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7 July 2011

Ida Porter Licensing Administrative Assistant Nunavut Water Board P.O. Box 119 Gjoa Haven, NU X0B 1J0

Via email: <u>iporter@nunavutwaterboard.org</u>

RE: 1BR-CLI0914 Long Term Monitoring Plan Part K, 1 Kitikmeot Region

Environment Canada (EC) has reviewed the above-mentioned Plan submitted to the Nunavut Water Board (NWB). The following specialist advice has been provided pursuant to the Canadian Environmental Protection Act, Section 36(3) of the Fisheries Act, the Migratory Birds Convention Act, and the Species at Risk Act.

EC File: 4517 000 039 NWB File: 1BR-CLI0914

Indian and Northern Affairs Canada (INAC) has prepared the PIN-B (Clifton Point) Long Term Monitoring Plan as a requirement of Part K, Item 11 of water license 1BR-CLI0914. The PIN-B Clifton Point site is a former DEW Line site abandoned in 1963 and is currently undergoing remediation. The nearest communities are Paulatuk, approximately 220 km to the northwest, and Kugluktuk, approximately 220 km to the southeast.

Upon review of the Plan, EC provides the following comments and recommendations for the NWB's consideration:

General

- The proponent shall not deposit, nor permit the deposit of chemicals, sediment, wastes, or fuels associated with the project into any water body. According to the *Fisheries Act*, Section 36 (3), the deposition of deleterious substances of any type in water frequented by fish, or in any place under any conditions where the deleterious substance, or any deleterious substance that results from the deposit of the deleterious substance, may enter any such water, is prohibited.
- All mitigation measures identified by INAC, and the additional measures suggested herein, should be strictly adhered to in conducting project activities. This will require awareness on the part of INAC's project representatives (including contractors) conducting operations in the field. EC recommends that all field operations staff be made aware of INAC's commitments to these mitigation measures and provided with appropriate advice and training on how to implement these measures.
- In the plan the footer reads CAM-D (Simpson Lake) Remediation Project. This should be revised to reflect the correct title/location for the plan.

Canada

• EC notes that INAC proposes to review monitoring data at year 5 of Phase I (Section 2.3 Monitoring Schedule). EC recommends that a review is completed prior to year 5, i.e. at year 3, to ensure that there are no issues with the landfill. EC suggests that contingency plans to address the potential for instability at the landfills be included in this Plan.

If there are any changes in the project EC should be notified as further review may be necessary. Please do not hesitate to contact the undersigned with any questions or comments with regards to the foregoing at (867) 975-4631 or by email at Paula.C.Smith@ec.gc.ca

Yours truly,

Paula C. Smith

Environmental Assessment Coordinator

cc: Carey Ogilvie (Head, Environmental Assessment North, EPO, EC, Yellowknife, NT)
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