



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence
1BR-COR----
Our file - Notre référence
GCDocs#112378288

May 09, 2023

Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: licensing@nwb-oen.ca

Re: Crown-Indigenous Relations and Northern Affairs Canada's Review of the Coral Harbour Site Remediation Project Application for New Water Licence 1BR-COR----

Dear Mr. Dwyer,

Thank you for your April 14, 2023, invitation to review the Coral Harbour Site Remediation Project Application for New Water Licence 1BR-COR----

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the application pursuant to its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*. Please find CIRNAC comments and recommendations in the attached Technical Memorandum.

If there are any questions or concerns, please contact me at Aminul.Haque@rcaanc-cirnac.gc.ca or Andrew Keim at (867) 975-4550 or Andrew.Keim@rcaanc-cirnac.gc.ca.

Sincerely,

Aminul Haque
Regional Water Management Coordinator



Technical Review Memorandum

Date: May 09, 2023

To: Richard Dwyer, Manager of Licensing, Nunavut Water Board

From: Aminul Haque, Regional Water Management Coordinator, CIRNAC

Subject: Crown-Indigenous Relations and Northern Affairs Canada's Review of the Coral Harbour Site Remediation Project Application for New Water Licence 1BR-COR----.

Region: ☐ Kitikmeot ☒ Kivalliq ☐ Qikiqtani

A. BACKGROUND

On April 14, 2023, the Nunavut Water Board (NWB) invited interested parties to comment on Crown-Indigenous Relations and Northern Affairs Canada Contaminated Sites Program's (the "Applicant") application for a new Type B water licence (1BR-COR----) associated with its Coral Harbour Site Remediation Project.

The Coral Harbour Site is located on Municipal Land, approximately 10 kilometres (km) northwest of the Hamlet of Coral Harbour, NU, on Southampton Island. It was used between the 1940s to the mid-1950s as training areas and a base for Northern operations by the US and Canadian Militaries. Past legal studies indicated that a large amount of contamination on the site could be traced to the Crown's military operations. These areas were used as staging areas to support operations across Northern Canada. In the 1970s, military operations ceased in these areas, the airfield became the municipal airport, and the rest of the site was abandoned.

The areas of environmental concerns identified at the site are: area of Tar Barrels, the area of Full Barrels, a Barrel Cache, a Former Amy Base, area of the debris of the Former Airport and the Former Farm Tank area. A project-specific Remedial Action Plan will remediate the site submitted as part of the application. A seasonal 38-person capacity camp will support site remediation activities—the application mentioned using municipal water supply and waste facilities for the remediation work. NWB will be informed if the remediation contractors look for alternative sources of water supply and waste disposal systems.

CIRNAC's Water Resource Division provides the following comments and recommendations about the application. A summary of the subjects of recommendations can be found in Table 1. Documents reviewed as part of this submission can be found in Table 2 of Section B. Detailed technical review comments can be found in Section C.



Table 1: Summary of Recommendations

Recommendation Number	Subject
R-01	Camp Sewage and Greywater
R-02	Landfarm Operation
R-03	Post-closure Monitoring
R-04	Abandonment and Reclamation

B. DOCUMENTS REVIEWED AND REFERENCED

The following table (Table 2) lists the documents reviewed under the submission and references during the review.

Table 2: Documents Reviewed and Referenced

Document Title	Author, File No., Rev., Date
Screening Decision Report, NIRB File No.:22KN046	Nunavut Impact Review Board, October 06, 2023
Application for Water License	Crown-Indigenous Relations and Northern Affairs Canada Contaminated Sites Program, April 06, 2023
Coral Harbour Former Military Site Remediation Project, Project Proposal Report	Stantec Consulting Ltd, April 01, 2022
Updated Remedial Action Plan, Coral Harbour Site, Nunavut (Final Report)	Stantec Consulting Ltd, March 31, 2022
Archaeological Impact Assessment – Public Report Coral Harbour Site, Nunavut (Final Report)	Stantec Consulting Ltd, February 2022
Fuel and Hazardous Material Spill Contingency Plan	Crown-Indigenous Relations and Northern Affairs Canada, Nunavut Regional Office, March 2023
Nunavut Planning Commission Letter of Conformity	Nunavut Planning Commission, June 21, 2022
Site Maps, Coral Harbour	Stantec Consulting Ltd, February 2022
Public Notice of New Application, Coral Harbour Site Remediation Project	Nunavut Water Board, April 14, 2023



C. RESULTS OF REVIEW

1. Camp Sewage and Greywater

Comment:

The submitted questionnaire states that up to 1,900 litres of sewage and up to 3,800 litres of greywater will be produced daily during site remediation activities. Item 32 of the submitted questionnaire also said, “The project contractors will decide whether to use the municipal sewage treatment system or a sewage to treat the sewage generated from the site. The plan that is eventually selected by the contractors will be forwarded to NWB as soon as it is available.”

Recommendation:

(R-01) Applicant should submit and have an NWB approved operation and management plan specific to its sewage and greywater treatment before starting any site remediation activities.

2. Landfarm Operation

Comment:

The submitted questionnaire states that 1900 m³ of Type B hydrocarbon-contaminated soils will be excavated and remediated at an on-site landfarm treatment facility. This facility's operations and management plan cannot be found in the submitted application.

Recommendation:

(R-02) Applicant should submit and have an NWB approved operation and management plan specific to its landfarm treatment facility.

3. Post-closure Monitoring

Comment:

The application does not include any post-closure monitoring activities, which will be implemented following site remediation activities. These monitoring activities would help determine the efficiency of completed site remediation activities. The Remedial Action Plan's section 9.3 states: “The on-site NHW facility will require post-remedial monitoring. Currently, it is assumed that this will include: • Visual monitoring to observe the physical integrity of the facility including observations for possible settling, erosion, frost action, vegetation, leachate, staining, etc. • Long-term groundwater monitoring of three to four groundwater monitoring wells.”

Recommendation:

(R-03) The project licence should require a post-closure monitoring plan to be submitted for review and approval within three months of completing site remediation activities.



4. Abandonment and Reclamation

Comment:

The project involves mobilizing a 38-person seasonal camp, storage areas for fuel and other hazardous materials, a landfarm treatment area, and utilizing various assets (equipment and supplies). However, no details have been provided on how the infrastructure and assets will be managed at the end of each field season, during an interim closure phase, or once site remediation activities have been completed.

Recommendation:

(R-04) The project licence should require the Applicant to submit an Abandonment and Reclamation Plan for infrastructure constructed to support site remediation activities and assets brought to the site.