



Water Resources Division
Nunavut Regional Office
Iqaluit, NU X0A 0H0

Our File/CIDM's #: 351340

September 8, 2009

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

Re: Type "B" Water Licence Renewals, Department of National Defence (DND): 3BC-BAF0409 – Brevoort Island Project (BAF-3), 3BC-FOD0409 – Dewar Lakes Project (FOX-3), 3BC-SHE0409 – Shepherd Bay Project (CAM-3), 3BC-DYE0409 – Cape Dyer Project (DYE-M), 3BC-CAM0409 – Cambridge Bay Project (CAM-M), 3BC-FOH0409 – Hall Beach Project (FOX-H)

Please be advised that Indian and Northern Affairs Canada (INAC) has completed a review of six (6) Type "B" Water Licence Renewal applications for the Department of National Defence (DND), including Water Licence #3BC-BAF0409 - Brevoort Island Project (BAF-3); #3BC-FOD0409 - Dewar Lakes Project (FOX-3); #3BC-SHE0409 - Shepherd Bay Project (CAM-3); #3BC-DYE0409 - Cape Dyer Project (DYE-M); #3BC-CAM0409 - Cambridge Bay Project (CAM-M); #3BC-FOH0409 - Hall Beach Project (FOX-H).

All associated documents related to this licence posted on the NWB ftp site under 3BC-BAF, 3BC-FOD, 3BC-SHE, 3BC-DYE, 3BC-CAM and 3BC-FOH were included in my review (see attached Technical Review Memo).

Should you have any questions or comments, please do not hesitate to contact me at (867) 975-4738 or by email at Andrea.Cull@ainc-ianc.gc.ca

Yours truly,

Original Signed By

Andrea Cull
Water Management Specialist

Cc: Kevin Buck – Manager of Water Resources, INAC
Peter Kusugak – Manager of Field Operations, INAC
Andrew Keim – Water Resources Officer, INAC



Technical Review Memo

To: Richard Dwyer – Licensing Administrator, Nunavut Water Board

From: Andrea Cull – Water Management Specialist, Indian & Northern Affairs Canada

Re: Type “B” Water Licence Renewals, Department of National Defence (DND): 3BC-BAF0409 – Brevoort Island Project (BAF-3), 3BC-FOD0409 – Dewar Lakes Project (FOX-3), 3BC-SHE0409 – Shepherd Bay Project (CAM-3), 3BC-DYE0409 – Cape Dyer Project (DYE-M), 3BC-CAM0409 – Cambridge Bay Project (CAM-M), 3BC-FOH0409 – Hall Beach Project (FOX-H)

Water licence #'s 3BC-BAF0409, 3BC-FOD0409, 3BC-SHE0409 and 3BC-DYE0409 were all due to expire Feb 28, 2009. DND submitted four amendment applications to the NWB on Feb 11, 2009 requesting that the water licenses be extended for a period of six months to allow work to continue on site and provide such time that Nasittuq Corporation (contracted site operator) could be issued new water licenses by the Board. At that time, DND intended to apply to cancel their licenses. As a result of reconsideration DND has opted to renew these licenses in their name and not the contracted site operator's Nasittuq.

With respect to the existing water licenses #3BC-CAM0409 (CAM-M site) and 3BC-FOH0409 (FOX-H site) set to expire on June 30, 2009, Nasittuq has applied for a new licence as operator of the site (contracted by DND). Similar to the above renewals DND has chosen to re-apply for the renewal of these licenses at this time.

All of the above mentioned water licence renewal applications were submitted by DND and were received by the Board on July 30, 2009.

As a result of this review INAC recommends that the Board impose all of the comments/recommendations that were submitted by INAC between the dates of Feb 24 and March 4, 2009 in regard to the above mentioned projects (please see these 6 attached letters – in response to Nasittuq Corporation's applications to renew).

INAC also recommends that the NWB impose applicable standard conditions from the existing water licence #'s 3BC-BAF0409, 3BC-FOD0409, 3BC-SHE0409, 3BC-DYE0409, 3BC-CAM0409 and 3BC-FOH0409 on any renewed water licenses. In addition the following additional comments/recommendations are provided for your consideration in the licence approval process.

Recommendations/Comments:

Re: Water licence #3BC-BAF0409, 3BC-FOD0409, 3BC-SHE0409 and 3BC-DYE0409

Sewage Disposal

In INAC's 2008 inspection report for 3BC-BAF0409 it was noted that this site does not have a sewage lagoon or any other sewage waste treatment on site. INAC could not perform an inspection in 2009.



As written in the 2008 inspection report for 3BC-BAF0409: Contrary to issued license, Human wastes are macerated and discharged directly to environment via discharge pipe. No Lagoon or sump is present on site.

During 2009 site inspections of 3BC-FOD0409, 3BC-SHE0409 and 3BC-DYE0409 by an INAC Water Resources Officer, it was noted that these sites also do not have sewage lagoons or any sewage waste treatment on site.

As written in the 2009 inspection reports: Human wastes are not treated; rather they are discharged directly to the environment via an outfall pipe contrary to the existing licence. Previously the Inspector required that the Licensee comply with the terms of the existing licence. This issue is to be addressed prior to the period of the next inspection or enforcement actions will be undertaken under the Act.

Parts D, Item 5, of the existing water licenses (3BC-BAF0409, 3BC-FOD0409, 3BC-SHE0409 and 3BC-DYE0409) require that the Licensee shall manage all sewage through the use of Incinolet toilets, and dispose of all resulting ash in the approved on-site landfill facility. The disposal of sewage waste directly to the environment, as noted by the Inspector, appears to be a violation of Section 12 of the Nunavut Waters and Nunavut Surface Rights Tribunal Act (NWNSRTA), in that waste is being deposited in a manner contrary to Board approval. INAC feels that it is unacceptable to dispose of sewage waste without prior approved treatment.

Therefore INAC suggests that the Board impose an additional condition to any renewed license in these cases which would require a Compliance Plan with firm dates of implementation. The Plan at a minimum should include the installation of an appropriate sewage treatment system for both greywater and blackwater, an estimate of the amount of total wastewater generated at the site, restoration/clean-up of areas where raw sewage has been deposited, and an acceptable interim treatment system (portable, holding tanks, etc). The Plan should be submitted 30 days after renewal.