for historical waste deposit sites no longer in use within twelve (12) months of the Minister's approval of the Licence. The Board has no record of receiving the document. Please submit the analysis.	December 1, 2022
6	The maximum water intake in August and December 2021 are reported as 1615 and 980 m <sup>3</sup> /day, respectively, which is above the permitted daily withdrawal of 875 m <sup>3</sup> /day. The Board reminds the Licensee of the requirement to comply with Part D, Item 2 of the Licence.	Subsequent annual reports
7	The Board reminds the Licensee of the requirement set in Schedule B, Item (a) to provide "[t]he daily, monthly and annual quantities in cubic metres of fresh Water withdrawn from the Upper Dumbell Lake at Monitoring Program Station No. ALT-1" as opposed to providing average withdrawal rates.	Subsequent annual reports
8	The Report states: "[t]he ALT 12 landfarm was taken temporarily out of commission in 2018 due to a punctured liner during the material transfer. All material was removed. Planed [sic] repairs to the liner are to take place during the summer of 2022." The Board requests a clarification on where the material was removed.	December 1, 2022
9	The Report notes that several waste disposal facilities (Millionaire's Dump, Battery Dump, and Dump #3) do not accept any more waste. The Board requests the Licensee provide more information on further plans for these facilities.	December 1, 2022

Copies of all documents received during Report review can be accessed through the NWB's Public Registry and FTP site using the following link:

<ftp://ftp.nwb-oen.ca/registry/8%20MISCELLANEOUS/8A/8AC%20-%20Camp/8AC-ALT1929%20New%20DND/3%20TECH/B%20GENERAL/2%20ANNUAL%20RPT/2021/>

If you have any questions, please contact the undersigned at [assol.kubeisinova@nwb-oen.ca](mailto:assol.kubeisinova@nwb-oen.ca) or (867) 360 6338 (ext. 31).

Best regards,



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Nunavut Water Board  
Technical Advisor

Cc: Distribution List – Alert