



Indian and Northern
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Your file - Votre référence
1BR-BRA

Our file - Notre référence
9545-1 / #86503

June 19, 2006

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Via Email

Re: 1BR-BRA - Indian and Northern Affairs Canada - Bray Island Project - Licence Application

On behalf of Indian and Northern Affairs Canada (INAC) I have reviewed the above-mentioned application. The following specialist advice has been provided pursuant to INAC's mandated responsibilities for the enforcement of the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* (NW&NSRT), *Arctic Waters Pollution Prevention Act* (AWPPA), and the *Department of Indian Affairs and Northern Development Act* (DIAND Act).

Indian and Northern Affairs Canada is applying for a licence for water use and waste disposal associated with site remediation and camp operations for its Bray Island Project. A licence is needed to support the domestic needs of project personnel who will conduct an Environmental Site Investigation of the abandoned FOX-A (Bray Island) DEW Line site between August 1 and September 15, 2006. A temporary camp will be established within the project area capable of accommodating 10 people. The proponent requests the daily use of 150 L of water per individual from Freshwater Lake and a licence from August 1, 2006 to August 1, 2007.

The abandoned FOX-A DEW Line Site is situated on Bray Island in the northeast portion of Foxe Basin. It has a coordinate of 69°13'N, 77°14'W and is situated approximately 170 km east of Igloolik and 175 km northwest of Hall Beach. The proponent's Environmental Site Investigation comprises of four main activities. Namely, a detailed site investigation, a geotechnical investigation, an archeological survey, and the development of detailed remediation plan. In addition to nonhazardous wastes, soils and infrastructure contaminated with heavy metals, PCBs, and petroleum hydrocarbons have been identified in the project area. Based on the results of this site assessment and community consultations with the residents of Igloolik and Hall Beach, the proponent will develop a FOX-A Remedial Action Plan. This Plan should be implemented in 2008 when actual clean up activities are scheduled to commence.

INAC Comments

INAC recommends that the following comments be taken into consideration when reviewing this project submission.

SPILL CONTINGENCY / HAZARDOUS MATERIALS

- INAC recommends that the fuel-cache have a secondary containment facility capable of accommodating at least 110% of the total volume of stored fuel.
- INAC recommends that the Project's Spill Contingency Plan be revised to include a detailed map which identifies the fuel cache location and spill response equipment. Furthermore, this Plan should indicate the spill response equipment available on site and contact information of the On-site Project Manager as well as any other key personnel, i.e., provide satellite phone numbers. This ensures a 24-hour point of contact for the authority investigating any spills.

Indian and Northern Affairs Canada requests notification of any changes in the proposed project, as further review may be necessary. Please do not hesitate to contact me if you have any questions or comments with regards to the foregoing by telephone (867) 975-4555 or by email via abernethyd@inac-ainc.gc.ca.

Sincerely,

Original signed

David W. Abernethy
Water Resources Coordinator

cc. Jim Rogers - Manager of Water Resources, Indian and Northern Affairs Canada, Iqaluit