Richard Dwyer

From: David Hohnstein [dts@nunavutwaterboard.org]
Sent: Friday, April 04, 2008 1:52 AM
To: Craig, Douglas
Cc: eva.schulz@uma.aecom.com; Dionne Filiatrault; Phyllis Beaulieu
Subject: Re: Defence Construction Canada

Hello Douglas,

my apology for not replying sooner to your earlier email. It came prior to my travelling to Iqaluit for a weekend meeting and then the following week (3 days) was hectic with other files prior to my leaving on the 13th for some scheduled leave. Now back (last week), I am finally getting through many emails.

With respect to your question below and the identified files, the reasoning for leaving out the phenol parameter appears to be justifiable and may be addressed through a simple errata for the licences involved. I will have to clarify this with our Licensing (and exec. dir.) to see if that can be done up front, or if a distribution of your request will be required for input from other regulators prior to making the change (as an amendment). As you have indicated, the phenol content will be captured with other methodology and is not necessary to be analysed for on its own, impacting the remediation program and the duration of the work. This item will have to be considered for other clean up projects as well that are currently before the Board for approval.

I thank you for your observations and bringing this item to the attention of the NWB.

I will hopefully be able to answer this question for you by the end of the day (Friday) and determine if the request requires a formal amendment application (I would hope not) or simply deal with by way of errata to the licence for removal of the requirement.

Regards,

David

> ----- Original Message -----
> **From:** Craig, Douglas
> **To:** dts@nunavutwaterboard.org
> **Cc:** eva.schulz@uma.aecom.com
> **Sent:** Monday, March 31, 2008 11:59 AM
> **Subject:** RE: Defence Construction Canada
>
> Hi David,
>
> I was wondering if you've had an opportunity to consider my email (below).
> Thanks.
>
> *Douglas Craig, M.Sc.*
> *Environmental Officer*
> *DEW Line Clean Up*
> *Defence Construction Canada*
> *Constitution Square, Suite 1720, 350 Albert St.,*
> *Ottawa, Ontario*
> *K1A 0K3*

Phone: (613) 998-7288
Fax: (613) 998-0468

From: Craig, Douglas
Sent: Thursday, March 06, 2008 9:43 AM
To: 'dts@nunavutwaterboard.org'
Cc: eva.schulz@uma.aecom.com
Subject: Defence Construction Canada

Good afternoon David,

I was speaking with Phyllis Beaulieu of the NWB in Gjoa Haven last week regarding a technical issue in three recent water use licences, and she referred me to you. I've tried calling a few times, but assume you've been busy on another line or away.

The issue I'd like to discuss relates to the following licences:

#1BR-MAC0712 (CAM-5, Mackar Inlet),
#1BR-JEN0712 (CAM-1, Jenny Lind Island), and
#1BR-BYR0712 (PIN-4, Byron Bay)

These three licences were obtained in 2007, and differed from previous licences in that they provided specific criteria for the discharge of contact water, meaning water that has potentially come into contact with contaminants (excavation water, rinsewater from barrel processing, etc.). During the writing of the recent licences, the NWB requested the criteria that we would be using, which was then incorporated into the licences. All of the parameters and criteria we submitted were then included in the wastewater criteria in the licences, however, an additional parameter - phenol, was also added. The main points for not including phenols, based on some of the data we had collected, were:

1. The main source of phenol at the DEW Line sites is oil and grease.

2. We measure oil and grease in a more direct manner, specifically Total Petroleum Hydrocarbon (TPH). TPH is part of the criteria listed in the licences, and a parameter that was already being used by the DLCU project.

3. When phenols are present at concentrations above 20 ug/L (criteria limit in licences), oil and grease concentrations are above the maximum allowable concentration (MAC) of 5 mg/L, and will usually produce a visible sheen. When the oil/grease concentration in the wastewater is above the MAC, the water must be treated prior to discharge. Typically, when this water is passed through an activated carbon filter, and/or absorbent material was used to remove a visible sheen, a decrease in phenol concentrations to below the MAC of 20 ug/L was also observed.

4. TPH can be measured onsite, but phenol cannot. Phenol analysis requires time intensive shipping and testing in southern labs. As you are aware, even small time delays can significantly impact the remediation program, as the construction season in the far north is quite short.

Defence Construction Canada believes that the risks from oil/grease are adequately addressed through the sampling and testing of the contact waters for TPH, and would like to request that the NWB consider modifying the above noted licences, as the inclusion of phenols may cause unnecessary delays in the project.

Sincerely,

Douglas Craig, M.Sc.
Environmental Officer
DEW Line Clean Up

Defence Construction Canada
Constitution Square, Suite 1720, 350 Albert St.,
Ottawa, Ontario
K1A 0K3
Phone: (613) 998-7288
Fax: (613) 998-0468