



July 26, 2019

Jaida Ohokannoak  
Technical Advisor II  
Nunavut Impact Review Board

NIRB File No. 13UN034

**Reference: Opportunity to address comments received regarding City of Iqaluit's "New Landfill and Waste Transfer Station" project proposal**

Dear Ms. Ohokannoak,

The City of Iqaluit has reviewed the summary of comments received on January 16, 2019 regarding the New Landfill and Waste Transfer Station project proposal and has gathered the necessary information to satisfy the requests. Listed below are the concerns as well as the specific document that has been included to address those concerns.

- 1a. *Lack of a comprehensive geotechnical survey of the proposed landfill site to offer insight into the characteristics of the local groundwater flow regime including completing the drilling of the bore holes as planned;*
- 1b. Please refer to the included geotechnical investigation provided by EXP. At the time of the geotechnical investigation, the ground was frozen and they were unable to determine ground water characteristics; however the designer, Dillon Consulting ltd., will collect baseline groundwater and surface water data in proximity to the proposed landfill footprint.
- 2a. *Need for Climate Change Predictions including the potential impact to permafrost;*
- 2b. Please refer to the included ICIP Climate Change Resilience Assessment.
- 3a. *Insufficient information on the project specifications that detail facility siting (setbacks), design (liner, filtrate management, regular cover), as well as detailed plans for operation and closure;*
- 3b. Please refer to Appendix E – Design and Construction Options for plans showing the 30% design. As well, please refer to Appendix F – Facility O&M Manual and Appendix I – Closure and Decommissioning Plan. Please note that these are draft versions of the plans and they will be finalized as the design advances.
- 4a. *Lack of a Wildlife Deterrence and Response Plan that includes:*
  - *Additional details on the steps the Proponent will take to deter wildlife from interacting with the project;*
  - *Protocols once an animal is observed, including reporting protocols;*
  - *What tools will be available to staff; and*
  - *Education plans for the staff;*
- 4b. Please refer to Appendix F – Facility O&M Manual section 9.4. Please note that this plan is a draft and the operational and training details are still being finalized. Additionally, please see Appendix J – Environmental Management Plan Table 4-2.

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- 5a. *Lack of a Spill Contingency Plan;*
- 5b. Please refer to Appendix J – Environmental Management Plan, section 6.0.
- 6a. *Recommendations for terms and conditions provided with regards to washing, re-fueling, servicing equipment and machinery, and for the storage of fuel and other materials to prevent any harmful substances entering the water;*
- 6b. Please refer to Appendix J – Environmental Management Plan Table 4-2.
- 7a. *Proponent encouraged to use the ECCC planning and technical guidance document to support responsible solid waste management;*
- 7b. The designer will consider these as part of their design. Included on the design team are two experts who have supported the development of national guidance documents for the north including design/operation of engineered wetlands in northern environments (CAN/CSA-W203 Planning, Design, Operation and Maintenance of Wastewater Treatment in Northern Communities using Lagoon and Wetlands), and waste management in Canada's north (Solid Waste Management for Northern and Remote Communities – Planning and Technical Guidance Document, Environment and Climate Change Canada).
- 8a. *Lack of a Landfill Operation and Maintenance Manual that addresses the management of leachate, and sampling and monitoring requirements;*
- 8b. Please refer to Appendix D – Leachate Treatment Options and Appendix F – Facility O&M Manual section 12.0. Please note that while the 30% design shows a lagoon/wetland type arrangement to treat the leachate, the design team is also investigating the use of a mechanical process to manage the leachate as an alternative. Please refer to the included Mechanical Leachate O&M Manual. This system was used previously at the existing landfill in Iqaluit and is currently in storage.
- 9a. *Insufficient details on monitoring stations for sampling and analysis for any deposits that could enter fish bearing waters;*
- 9b. Please refer to Appendix F – Facility and O&M Manual. Please note that while some details are provided about the monitoring, a monitoring program is currently being developed and will be included as part of the 50% design submission.
- 10a. *Lack of Monitoring and Management Plans which should include appropriate management of drainage/runoff including monitoring and contingency measures to ensure that any deposits are non-deleterious to fish-bearing waters;*
- 10b. Please refer to Appendix F – Facility and O&M Manual. Please note that while some details are provided about the monitoring, a monitoring program is currently being developed and will be included as part of the 50% design submission.
- 11a. *Lack of information on the potential effects and any mitigation plans for any Species at Risk that could be encountered and affected by the project;*
- 11b. Please refer to Appendix J – Environmental Management Plan table 4-2 and section 6.0 – Contingency and Emergency Response Plans

12a. *Need for plans to monitor Species at Risk mitigation, including recording locations and dates of observation of Species at Risk, behaviour or actions taken by the animals, and any actions taken to avoid contact or disturbance of the species and its habitat;*

12b. These plans will be developed as the design advances.

13a. *Potential impacts to migratory and non-migratory birds from project activities;*

13b. Please refer to Appendix J – Environmental Management Plan table 4-1, 4-2 and section 6.0 – Contingency and Emergency Response Plans

14a. *Appropriate measures to be taken by the Proponent to ensure compliance with legislation and regulations to protect migratory birds, and their nests and eggs.*

14b. Please refer to Appendix J – Environmental Management Plan. Section 3.0 identifies the applicable legislation

Please do not hesitate to contact the undersigned if you have any questions or comments.

Thank you,

A handwritten signature in blue ink, appearing to read 'MH', is positioned above the printed name of Matthew Hamp.

**Matthew Hamp**

*Director of Public Works & Engineering, City of Iqaluit*

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