# DEPARTMENT OF NATIONAL DEFENCE SPECIFICATIONS FOR THE CLEAN UP OF THE CAM-M - CAMBRIDGE BAY DEW LINE SITE

# **ENVIRONMENTAL PROTECTION PLAN**



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#### TABLE OF CONTENTS

1.0	INTRO	ODUCTION
	1.1	SCOPE AND OBJECTIVES
2.0	PROII	ECT DESCRIPTION OVERVIEW
0	2.1	PROJECT RATIONALE
	2.2	PROJECT ACTIVITIES
		Construction Camps
		Excavation of Contaminated Soil
		Disposal of Hazardous Materials
		Construction of Tier II Disposal Area
		Disposal of Non-Hazardous Materials
		Demolition of Existing Facilities
		Collection and Disposal of Site Debris
		Landfill Closure 2 - 7
		Development of Granular Borrow Areas
		Site Grading
		Demobilization
3.0		LATORY OVERVIEW
	3.1	INTRODUCTION
	3.2	FEDERAL ACTS, REGULATIONS AND GUIDELINES
	3.3	NORTHWEST TERRITORIES ACTS, REGULATIONS AND GUIDELINES
	3.4	NUNAVUT 3 - 5
	3.5	OTHER 3 - 5
	3.6	PERMITS 3 - 5
4.0	CENE	RAL ENVIRONMENTAL PROTECTION MEASURES
7.0	4.1	GENERAL 4-1
	4.2	CONSTRUCTION CAMP
	4	Siting
		Equipment and Vehicle Use and Maintenance
		Storage and Handling of Fuel and Other Hazardous Substances
		그렇게 그림으로 하시는 그렇게 바다를 다면서 되었다면 되었다면 되었다면 되었다면 되었다면 되었다면 되었다면 되었다면
		Water Management
	4.2	Domestic Waste Management
	4.3	ROAD CONSTRUCTION AND MAINTENANCE
	4.4	STREAM CROSSING AND DIVERSION
	4.5	BORROW PIT AND QUARRY DEVELOPMENT AND OPERATION 4 - 5
	4.6	HAZARDOUS MATERIAL PROCESSING AREAS
	4.7	CONTAMINATED SOILS
	4.8	LANDFILL CLOSURE AND DEVELOPMENT 4 - 7
	4.9	DISPOSAL OF SITE DEBRIS
	4.10	DEMOLITION OF BUILDINGS AND STRUCTURES
	4.11	MARINE VESSEL MOVEMENTS
	4.12	AIRCRAFT MOVEMENTS 4 - 8
	4.13	TRANSPORTATION OF HAZARDOUS MATERIALS 4 - 8
	4.14	EXPLOSIVES
	4.15	WORK SITE CLEAN UP AND ABANDONMENT 4 - 10

5.0	PROT	ECTION MEASURES FOR VALUED ENVIRONMENTAL COMPONENTS
	5.1	GENERAL
	5.2	HUMAN HEALTH AND SAFETY
	5.3	LOCAL RESOURCE USE
	5.4	LOCAL ECONOMY AND CONTACT WITH LOCAL RESIDENTS 5 - 2
	5.5	AESTHETIC VALUE 5-3
	5.6	SURFACE WATER AND FISH HABITAT 5 - 3
	5.7	PERMAFROST SOILS
	5.8	COASTAL MARINE RESOURCES 5 - 5
	5.9	TERRESTRIAL RESOURCES
	5.10	HERITAGE RESOURCES
6.0	ENVI	RONMENTAL INSPECTION
	6.1	GENERAL
7.0	CONT	INGENCY PLANS 7-1
	7.1	GENERAL
	7.3	FUEL AND HAZARDOUS MATERIAL SPILLS 7-1
	7.3	WILDLIFE ENCOUNTER
	7.4	HERITAGE RESOURCES
	7.5	KEY CONTACT LIST

# LIST OF TABLES

2.1	DEW LINE CLEAN UP CRITERIA (DCC) FOR CONTAMINATED SOIL	2 - 4
2.2	HAZARDOUS MATERIAL DISPOSAL REQUIREMENTS	2 - 5
3.1	LIST OF AUTHORIZATIONS FOR CLEAN UP ACTIVITIES	3 - 6
5.1	APPROXIMATE NESTING AND BREEDING CHRONOLOGY FOR BIRDS OBSERVED NEAR THE CAM-M SITE	5 - 7
7.1	CONTACTS FOR RESOURCE INTERESTS	7 - 8

# LIST OF ACRONYMS

CCME Canadian Council of Ministers of Environment

CEPA Canadian Environmental Protection Act

DCC DEW Line Clean Up Criteria
DCL Defence Construction (1951) Ltd.
DEW Line Distant Early Warning Line

DIAND Department of Indian Affairs and Northern Development

DND Department of National Defence ("Owner")
EARP Environmental Assessment and Review Process

EPP Environmental Protection Plan

GNWT Government of Northwest Territories
IATA International Air Transport Association
IMDGC International Marine Dangerous Goods Code

LRR Long Range Radar

LSS Logistic Support Site or Station
MOU Memorandum of Understanding
MSDS Material Safety Data Sheets

NFC National Fire Code

NTI Nunavut Tunngavik Incorporated

NWS North Warning System
NWT Northwest Territories
PCB Polychlorinated biphenyl
PMO Project Management Office
POL Petroleum, Oils and Lubricants

SRR Short Range Radar
SUR Site Use Restrictions

TDGA Transportation of Dangerous Goods Act

TFN Tungavik Federation of Nunavut

WHMIS Workplace Hazardous Materials Information System

R95-40 - 1 -

# 1.0 INTRODUCTION

#### 1.1 SCOPE AND OBJECTIVES

- This Environmental Protection Plan (EPP) has been prepared to detail mitigative measures for potential environmental impacts associated with the construction and clean up activities at the CAM-M, Cambridge Bay site as identified during the Environmental Screening Process. Environmental Screenings are a formal part of the Federal Environmental Assessment and Review Process (EARP). These screenings and all available environmental and engineering information were used to prepare the EPP. Although the Canadian Environmental Assessment Act is now in effect, this project was initiated under EARP and is subject to the requirements of the process.
- The EPP is to be implemented by the Contractor through appropriate actions and the application of contingency plans. The EPP is designed to be used during clean up activities in conjunction with the Contract Drawings and Specifications. It forms part of the Contract Documents and reference to it can be found throughout the Contract Specifications.

#### .3 The EPP provides:

- .1 an overview of the activities involved in construction of a work camp, clean up and demolition activities, and closure of those portions of the DEW Line site not required as part of the North Warning System (NWS) (Section 2.0);
- .2 an overview of the regulatory environment which includes legislation and regulations from federal and territorial authorities. It also describes the requirements of other regional agencies. (Section 3.0);
- .3 a description of the general environmental protection measures required to minimize or avoid potential adverse effects (Section 4.0);
- a description of protection measures required for specific valued environmental components at the CAM-M, Cambridge Bay site (Section 5.0);
- details related to environmental inspection responsibilities and procedures (Section 6.0); and
- .6 contingency plans describing emergency actions and reporting requirements (Section 7.0).
- The protection measures described herein are to be implemented by the Contractor to minimize or avoid potential adverse environmental impacts. These procedures are considered appropriate for known and anticipated situations and conditions. However, should certain procedures or protection measures prove impractical, imprudent or insufficient in field situations, appropriate modifications or substitutions are to be proposed by field personnel, reviewed and approved by the Engineer in consultation with regulatory officials.

R95-40 I - 1

# 2.0 PROJECT DESCRIPTION OVERVIEW

## 2.1 PROJECT RATIONALE

- In March 1985, Canada and the United States signed a Memorandum of Understanding (MOU) agreeing to modernize the North American Air Defence System. The memorandum sets out the requirements for replacement of the Distant Early Warning (DEW) Line with an upgraded system called the North Warning System (NWS).
- Of the original 42 DEW Line sites, 21 sites were closed in 1963 and are currently under the administration of the Department of Indian Affairs and Northern Development (DIAND). Of the remaining 21 DEW Line sites in the Canadian Arctic, eight were converted to NWS Long Range Radar (LRR) sites, eight to NWS Short Range Radar (SRR) sites, and the remaining five were decommissioned completely. CAM-M, Cambridge Bay is a LRR/LSS site and will continue to be occupied.
- Environmental investigations of the DEW Line sites were carried out to identify the principal contaminants and determine the impact of these substances on the Arctic ecosystem. In addition, an evaluation of past waste disposal practices, specifically landfill locations, contamination sources and potential for contaminant migration, were conducted at each site. Based on the information obtained during the environmental studies, the DEW Line Clean Up Protocol was developed and provided a consistent approach to the clean up of the sites.
- Following the environmental investigations, engineering site assessments were conducted to obtain the information required to develop clean up drawings and specifications, and included surveys of contaminated areas, characterization of debris and landfill areas, investigation of proposed landfill development areas and identification of granular borrow sources.
- The environmental and engineering surveys at the CAM-M site were carried out over the period of 1989 to 1994 and documented the environmental implications and potential effects of the clean up work. An environmental and engineering site investigation was carried out in 1996 with the objectives of more accurately delineating known contaminated areas, characterizing stained areas, and verifying overall site conditions. The need for mitigation, monitoring and/or actual project activity modifications was also identified.

- .6 Specific to the CAM-M, Cambridge Bay site, the primary clean up requirements are as follows:
  - demolition and disposal of infrastructure no longer required for the operation of the NWS LRR/LSS site:
  - excavation and disposal of contaminated soils:
  - · closure of four existing landfills; and
  - cleanup of one dump site/landfill area.

#### 2.2 PROJECT ACTIVITIES

- The clean up activities are based on the DEW Line Clean Up Protocol which targets contaminated soil, landfills, and demolition and exposed debris for cleanup. The following sections outline the major activities to be performed in the clean up of the CAM-M site. Detailed requirements are described in the Contract Specifications and Drawings. It is intended that the EPP be read in conjunction with these documents to determine all project requirements.
- The major clean up activities include the following:
  - mobilization;
  - establishment of a construction camp, including:
    - access and supply routes,
    - water supply,
    - waste management,
    - fuel handling and storage,
    - equipment and vehicle use, storage and maintenance;
  - excavation of contaminated soil;
  - collection and disposal of site debris;
  - disposal of hazardous material;
  - disposal of non-hazardous materials;
  - construction of a Tier II soil disposal area;
  - demolition of existing facilities;
  - closure of existing landfills;
  - development of granular borrow areas:
  - site grading; and
  - demobilization.

#### .3 Construction Camps

#### .1 Siting

.1 Two alternatives are available for camp accommodations at CAM-M: commercial facilities in the Hamlet of Cambridge Bay, or establishment of a separate construction camp on the site.

- .2 The construction camp shall meet all requirements of Section 01591 of the Contract Specifications.
- .3 Locate the construction camp and/or associated storage areas in areas of previous disturbance, or as proposed on the Contract Drawings, to minimize damage to previously undisturbed areas.

#### .2 Access

- .1 Access to the CAM-M site is provided by regularly scheduled aircraft. charter aircraft and barge.
- .2 Local access to construction, demolition, clean up and other work areas is generally via existing road networks. Graded areas, located near the beach landing area, and/or in the vicinity of the Station Area, are to be used for temporary storage of materials.
- .3 Do NOT interfere with NWS operations at the site.

#### .3 Water Supply

The existing water supply lake at the CAM-M site may be used as a potable water source, providing that the cumulative water withdrawal rate by NWS and the Contractor does not adversely affect fish habitat. An alternative water supply is to be located, tested and approved in accordance with the Water Use License. The Contractor shall routinely monitor water quality to ensure that it meets or exceeds the Guidelines for Canadian Drinking Water Quality.

#### .4 Waste Management

- .1 Provide waste management for all facilities operated by the Contractor.
- .2 Only domestic and human waste shall be collected and disposed of in a wastewater treatment system. This excludes items such as waste oil and liquids containing hazardous material. The wastewater shall be disposed of in accordance with the wastewater discharge criteria provided in Section 01560 of the Contract Specifications.
- .3 Non-hazardous solid wastes, generated as part of the operation of the construction camp, are to be disposed of on site in an extension to an existing landfill. Domestic non-hazardous wastes may be incinerated and disposed of, as described above.

#### .5 Fuel Handling and Storage

Transport fuel to the site and store in approved facilities, as described in Section 4, at the construction camp, storage compound or existing fuel storage facilities, if available.

- .6 Equipment and Vehicle Use, Storage and Maintenance
  - .1 Transport equipment and vehicles to the site, store in approved locations, use only for contracted work, and maintain as required.

#### .4 Excavation of Contaminated Soil

- The definition of contaminated soil has been established in accordance with the DEW Line Clean Up Criteria as shown in Table 2.1. Soils contaminated at levels above DCC Tier I but less than DCC Tier II criteria are to be landfilled on site. These criteria are designed to be protective of the Arctic ecosystem.
- .2 Complete all work related to the excavation and disposal of contaminated soils in accordance with Section 02066 of the Contract Specifications.

DEW LINE CLEA	IBLE 2,1 N UP CRITERIA (DCC) AMINATED SOIL	
	Criter	ria
Substance	DCC Tier I (ppm)	DCC Tier II (ppm)
Arsenic (As)		30
Cadmium (Cd)		5
Chromium (Cr)		250
Cobalt (Co)		50
Copper (Cu)		. 100
Lead (Pb)	200	500
Mercury (Hg)		2
Nickel (Ni)		100
Zinc (Zn)		500
Polychlorinated Biphenyls (PCBs)	1	5

## .5 Disposal of Hazardous Materials

.1 "Hazardous" materials are defined as follows:

Hazardous materials are wastes or materials that are designated as "hazardous" under Northwest Territorial, or Federal legislation; or as "dangerous goods" under the *Transportation of Dangerous Goods Act* (TDGA). The *Canadian Environmental Protection Act* (CEPA) also regulates material containing PCBs at greater than fifty parts per million (ppm). Specifically identified hazardous materials include: batteries:

asbestos; fuel tank bottom sludges; solvents; PCB-containing liquids; fuels and lubricating oils; alcohols and glycols; and heavy metal-contaminated liquids. Disposal requirements for these hazardous materials are outlined in Table 2.2.

9.1	TABLE 2.2 HAZARDOUS MATERIAL DISPOSA	L REQUIREMENTS
	Hazardous Material	Disposal Requirement
	heavy metal-contaminated organic liquids liquids containing organic compounds with chlorine concentrations > 1000 ppm liquids containing organic compounds with PCB concentrations > 2 ppm and < 50 ppm liquids containing organic compounds other than those described above	licensed treatment/disposal facility
•	ashestos	double bag and dispose of in on-site engineered landfill
	fuel rank bottom sludges fuels, lubricating oils, alcohols and glycols	licensed treatment/disposal facility or on- site incineration
•	liquids and solids containing organic compounds with PCB concentration > 50 ppm	licensed storage, or disposal at the Alberta Special Waste Management System Facility - Swan Hills, Alberta

- .2 Hazardous materials may be encountered during sorting of site and demolition debris. Collect and sort hazardous materials using equipment suitable for the task.
- .3 If a substance is discovered that is suspected to be explosive, immediately eliminate all ignition sources in the area (including smoking, flares or flames in the immediate area). Clean up the material and dispose of only under the supervision of a permitted explosives expert. If fire or heat threatens the area of the potentially explosive material, all personnel will move to a distance of at least 1000 m from the material. Implement the procedure outlined in the Contractor's Contingency Plan for dealing with such substances.
- .4 Test any suspected radioactive material and handle, package and dispose all confirmed radioactive materials as outlined under the TDGA and the Atomic Energy Control Act.
- .5 Transport hazardous materials in accordance with the <u>Transportation of Dangerous Goods Regulations</u>, as applicable.
- .6 Conduct all work related to hazardous materials in accordance with Section 02090 of the Contract Specifications.

.3 Areas not to be disturbed include the operating LRR facilities including satellite ground terminals and fuel storage tanks, as described in the Contract Specifications and Drawings.

## .13 Demobilization

.1 Following the completion of clean up activities, remove all equipment, remaining fuel, supplies, and the construction camp from the site.

# 3.0 REGULATORY OVERVIEW

#### 3.1 INTRODUCTION

The Contractor shall comply with all applicable environmental laws, regulations and requirements of Federal, Territorial, and other regional authorities, and will acquire and comply with such permits, approvals and authorizations as may be required. The Contractor is subject to and must comply with those permits and approvals obtained on behalf of and by DND to conduct this work. The Contractor, through all project phases, shall work in close cooperation with regulatory authorities and DND to ensure compliance.

#### 3.2 FEDERAL ACTS, REGULATIONS AND GUIDELINES

- .1 Several federal Acts, regulations, and guidelines affect project activities across all Canadian jurisdictions. The most relevant to the DEW Line Clean Up EPP are outlined below:
  - .1 The Canadian Environmental Protection Act (CEPA) is a comprehensive piece of environmental legislation that regulates toxic substances from their production or import, to consumption, storage and disposal. This Act also incorporates the former Ocean Dumping Regulations and PCB Storage Regulations.
  - .2 The Transportation of Dangerous Goods Act and Regulations promote public safety in the transportation of dangerous goods. The Act applies to all handling, offering for transport and transporting of dangerous goods by any means of transport whether or not the goods originate from or are destined for any place or places in Canada.
  - .3 The Fisheries Act protects fish and fish habitat from pollution, negative alteration or disturbance, or impediments to fish movement. Fisheries and Oceans Canada will be given the opportunity to review permit applications or restoration plans submitted by other agencies.
  - .4 The Arctic Waters Pollution Prevention Act and Regulations govern development and shipping activity in Arctic waters adjacent to the mainland and islands of the Canadian Arctic, to ensure the continuing welfare of the residents of the areas, and to protect the ecological balance in water, ice and land areas.
  - .5 The Migratory Birds Convention Act provides for the protection of designated migratory species, including birds of prey, their habitats, and the regulated harvest of certain species.

- .6 The Canada Wildlife Act provides for the involvement of the Government of Canada in cooperative research and management programs involving wildlife species normally the responsibility of provinces or territories. This is particularly relevant to rare and endangered species or species such as caribou which seasonally move across various regulatory boundaries.
- .7 The Canada Shipping Act regulates shipping activities under the jurisdiction of Canada. Regulations cover technical standards of operation safety and pollution aspects related to shipping activities in Canadian waters.
- .8 The Navigable Waters Protection Act pertains to the erection of structures or facilities used to support or impede navigation in waters under the jurisdiction of Canada.
- .9 The Territorial Lands Act provides the authority for administering and protecting lands under the direct control of the Minister of Department of Indian Affairs and Northern Development (DIAND) (Territorial Lands). The following regulations are pursuant to this act:
  - The Territorial Land Use Regulations provide regulatory control for maintaining sound environmental practices for any land use activities on Territorial lands. These regulations require that land use permits be issued for such operations as work involving the use of heavy equipment, establishment of camps, use of explosives, and clearing of lines, trails and rights-of-way, including construction of access roads.
  - The Territorial Quarrying Regulations establish the fee schedule and procedures for extracting Crown-owned limestone, granite. slate, marble, gypsum, loam, marl, gravel, sand, clay or stone from Territorial Lands. The regulations specify permits, applications, staking and dimensions of quarries.
- .10 The Northwest Territories Waters Act and Regulations provide for the conservation, development and use of the water resources of the Northwest Territories and for the establishment of a Water Board to license all such water usage and waste disposal activities.
- Canada Labour Act and Regulations under the Act is the Labour code for all Federal Employees or activities on Federally owned or controlled land. Private Provincial or Territory employees are governed by the Provincial/Territorial Labour Acts, even when working on Federal lands or facilities. The labour acts control such things as statutory holidays, maximum work hours and minimum wages.
- .12 Atomic Energy Control Act and Regulations describe the packaging requirements and approvals needed for the transportation of radioactive materials.
- .13 Explosives Act and Regulations define explosives, the permitting requirements needed to use explosive substances, packaging, handling and transporting requirements, and safety requirements.
- National Fire Code (NFC) establishes the standard for fire prevention, fire fighting and life safety in buildings in use, including standards for the conduct of activities causing fire hazards, maintenance of fire safety

R95-4() 3 - 2

equipment and egress facilities, standards for fire extinguishers, etc. In addition, the NFC establishes the standard for prevention, containment and fighting of fires originating outside buildings which may present a hazard to a nearby community, and sets the standards for the storage and handling of dangerous goods, flammable liquids and combustible liquids.

- .2 The following guidelines were used as reference in the development of the DEW Line Clean Up Protocol and Contract Specifications. These guidelines are identified as reference materials only.
  - .1 <u>Guidelines for Effluent Quality and Wastewater Treatment at Federal Establishments</u> indicate the degree of treatment and effluent quality that will be applicable to all wastewater discharged from existing and proposed Federal installations.
  - .2 National Guidelines for the Landfilling of Hazardous Waste (CCME Report. April 1991) are to be used by regulators, designers, owners, and operators of hazardous waste facilities. They cover site selection, design, construction, closure and post-closure care, monitoring, and operation. They are intended for new, not existing facilities.
  - .3 Guidelines for Preparation of Hazardous Material Spill Contingency Plans identify factors that should be considered in the development of hazardous material spill contingency plans and the information that should be incorporated into a comprehensive contingency plan.
  - .4 Code of Good Practice on Dump Closing or Conversion to Sanitary Landfill at Federal Establishments (1977) outlines the guidelines to improve operation and properly close existing dumps. It is intended to promote a consistent approach to the clean up of existing dumps to prevent contamination of water, air and land and to ensure that the best particular control technology is used.
  - .5 Code of Practice for Used Oil Management in Canada describes environmentally sound options for the handling, storage, collection, transportation, recycling, reuse and disposal of used oils in Canada. It is intended to provide guidance for used oil generators and to regulatory authorities in the formulation of provincial or regional used oil management strategies.
  - Canadian Environmental Quality Criteria for Contaminated Sites compiled by the Canadian Council of Ministers of the Environment (CCME) provide numerical limits for contaminants in soil and water intended to maintain, improve, or protect environmental quality and human health at contaminated sites. The criteria are intended to provide general technical and scientific guidance to provincial, federal, territorial, and non-governmental agencies in the assessment and remediation of contaminated sites across Canada. They serve as bench marks against which to assess the degree of contamination at a site.

.7 Canadian Drinking Water Guidelines are also compiled by CCME for Canadian Drinking Water Quality for specified uses of water likely of concern at contaminated sites.

# 3.3 NORTHWEST TERRITORIES ACTS, REGULATIONS AND GUIDELINES

The Territorial Government and DIAND jointly administer the part of the NWT which contains the CAM-M DEW Line site. The Territorial seat of government and the DIAND regional office are in Yellowknife. The DIAND district office is located in Iqaluit. In addition to the Federal and Territorial Acts and Regulations identified in Clause 3.2, the clean up of the CAM-M site is governed by the following:

- .1 The Explosive Use Act provides controls for surface blasting other than for mining purposes.
- .2 The NWT Wildlife Act provides for the protection of wildlife and wildlife habitats as well as regulated harvest of selected species.
- .3 The NWT Environmental Protection Act provides for protection of the environment from the discharge of contaminants, clean up of contaminants and unsightly premises. In addition, the powers of inspectors as well as offenses and penalties are defined. The Act applies only to situations not authorized by other Canadian Acts in the NWT. The following guidelines under the NWT Environmental Protection Act may be applicable to the cleanup of the CAM-M site:
  - Guideline for the Management of Waste Antifreeze:
  - Guideline for the Management of Waste Asbestos:
  - Guideline for the Management of Waste Batteries:
  - Guideline for the Management of Waste Solvents:
  - Guidelines for the General Management of Hazardous Waste in the NWT: and
  - Guideline for the Management of Waste Paint.
- .4 The Spill Contingency Planning and Reporting Regulations outline requirements for filing of a contingency plan and for reporting of spills.
- .5 The Northwest Territories Archaeological Sites Regulations, pursuant to the Northwest Territories Act, protects archaeological sites in the Northwest Territories from disturbance and prohibits the removal of archaeological specimens, except under permit.
- .6 Safety Act: Occupational Health Regulations outline the health and safety standards to be maintained at workplaces to ensure the health and safety of persons.
- .7 Guidelines for Removal of Materials Containing Friable Asbestos outline guidelines to be used to remove friable asbestos.

## 3.4 NUNAVUT

- In 1990, leaders of the federal and territorial governments, and the president of the Tungavik Federation of Nunavut (TFN) signed an Agreement-in-Principle establishing Nunavut, a land claim settlement area incorporating almost two million square kilometres of the present NWT. Inuit ratification of the document was achieved in November 1992, and the Land Claim Agreement was signed by the Federal government, GNWT and TFN in May 1993. Nunavut Tunngavik Incorporated (NTI), established on April 1, 1993, is an Inuit corporation in charge of implementing the Nunavut Land Claims Agreement.
- There are no Nunavut specific requirements for work being conducted within the DND DEW Line site reservation. As a partner in the clean up process, there will be, however, representatives from the NTI present on the site. It should be noted that certain activities may result in reporting requirements. These would include reporting any archaeological finds to the Inuit Heritage Trust. The Contractor shall comply with any reporting requirements outlined in the Nunavut Land Claims Agreement.

#### 3.5 OTHER

Transportation and disposal of hazardous wastes is to be conducted by licensed waste handlers, in compliance with the appropriate legislation.

#### 3.6 PERMITS

The Contractor involved in the site clean up process will be required to acquire and pay for all necessary permits, approvals and authorizations associated with the Contractor's site operations, and with the handling, transport and disposal of hazardous material. A partial list of these requirements is presented in Table 3.1.

	LIST OF	TABLE 3.1 APPLICABLE AUTHORIZATIONS FOR CLEAN UP ACTIVITIES	E 3.1 TIONS FOR CLEAN UP A	CTIVITIES	
Authorization	Authority	Activity to Which Authorization Applies	Contact	Minimum Turnaround Time	Responsibility for Permit Application
Land Use Permit	Territorial Land Use Regulations (NWT)	Camps, heavy equipment, explosives, new roads, fuel storage and use, landfill, terrain protection, waste disposal.	Indian and Northern Affairs Canada P.O. Box 1500 Yellowknife, NT X1A 2R3 (867) 920-8165	42 days	OND
Quarrying Permit/ License	Territorial Quarry Regulations (NWT)	Extraction, staking, dimensions,	Indian and Northern Affairs Canada P.O. Box 1500 Yellowknife, NT X1A 2R3 (867) 920-8165	42 days	CINCI
Authorization for Works or Undertakings Affecting Fish Habitat	Fisheries and Oceans Canada (NWT)	Stream crossing, culverts, drainage, siltation and erosion control, effluent discharge,	Government of Canada - Dept. of Fisheries and Oceans (867) 920-6640	l week	Contractor
Transportation Permits	Transportation of Dangerous Goods Act	Shipping.		Advance notification 30 days	Contractor
Transportation Permits	International Air Transport Association Dangerous Goods Regulations	Air transport.		Advance notification 30 days	Contractor

Personal applications only.	6 weeks	Any RCMP detachment	Use and storage of firearms.	RCMP	Firearms Acquisition
Personal applications only			Recreational fishing.	Department of Renewable Resources	Fishing Licenses
CINCI	3 weeks	Prince of Wales Northern Heritage Centre (867) 920-8084	Investigation of archaeological sites, mitigation, monitoring.	Northwest Territories Act, Archaeological Sites Regulations	Archaeological Research Permit
Contractor - for camp operation requirements and clean up activities, as required.	8 weeks	NWT Water Board (867) 920-8191	Water use and waste disposal.	Northwest Territories Water Act	Water Use and Waste Disposal Licenses
	Minimum Turnaround Time	Contact	Activity to Which Authorization Applies	Authority	Authorization
	CHAINES	± 3.1 TIONS FOR CLEAN UP A	TABLE 3.1 LIST OF APPLICABLE AUTHORIZATIONS FOR CLEAN UP AC	40.1.SIT	

<sup>&</sup>lt;sup>1</sup> Only required in the event that heritage resources are discovered during clean up activities.