



Your file - Votre référence
1BR-CLI0914

March 8, 2017

Our file - Notre référence
IQALUIT-#1135856

Licensing Department
Nunavut Water Board
GJOA HAVEN, NU X0E 1J0

Sent via email: licensing@nwb-oen.ca

Re: Renewal Amendment Application, Water Licence No. 1BR-CLI0914

To Whom It May Concern,

Thank you for providing an opportunity to review the Indigenous and Northern Affairs Canada's Contaminated Sites Program application to renew and amend the Type B Water Licence issued for its PIN-B (Clifton Point) Long Term Monitoring Program, Water Licence No. 1BR-CLI0914.

A memorandum is provided for the Nunavut Water Board's consideration. Comments and recommendations are provided pursuant to Indigenous and Northern Affairs Canada's mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

Please do not hesitate to contact me by telephone at 867-975-4555 or email at david.abernethy@aandc-aadnc.gc.ca for further information.

Sincerely,

David Abernethy
Regional Coordinator
Water Resources Division
Resource Management Directorate
Indigenous and Northern Affairs Canada
IQALUIT, NU X0A 0H0

Encl.

Cc. Jean Allen, Indigenous and Northern Affairs Canada
Ian Parsons, Indigenous and Northern Affairs Canada
Erik Allain, Indigenous and Northern Affairs Canada



Memorandum

To: Licensing Department, Nunavut Water Board

From: David Abernethy, Indigenous and Northern Affairs Canada, Water Resources Division

Cc: Jean Allen, Indigenous and Northern Affairs Canada, Contaminated Sites Program

Date: March 8, 2017

Re: Renewal Amendment Application, Water Licence No. 1BR-CLI0914

Licensee: Indigenous and Northern Affairs Canada, Contaminated Sites Program

Project: PIN-B (Clifton Point) Long Term Monitoring Program

Region: Kitikmeot

A. Background

On February 8, 2017, the Nunavut Water Board (NWB or Board) invited interested parties to comment on Indigenous and Northern Affairs Canada's (Licensee) application to renew and amend Water Licence No. 1BR-CLI0914. This authorization is specific to the former PIN-B (Clifton Point) Intermediate Distant Early Warning Line Site that has undergone reclamation. Interested parties were asked to provide comments by today, March 8, 2017.

The Licensee conducted on site remediation works in 2009 and 2010. These works included the consolidation and off-site disposal of hazardous soils and materials; the demolition of buildings and structures; the excavation and consolidation of wastes from historical dumps; and the clean-up of site debris. Non-hazardous wastes were placed in a non-hazardous waste landfill (NHWL) that was constructed on-site for that purpose. The NHWL was constructed and operated between 2009 and 2010. Landfill operations were completed in 2010.¹

The Licensee requires an amended and renewed water licence to continue long term monitoring activities at the site.

¹ Indigenous and Northern Affairs Canada. *Executive Summary: PIN-B Clifton Point Water Licence Amendment and Long Term Monitoring Program*. July 22, 2014.

B. Results of review

On behalf of INAC's Water Resources Division, the following comments and recommendations are provided.

1. Water Use and Waste Disposal

Reference

Indigenous and Northern Affairs Canada. *Fwd: 1BR-CLI0914 and 1BR-LOR0813 Request Status on Submission*. Email from Jean Allen, Indigenous and Northern Affairs Canada, to Cynthia Ene, Nunavut Water Board. December 5, 2016.

Comments

The Licensee confirmed that when the site is accessed for long term monitoring purposes, approximately 6 litres of water will be collected for analysis and up to 0.5 cubic meters of waste will be backhauled for disposal in municipal facilities.

Recommendations

Indigenous and Northern Affairs Canada's Water Resources Division has no issue with the collection of small quantities of water for analysis or the backhauling of solid waste produced during monitoring activities (e.g., paper towels, plastic packaging, tubing, filters, etc.) for disposal at an approved municipal landfill.

The water licence should be amended to include the following terms and conditions:

- A smaller water consumption allowance (e.g., one cubic meter of water per day);
- A requirement to not practice on-site landfilling of domestic waste, unless otherwise approved by the Board in writing;
- A requirement to provide the Board with documented authorization from any community in Nunavut receiving wastes associated with the project prior to any backhauling and disposal of wastes to those communities;
- A requirement to backhaul and dispose of all hazardous wastes, waste oil and non-combustible wastes associated with the project to a licensed disposal site; and
- A requirement to maintain records of all waste backhauled and records of confirmation of proper disposal of backhauled waste. This information should be included in Annual Report submissions.

2. Spill Contingency Plan

Reference

Indigenous and Northern Affairs Canada. *Site Specific Spill Contingency Plan, Clifton Point PIN-B Cleanup*. March 26, 2010.

Comment

The Licensee's existing Spill Contingency Plan does not reflect the project's current status. It is specific to site remediation activities that were completed in 2010.

Recommendation

The Licensee should provide an updated Spill Contingency Plan that reflects the project's current status.

3. Term of Licence

Reference

Indigenous and Northern Affairs Canada. *Completed Application for Water Licence Amendment, Nunavut Water Board*. Block 25. July 22, 2014.

Comment

The Licensee has requested that the renewed licence expire in September 2035. This term will allow continued long term monitoring of the project's remediation status.

Recommendation

Indigenous and Northern Affairs Canada's Water Resources Division is supportive of a renewed and amended water licence that would expire in September 2035.