

Environmental Protection Operations Directorate
Prairie & Northern Region
5019 52nd Street, 4th Floor
P.O. Box 2310
Yellowknife, NT X1A 2P7

ECCC File: 6200 000 002/005
NWB File: 1BR-BAK ----



November 23, 2022

via email at: licensing@nwb-oen.ca

Robert Hunter
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0

Dear Richard Dwyer:

RE: 1BR-BAK– Hamlet of Baker Lake – Updated Land Farm Plan

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above-mentioned updated Land Farm plan and has provided comments below.

ECCC is providing technical, science-based information and knowledge based on our mandate pursuant to the *Canadian Environmental Protection Act* and the pollution prevention provisions of the *Fisheries Act*. These comments are intended to inform the assessment of this project's potential effects in the receiving environment and on valued ecosystem components. Any comments received from ECCC in this context does not relieve the proponent of its obligations to respect all applicable federal legislation.

The following comments are provided:

1. Management Plans

Reference(s)

- Baker Lake Landfarm Facility Plan (October 2022)
- Spill Contingency Plan for Baker Lake Landfarm Facility (August 2022)
- ECCC letter of comments to NWB re 1BR-BAK The Landfarm at Baker Lake Project (September 16, 2022)

Comment

The document "Baker Lake Landfarm Facility Plan" dated October 2022 appears to be an update of the August 2022 document "Spill Contingency Plan for Baker Lake Landfarm Facility".



Section 1 (Introduction) of the October 2022 document refers to this document as a Spill Contingency Plan and also states:

This plan meets the following plans as follows -

- Contingency Plan for operations,
- Operation and Maintenance Plan,
- Quality Assurance/Quality Control (QA/QC) Plan,
- Closure and Reclamation Plan,
- Abandonment and Restoration Plan,
- Fuel Management Plan,
- Location of All Nearby Water Bodies to Land-farm, (in figure 3)
- Water Remediation / Treatment Plan,
- Waste acceptance criteria,
- Cell 2 Water,
- MSDS, including Diesel, Gasoline, Jet A-1

Section 1.1 of the October 2022 document indicates that the purpose of the plan is spill contingency planning. Various plans listed above are provided as very brief additions at the end of the Spill Contingency Plan.

Typically, facilities do not to merge all management plans in this way. Management plans should be provided in the standard format and should also provide a greater level of detail.

ECCC Recommendation(s)

ECCC recommends that management plans be provided in the standard format and that a greater level of detail be provided. The following plans be provided as separate documents:

- Spill Contingency Plan
- Operation and Maintenance Plan
- Monitoring Plan
- Closure and Reclamation Plan

The remaining plans listed above could be provided separately or as appendices to the Spill Contingency Plan, the Operation and Maintenance Plan, the Monitoring Plan, or the Closure and Reclamation Plan, as appropriate.

ECCC also recommends that the Proponent consult ECCC's previous comments regarding the water licence application (see ECCC's September 16, 2022, letter of comments to NWB re 1BR-BAK The Landfarm at Baker Lake Project) when drafting these plans.

If you need more information, please contact Eva Walker at eva.walker@ec.gc.ca.

Sincerely,

A handwritten signature in black ink, appearing to read 'E Walker', with a long horizontal flourish extending to the right.

Eva Walker
Senior Environmental Assessment Officer

Attachment(s):

cc: Jody Small, Acting Head, Environmental Assessment North (NT and NU)