

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

March 2, 2009

Phyllis Beaulieu Manager of Licensing Nunavut Water Board PO Box 119 Gjoa Haven, NU X0A 1J0

Re: 1BR-BEA – Type 'B' New Water Licence Application – Indian and Northern Affairs Canada – Bear Island Project

Please be advised that Indian and Northern Affairs Canada (INAC) has completed a review of the above referenced Type 'B' water licence application. Indian and Northern Affairs applied for this new water licence November 12, 2008.

The NWB invited representations to be made to the Board, concerning the licence application by March 5, 2009.

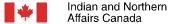
In conducting this review, I have referred to all documents on the Nunavut Water Board FTP site as it relates to 1BR-BEA. Attached is a Technical Review Memorandum for your consideration in the approval of the application.

Please feel free to contact me should you have any questions or comments. I can be reached at (867) 975-4566 or by email at <a href="mailto:trenholmt@inac.gc.ca">trenholmt@inac.gc.ca</a>.

Sincerely,

Original signed by

Tanya Trenholm
Pollution Policy Specialist



Our File #: 9545-1 Doc. CIDMS #:312680

### **Technical Review Memorandum**

To: Phyllis Beaulieu, Manager of Licensing - Nunavut Water Board

From: Tanya Trenholm, Pollution Policy Specialist - Indian and Northern Affairs Canada – Water Resources Division

Re: Indian and Northern Affairs Canada – Bear Island Project – New Water Licence Application

# **Background Information:**

The application stated that the information listed below will be provided to the NWB by the Contractor, following award of the Contract and prior to mobilization:

- 1. Contractor Work Methodology Plan, including
  - a. Camp operation, including wastewater treatment unit specifications
  - b. Details, including incinerator specifications and contaminated water treatment unit specifications;
  - c. Project drawings, including final location of camp, staging area, containerization area and any potential sumps; and
  - d. A detailed work schedule
- 2. Environmental Protection Plan
- 3. Spill Contingency Plan, including
  - a. Site specific spill response plans
  - b. Spill kit quantities and locations;
  - c. Training:
  - d. Key contacts
- 4. Emergency Response Plan, including
  - a. Site specific response plans
  - b. Roles and responsibilities
  - c. Training
  - d. Key contacts

#### **Recommendations / Comments**

## 1. Submission of Outstanding Plans

The NWB should ensure that applicable terms and conditions similar to existing approved water licences for this type of remediation project are imposed (i.e. water licence 1BR-SAR0607 issued to INAC on July 14, 2006). In addition, prior to the commencement of any activities related to the project, the applicant should submit the following plans to the NWB for approval;

- Operation and Maintenance of the proposed lagoon and landfill
- As-built plans and drawings stamped by a qualified engineer for the lagoon and landfill
- Spill Contingency Plan



#### Abandonment and Restoration Plan

Furthermore, the applicant should inform the NWB of the location of the water source once it is identified. Incineration specifications and a Monitoring Program should also be provided to the NWB prior to the commencement of any project related activities.

The application states that the permafrost on Bear Island is sporadic discontinuous. The applicant should verify this using an accepted methodology. All plans for construction related to remediation activities should consider climate change, for example, with respect to cover materials, etc.

Please feel free to contact me at your convenience should you wish to further discuss any part of this submission to the Board. I can be reached at 867-975-4566 or via email, tanya.trenholm@inac.gc.ca.

Sincerely,

Tanya Trenholm

Pollution Policy Specialist Indian and Northern Affairs Canada Nunavut Regional Office – Water Resources Division

Cc. Kevin Buck, Manager, Water Resources Division – Indian and Northern Affairs Canada;