

P.O. Box 119 GJOA HAVEN, NU X0B 1J0 TEL: (867) 360-6338 FAX: (867) 360-6369 File No.: 1BR-BEA1015/TR/E1

September 27, 2010

Natalie Plato Director, Contaminated Sites Indian and Northern Affairs Canada P.O. Box 2200 Iqaluit, NU XOA 0H0

Email: Natalie.plato@inac-ainc.gc.ca

RE: <u>Licence No. 1BR –BEA1015, Type "B" Review of Operation and Maintenance Plan – Bear</u> Island Remediation Project

Dear Ms. Plato:

The Nunavut Water Board ("NWB") received June 15, 2010, the Plan entitled "REMEDIATION OF BEAR ISLAND, NUNAVUT, OPERATIONS AND MAINTENANCE PLAN FOR THE SEWAGE DISPOSAL FACILITIES" dated June 2010. On August 17, 2010 the NWB acknowledged receipt and distribute the Plan to interested parties for a thirty-day review Period. Comments were received from Indian and Northern Affairs Canada (INAC).

A review of the Plan and submissions, has determined that the document is deficient and will require revision before Board approval could be granted. The revised plan should be submitted within thirty (30) days from the date on this letter and should address the following items:

- a. Include procedure to address abnormal operating conditions, such as short-circuiting within the lagoons, and measures to address or remove excessive sludge accumulation;
- b. NWB suggest that Licensee use an alternative procedure, rather than the application of Calcium Hypocrite to the lagoons, to reduce excessive BOD and fecal coliform; increasing the detention time or operating the lagoons in a parallel configuration instead of series might be good alternatives;
- c. Include the contact numbers for EC, GN-DOE, DFO, NWB, QIA, the Project Manager (24-hr contact number) and INAC's Manager of Field Operations;
- d. Provide information on the yearly operating period as well as temporary shutdown or winterization procedures;
- e. provide specifics, in the abandonment and restoration section of the plan, the with respect to follow-up monitoring activities designed to confirm the integrity of the of abandoned lagoons;
- f. Include a list of all hazardous substances affiliate with the sewage disposal facility. Please note that Calcium Hypochlorite was mentioned in the O&M Plan but not listed on hazardous and non-hazardous substances inventory in the Spill Contingency Plan;
- g. Include measures implemented to secure the site, fencing, signage, etc.; and
- h. Address comments from INAC.

Should you have any questions, please feel free to contact the undersigned at 867-360-6338 ext. 25 or by email at sjoseph@nunavutwaterboard.org.

Yours truly,

Original Signed By:

Sean Joseph Technical Advisor

Cc: Distribution List – Qikiqtani Region