PIN-B (Clifton Point) Long Term Monitoring Plan

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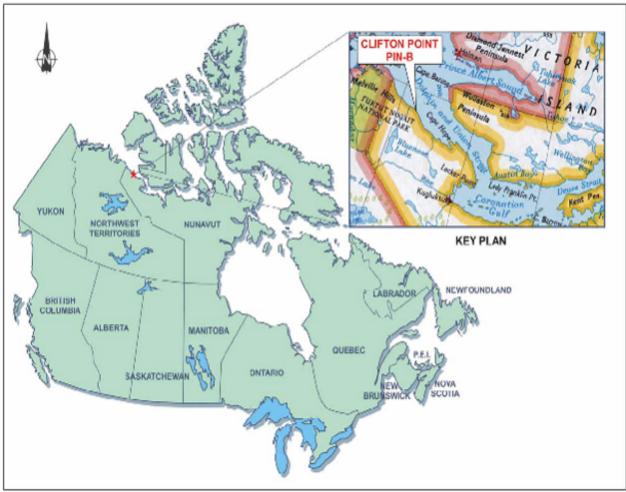
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1.0 Introduction

1.1 Site Location

Clifton Point is located on the coast of Amundsen Gulf (Beaufort Sea) in Nunavut. The nearest communities are Paulatuk, NWT, about 220 km to the northwest, and Kugluktuk, Nunavut about 220 km to the southeast. The site is situated about 1 km inland from the coast (see Figure 1 and Appendix A).



Source (inset): National Geographic (1999).

Figure 1: PIN-B (Clifton Point) site location

1.2 Background

PIN-B, Clifton Point, was reserved by the Department of National Defence (DND) in 1956 and the former PIN-B Intermediate DEW Line site was constructed in 1957 and subsequently closed and abandoned in 1963. In 1965, responsibility for the site reverted to INAC. The PIN-B station was comprised of a five-module building train (the "module train"), a warehouse, a garage, a

small house for Inuit staff (the "Inuit House"), a petroleum, oil and lubricants (POL) storage facility with associated distribution system, and a felled radar tower. In addition to the Station facilities, a cargo beaching area was constructed at the beach area. A second POL storage facility was located at the beach, in the vicinity of the cargo beach area. Two airstrips were constructed at the site: the primary airstrip is approximately 1 km long, located south of the beach area, while the second airstrip is much shorter, with a length of 300 m and located northwest of the main strip. Gravel roads were built linking the airstrip, water supply lake and beaching area to the station area. A small construction camp was erected during building of site facilities but was demolished once site construction was completed. The former camp of an Inuit family is located approximately 1.5 km southeast of the PIN-B site.

An environmental assessment of the PIN-B DEW Line site was initiated in 1985 when DND and Environment Canada visited the site to remove surface contaminants such as PCBs and petroleum, oils and lubricants (POL) and to identify areas of buried materials which could pose environmental risks in the future. Various pieces of PCB-containing equipment were removed from electrical cabinets at the site (172 pieces). Two soil samples collected at the station area (upper site) adjacent to the module train indicated that no PCB residues were present however no other results were reported.

The site was revisited in 1994 by the Environmental Sciences Group (ESG) of Royal Roads Military College at which time a limited sampling program was completed¹. Surface soil and vegetation samples were collected, in addition to wall swabs from the module train and warehouse to investigate possible contamination. Floor tile and piping insulation samples were also taken from the module train in order to investigate possible asbestos content. Background samples were collected from locations that were considered to be unaffected by station activities. This investigation identified soil contamination exceeding Tier I and/or Tier II levels (based on the DND DEW Line Clean-up Criteria) around the module train, garage, sewage outfall, incinerator, warehouse, barrel/vehicle storage areas and sewage outfall. The analyses from the swab samples indicate that there are high levels of PCBs in the paint of the module train, and the floor tiles and insulation have been found to contain asbestos. One landfill was identified on site, 500 m west of the beach POL area and 40 m from the ocean. The majority of the debris in the Beach landfill was buried, however some evidence of erosion on the ocean facing side was observed. However, these investigations did not include an assessment of hydrocarbon contamination.

Finally, a Phase III Environmental Site Assessment² was completed by UMA during the summer of 2007. A total of approximately 570 m³, including 550 m³ from dump excavations, of soils with concentrations of metals, PCBs, which exceed the Tier I levels of the Abandoned Military Site Remediation Protocol³, were identified at the site. This soil was to be used as intermediate fill in the non-hazardous landfill. An additional 1,210 m³, including 880 m³ from dump excavations, of soils was identified in excess of Tier II levels. Following a cost benefit analysis

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¹ Environmental Study of Abandoned DEW Line Sites – One Auxiliary and Eight Intermediate Sites in the Canadian Arctic (Mar, 95)

² Phase III Environmental Site Assessment, UMA Engineering (Mar, 08)

³ Indian and Northern Affairs Canada, Abandoned Military Sites Remediation Protocol - March, 2009

it was determined that this soil should be shipped off site for disposal. In addition, 80 m³ of Type A (F3-F4) and 1,360 m³ of Type B (F1-F3) hydrocarbon impacted soils were identified. The Type A soil was to be used as intermediate fill in the non-hazardous waste landfill and the Type B was to be treated onsite by alluing.

A total of 194 m³ of hazardous materials have been identified at the site. Materials coated with PCB amended paint (PAP) comprise the majority of the hazardous material volume. The remainder of the hazardous material includes batteries, asbestos-containing materials, and drum contents. All hazardous material was to be shipped off site for disposal. Based on the combined results of the surface debris inventory, barrel assessment and demolition inventory, approximately 2,180 m³ of non-hazardous waste was identified. This material was to be placed in the constructed non-hazardous landfill.

Seven existing dumps were investigated, including six that were previously unidentified in past assessments at the PIN-B site. The total volume of buried debris within the sites is approximately 6,600 m³. Based on the location and condition of the dumps and contaminant migration assessment results, each dump site was assigned as a Class A, B or C dump according to the INAC protocol. Two dumps were classified as Class C, and will be covered in place. A third dump was classified as Class C, but excavation will be undertaken, based on UMA's recommendation, due to the proximity to a lake. Two dumps were classified as Class B and will require excavation. Finally, two dumps were classified as Class A and require excavation. Therefore, five of the seven dumps will be excavated due to stability or proximity to environmentally sensitive areas.

Water sample collected from Drinking Water Lake suggests that some chronic inputs of inorganic elements may have occurred, however, contaminant levels are all low, and no significant impacts were identified.

The PIN-B (Clifton Point) Remedial Action Plan⁴ was used to develop the specifications and request for proposal for the PIN-B site. This package was posted on MERX November 10, 2008 and closed January 13, 2009. The bids were reviewed and the contract awarded to E. Grubens Transport Ltd (EGT) on April 1, 2009. EGT was able to fully mobilize in 2009 and set up camp and complete some remediation activities. Final remediation activities were completed in the 2010 field season and final demobilization of all supplies, equipment and waste occurred on August 18, 2010.

The overall objectives for the PIN-B (Clifton Point) remediation project were:

- To minimize environmental impacts to humans and wildlife at the site;
- To ensure the project is completed complying with all legal obligations;
- To ensure the project is undertaken in accordance with all Federal and/or Departmental policies;
- To increase public perception and attitude toward remediation activities;
- To promote the social and economic benefits of the project for Inuit; and
- To reduce liabilities to the Crown.

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⁴ Remedial Action Plan, AECOM Canada Ltd (Nov, 09)



2.0 Monitoring Plan

As dictated by the Nunavut Water Board Licence 1BR-CLI0914, the following monitoring activities were completed during remediation activities at the site:

Monitoring	Description	Parameters	Frequency
Station ID	_		
PIN-1	Raw water supply intake at Freshwater	Volume	Daily
	Lake or the unnamed lake 200m south		
	of the airstrip		
PIN-2a	Final Discharge Point from the Sewage	Volume and	As Necessary
	Disposal Facilities, Lagoon 1	Water Quality	
PIN-2b	Final Discharge Point from the Sewage	Volume and	As Necessary
	Disposal Facilities, Lagoon 2	Water Quality	
PIN-3	Final Point of Discharge from the Land	Water Quality	As Necessary
	Farm		
PIN-4	Final Point of Discharge from the Non-	Water Quality	As Necessary
	Hazardous Waste Landfill	_	

Specific results related to the monitoring of these points has been provided in the annual reports as specified in Part B, Item 1 of the PIN-B (Clifton Point) Water License. In addition, the monitoring of the natural environment and post-closure condition of the site was undertaken, as described in the following sections.

Natural Environment Monitoring

Natural environment data has been collected during the environmental assessment and during community meetings. In addition, information was also collected during the remediation of the site and will also be gathered during monitoring of the Non-Hazardous Waste Landfill. This data includes local and traditional knowledge of the site and will serve as a reference for post construction monitoring. The purpose of collecting this new data is not to find correlations with the landfill monitoring data but rather to provide anecdotal data related to the presence of wildlife and changes over time. The information to be gathered is included in the Visual Monitoring Checklist (see Appendix B).

The data to be collected during the Long Term Monitoring site visita will include:

- Wildlife sightings (species, number, gender, juveniles);
- Other evidence of recent presence of wildlife (droppings, tracks, feathers/fur, carcass remains, etc.)
- Wildlife activity (summering/nesting/denning, migratory/passing through);
- Qualitative assessment of relative numbers versus previous years (more, same, less); and
- Revegetation of disturbed areas versus previous years (more, same, less).



Information regarding visits made to the site by local people may also be collected through consultations with local community members and/or local Hunter and Trapper Associations (HTOs) and/or the Kitikmeot Inuit Association (KIA). The type of information that may be collected includes:

- Wildlife sightings;
- Use by people for traditional activities;
- Season(s):
- Activities (hunting, fishing, trapping, camping, other harvesting);
- Relative frequency versus previous years (more, same, less);
- Wildlife species present (sightings or evidence);
- Wildlife presence versus previous years (more, same, less);
- Health of wildlife observed or harvested (good, average, poor); and
- Relative health of wildlife versus previous years (better, same, worse).

2.2 Post Construction Monitoring

Construction of the Non-Hazardous Waste Landfill PIN-B (Clifton Point) was completed and closed in the summer of 2010 (see Appendix A for the location of the Non-Hazardous Waste Landfill). The Non-Hazardous Waste Landfill was designed to contain non-hazardous materials only. It was constructed on native ground, with all organic matter removed, and consists of four perimeter berms constructed of granular material. The non-hazardous waste was placed in the landfill in layers consisting of 0.5 metre lifts of waste covered by 0.15 metres of granular fill. Once all the waste were placed a final cover consisting of a minimum of 1.0 metres of granular fill will be used to cap the Non-Hazardous Waste Landfill.

The Non-Hazardous Waste Landfill at PIN-B (Clifton Point) contains the following material:

- -F3 and F4 fraction hydrocarbon contaminated soil;
- -Non-hazardous demolition debris, such as timbers, plywood, and sheet metal;
- -Non-hazardous site debris, such as scrap metal and wood;
- -Non-hazardous debris/soil excavated from landfills:
- -Creosote timbers:
- -Double-bagged asbestos; and
- -Tier I contaminated soil (Lead concentration between 200 and 500ppm and PCB concentrations between 1 and 5 ppm).

Water

Samples will be taken from the four (4) monitoring wells installed around the Non-Hazardous Waste Landfill. These samples will be analysed and the results will be compared to those collected from background samples. The parameters that will be analyzed include:

- -Petroleum Hydrocarbons:
- -Total and Dissolved Metals;
- -Major Ions, Hardness, Total Dissolved Solids, Total Suspended Solids;
- -pH, Conductivity; and
- -Polychlorinated biphenyls (PCBs).

Visual

This activity will check the physical integrity of the Non-Hazardous Waste Landfill and look for evidence of erosion, ponding, frost action, settlement and lateral movement through the use of a Visual Monitoring Checlist (see Appendix B). Photographs will be taken to document the condition of the Non-Hazardous Waste Landfill and substantiate the recorded observations.

Soil (as necessary)

Soil sampling will be limited to locations where seepage or staining has been identified as part of the visual inspection. When required, soil samples will be collected over the interval of 0 to 0.15 metres and 0.35 to 0.50 metres depth. The parameters that will be analysed include:

- -Polychlorinated biphenyls (PCBs);
- -Petroleum Hydrocarbons; and
- -Arsenic, Cadmium, Cobalt, Chromium, Lead, Nickel, and Zinc.

2.3 Monitoring Schedule

The post construction monitoring frequency will follow the schedule identified in the INAC Abandoned Military Sites Remediation Protocol⁵. The three phases recommended by the protocol are:

- Phase I: years 1, 3 and 5;
- Phase II: years 7, 10, 15 and 25 (if required); and
- Phase III: beyond year 25 (if required).

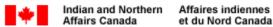
Monitoring at the PIN-B (Clifton Point) site is anticipated to begin in 2011. Phase I monitoring will take place in years 2011, 2013 and 2015. Each of the four monitoring events discussed above (i.e. natural environment, water, visual and soil) will be conducted during each of the three site visits. The visits will be carried out sometime during the summer months of June, July, August or September. An evaluation of Phase I monitoring data would be carried out at the end of the 2015 program to confirm whether or not additional monitoring is required. If additional monitoring (Phase II) is required, it will be carried out during the years 2017, 2020, 2025 and 2035. At the completion of the 25 year monitoring program a review will take place and the need for continued monitoring will be assessed.

3.0 Quality Assurance / Quality Control Measures

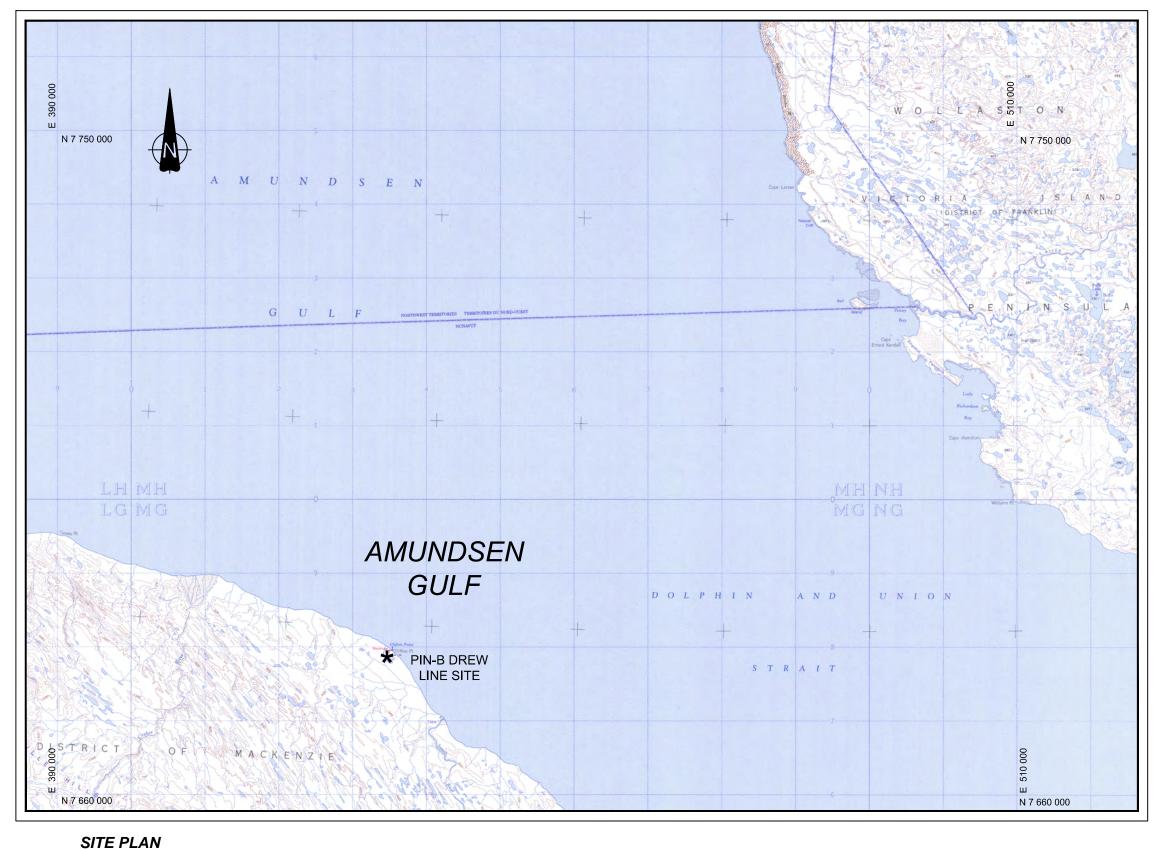
All sampling, sample preservation and analyses will be conducted in accordance with methods prescribed in the current edition of "Standard Methods for the Examination of Water and Wastewater". All analysis will be performed in a Canadian Association of Environmental Analytical Laboratories (CAEAL) Accredited Laboratory.

Quality Assurance/Quality Control (QA/QC) will be consistent with CAEAL regulations and guidelines. At least 20% of samples will be taken and analyzed in duplicate and all appropriate QA/QC data will be generated and reported.

⁵ Indian and Northern Affairs Canada, Abandoned Military Sites Remediation Protocol - March, 2009



APPENDIX A: PIN-B (Clifton Point) As-Builts





KEY PLAN

NOT TO SCALE

REFERENCE:

1. Government of Canada, Natural Resources Canada, Centre for Topographic Information - TOPO-087C_2_0 Map

NOTE:

The coordinate system shown on this drawing is

UTM with NAD83 datum, Zone 13, Meter; Central Meridian 105d W



Public Works and Government Services Canada

Travaux publics et Services gouvernementaux Canada



Indian and Northern Affairs Canada

Affaires indiennes et du Nord Canada

PIN-B REMEDIATION PROGRAM

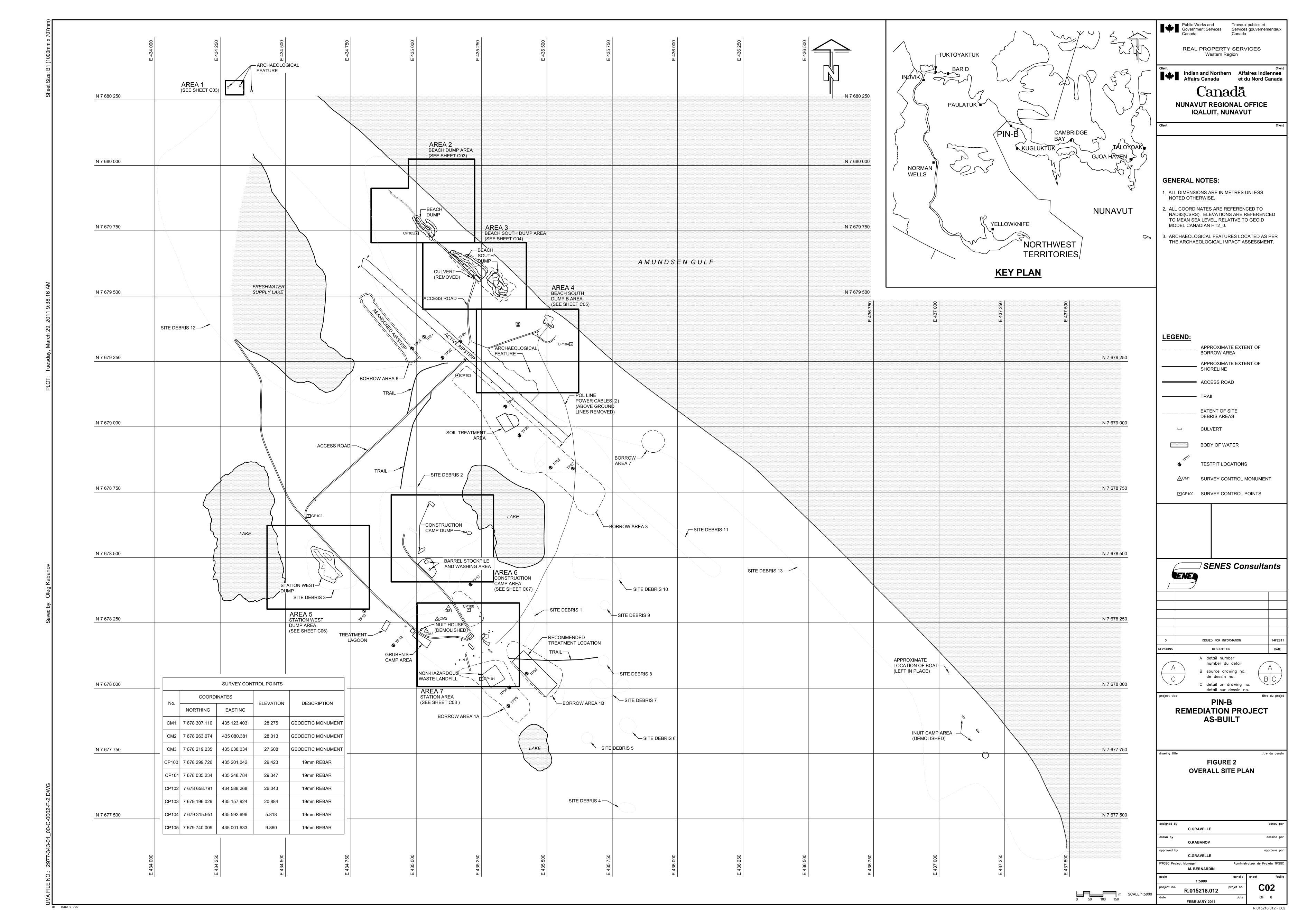
PIN-B DREW LINE SITE LOCATION

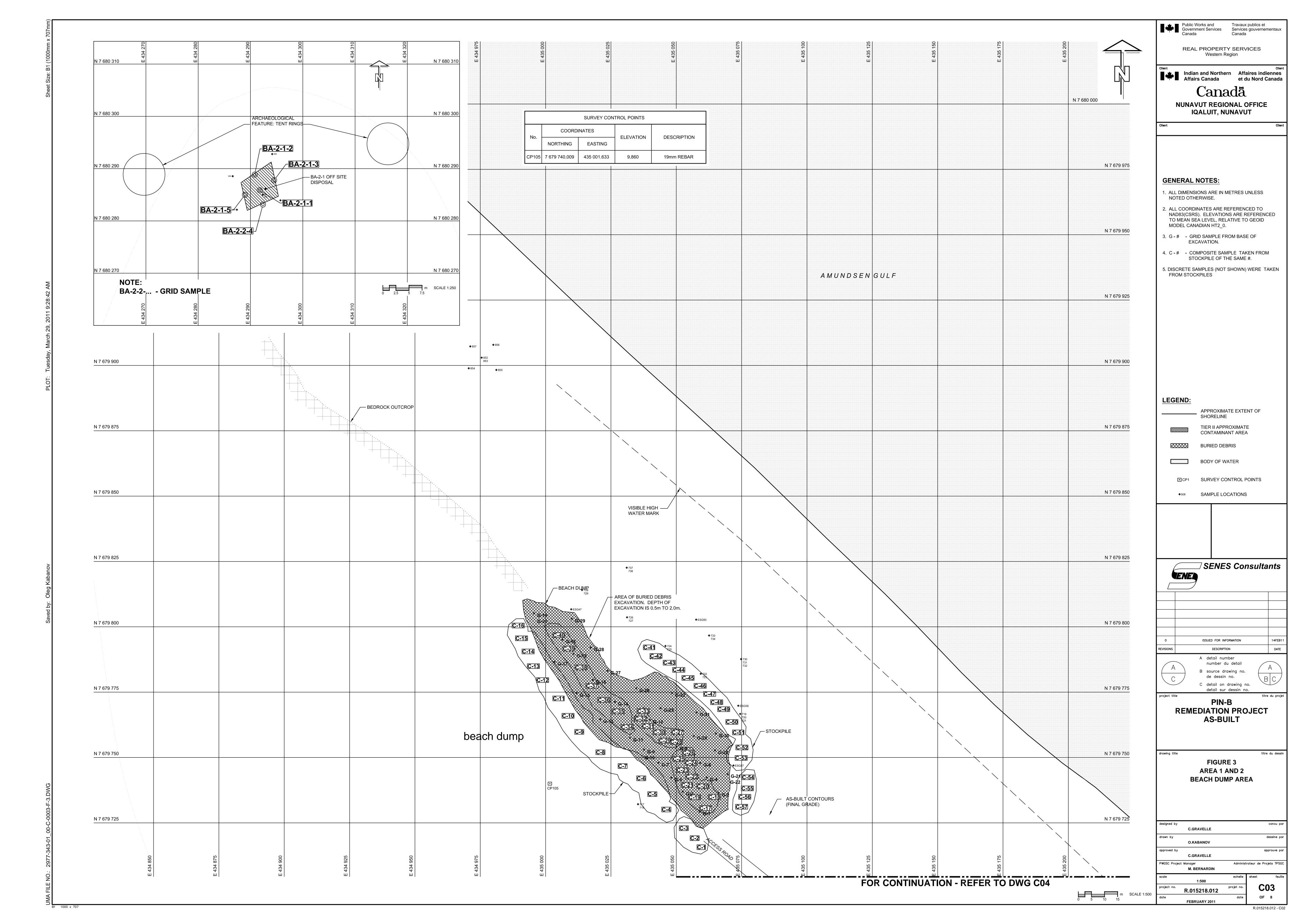


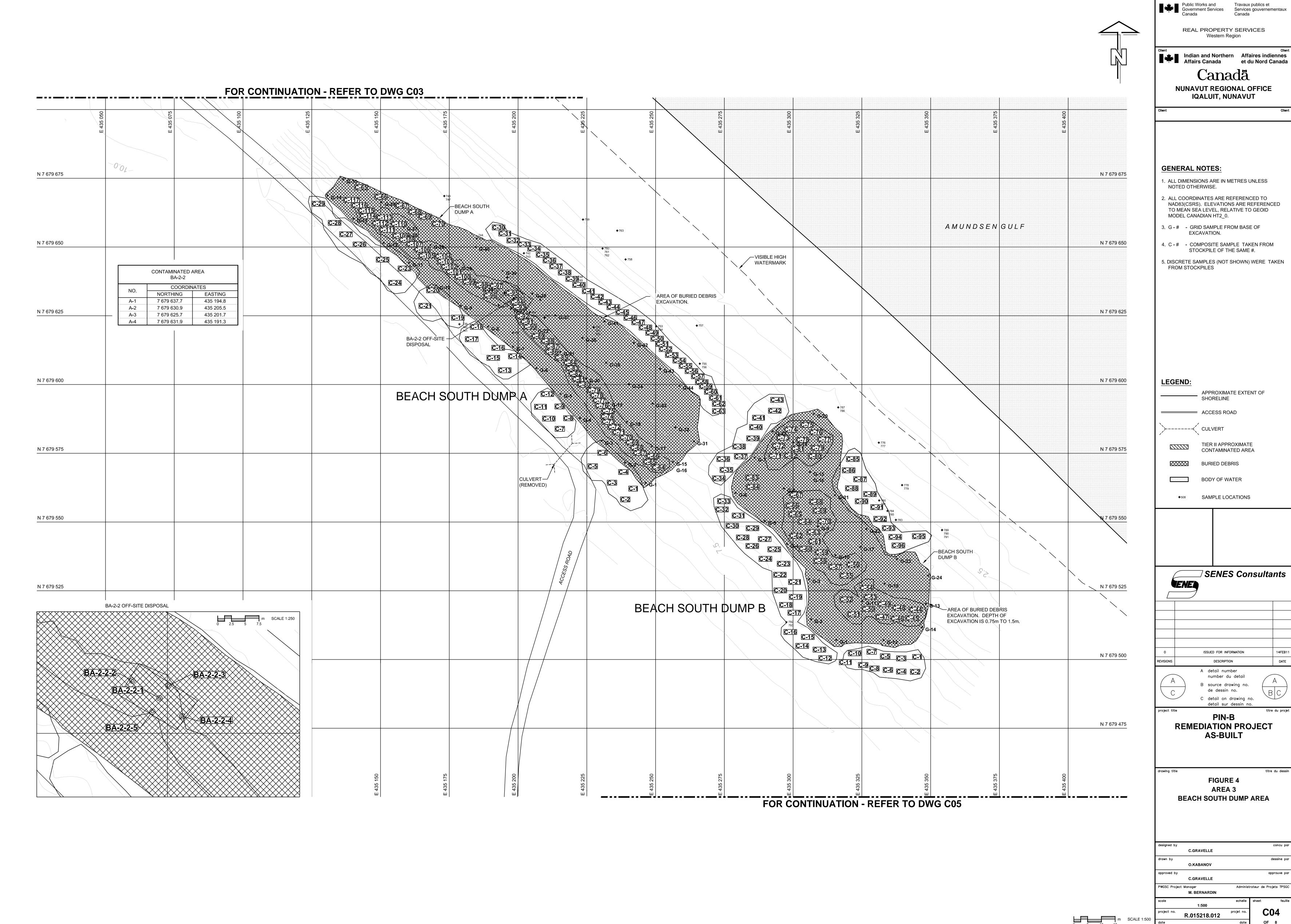
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Figure

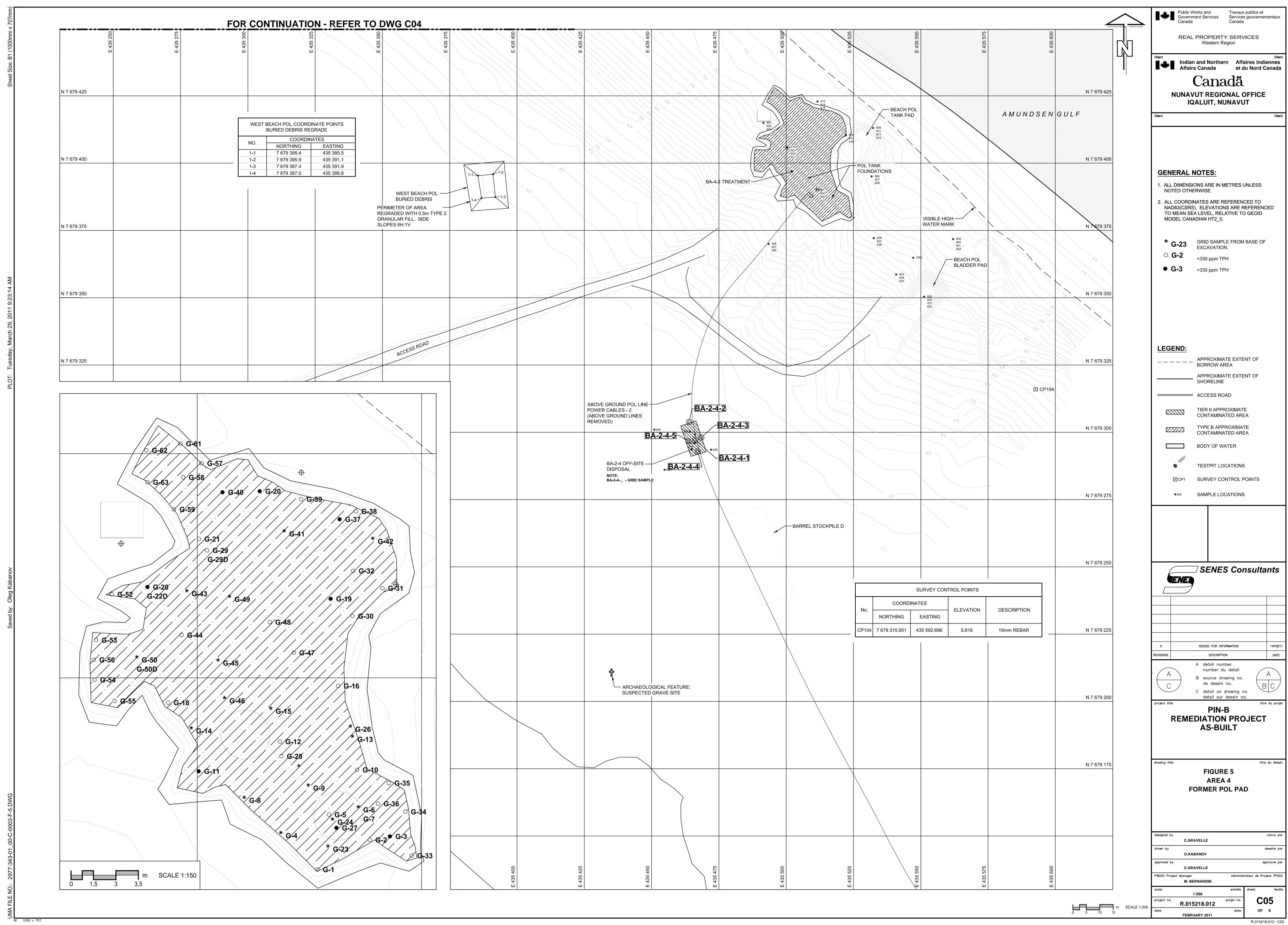
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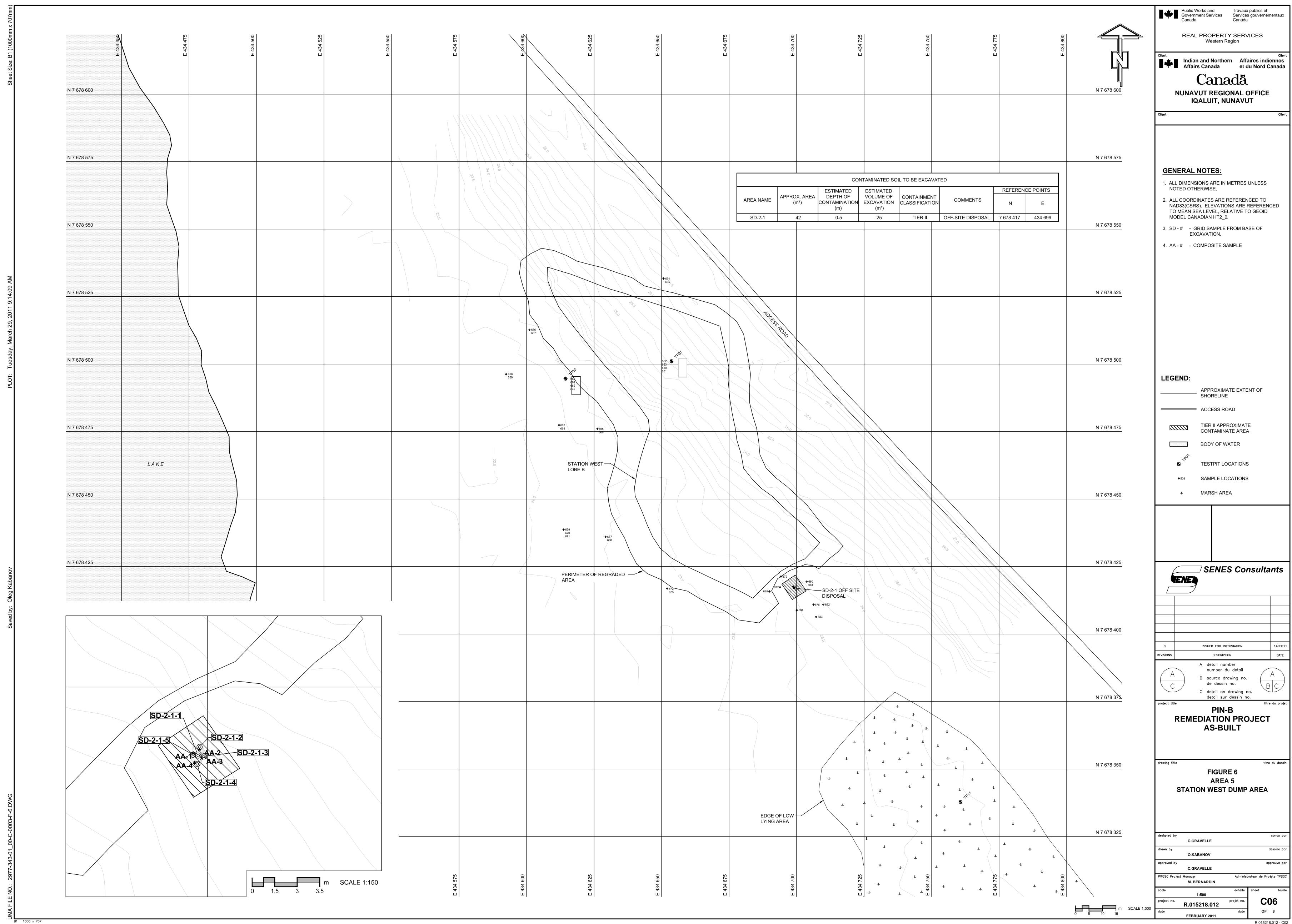


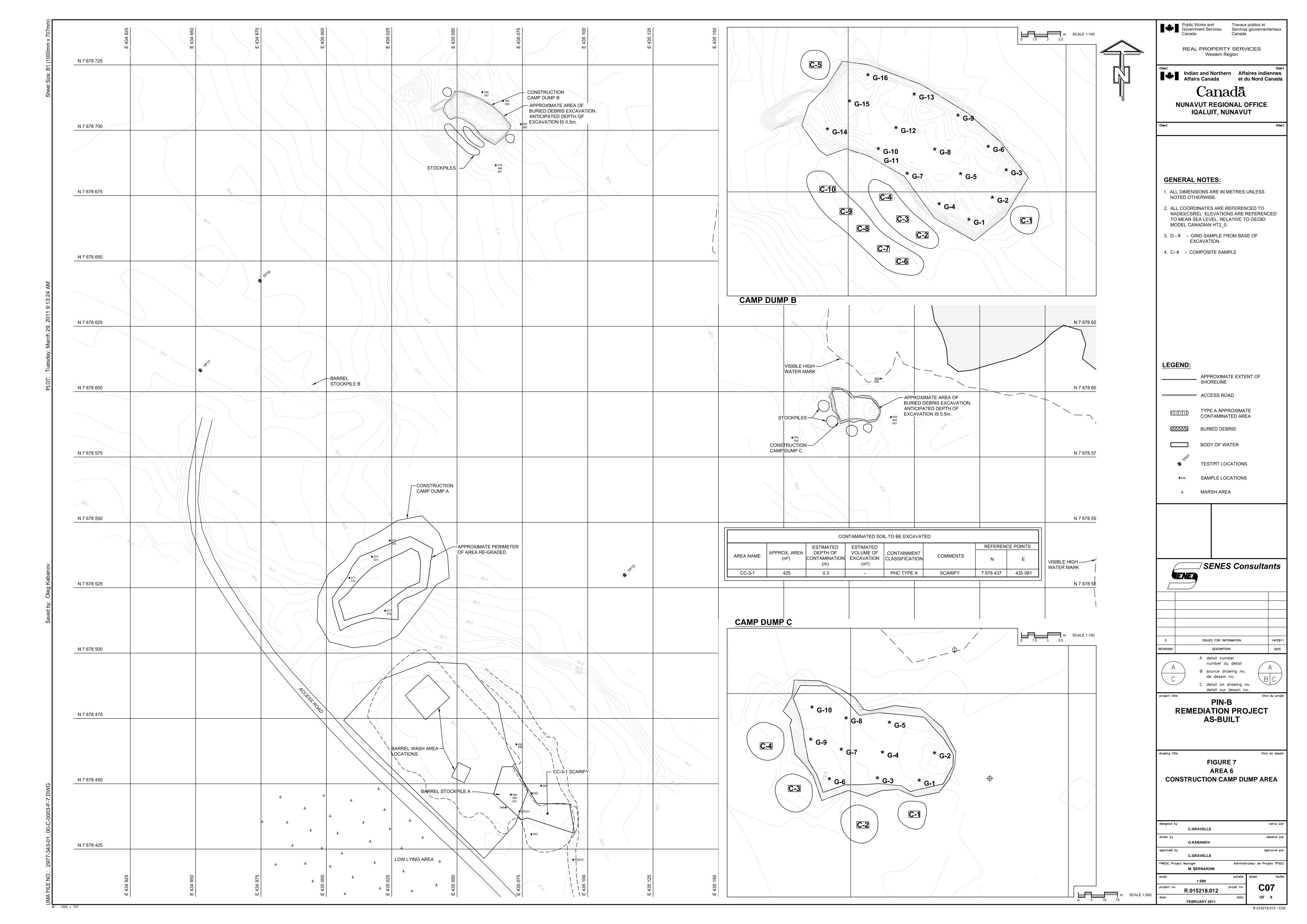


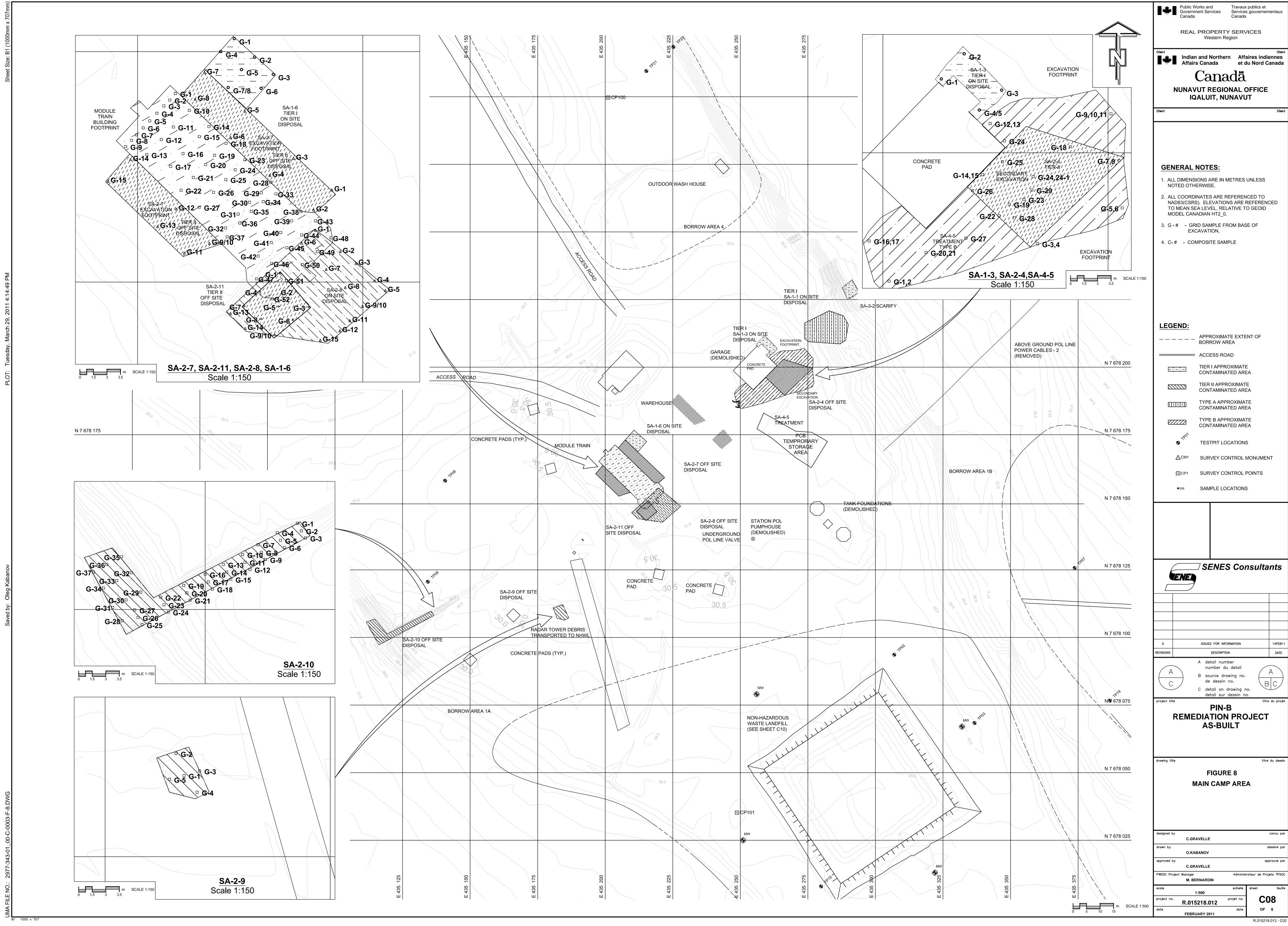


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APPENDIX B: Visual Monitoring Checklist



	Date:						
	Site:						
Note	Response	Extent	Description				
	Yes/No	Provide information as applicable (i.e. length/width/depth/type)	Features of note, photographic reference with scale, point of view anddirection				
Natural Environmental Monitoring							
Wildlife Sightings Evidence of							
Wildlife							
Wildlife Activity							
Relative Number							
Evidence of Revegetation							
Landfi	ll Location:						
Post-Closure Landfill Monitoring							
Evidence of Settlement							
Evidence of Erosion							
Evidence of Frost Action							
Animal							
Burrows Vegetation Present							
Vegetation Stresses							
Staining Present							
Seepage							
Points Exposed							
Debris Condition of							
Instruments							
Other Features							