Crown-Indigenous Relations and Northern Affairs Canada
Relations Couronne-Autochtones et Affaires du Nord Canada

Nunavut Regional Office (NRO)
P.O. Box 2200
Iqaluit, NU, X0A 0H0

May 23, 2023

Richard Dwyer
Manager of Licensing
Nunavut Water Board (NWB)
P.O. Box 119
Gjoa Haven, NU X0B 1J0

Dear Mr. Dwyer,

RE: Coral Harbour Site Remediation Project Water Licence Application 1BR-COR----

Responses to Comments from Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)'s Water Resources Division and Environment and Climate Change Canada (ECCC)

The department of Crown-Indigenous Relations and Northern Affairs Canada Contaminated Sites Program (CIRNAC CSP) acknowledges receipt of review comments on our current application to the NWB for a Type B Water Licence for the remediation of the Coral Harbour site from the CIRNAC Regional Water Management Coordinator and the Environmental Assessment Officer at Environment and Climate Change Canada (ECCC).

The information requested in the comments received from the CIRNAC Regional Water Management Coordinator are typically provided to the NWB following the issuance of the Water Licence and prior to the commencement of work on site. There are several mandatory submittals that the project's contractor is required to provide including specific guides, plans and manuals pertaining to the work site. These plans are currently being prepared and will be submitted to the NWB for approval prior to the commencement of work on site.

In the meantime, to ensure NWB's processing of the license in a timely fashion, CIRNAC CSP has provided responses to the questions and comments received from both CIRNAC and ECCC in the following document.

Should you require further details, please do not hesitate to contact the Project Manager, Dele Morakinyo, through the contact information details below:

Sincerely,

Dele Morakinyo
Project Manager, Contaminated Sites Program
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Responses to Review Comments Received from CIRNAC

(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.*

This recommendation is fully in line with CIRNAC CSP's mode of operation. Permits and licences are applied for prior to the completion of the tendering process to allow the Board sufficient time to process the application. Therefore, information provided during submission consists of standard details that are relevant to the remediation site. More specific plans are produced and submitted to regulators and other concerned parties once a successful contractor has been selected for the project. The contractor for this project has been selected and is currently working to complete a sewage and greywater treatment plan specific to their camp set up which will include a description of the handling of their camp greywater, camp sewage, and wastewater generated from site activities. This plan will be submitted to the NWB for their review and approval prior to the start of remedial activities.

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

Similar to the sewage and greywater treatment plan, the selected contractor is working to complete a "Type B Contaminated Soil Treatment Plan" for the Coral Harbour site. The plan will lay out the guidelines for the construction, operation and closure of the landfarm and the plan will be submitted to the NWB for review and approval prior to the start of remedial activities.

(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.*

The post closure monitoring plan will be required for low or medium risk waste disposal areas remaining on the site, post-remediation, as per the requirements of the Indian and Northern Affairs Canada (INAC)'s Abandoned Military Site Remediation Protocol (2009). The specific monitoring plan will be developed in the second year of remediation (2024)., The plan will be submitted to the NWB, immediately after completion and before the completion of remediation activities at the site, for review and approval. The post closure monitoring plan will be implemented on the remediated Coral Harbour starting from 2025 for up to 25 years post-remediation.

(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.*

CIRNAC CSP requires the selected contractor to complete this decommissioning plan for the structures to be built over the course of the remediation work. The Abandonment and Reclamation Plan will include details on how the contractor plans to decommission the camp, the wastewater and freshwater facilities and any other facilities constructed in the course of implementing the remediation plan for the site. This plan will be submitted to the NWB for review and approval prior to the commencement of work on the site.

Responses to Review Comments Received from ECCC

Recommendation 1: *ECCC requests clarification on whether the incinerated amount of combustibles is likely to exceed 26 tonnes per year. If it is likely to exceed 26 tonnes per year, ECCC requests that the Proponent provide a schedule for annual incinerator stack testing.*

The estimated volume of waste petroleum products to be incinerated is over 130,000 L or greater than 109 tonnes. The Canada Wide Standards for Dioxins and Furans indicate that facilities requiring additional pollution prevention and control measures include facilities that are incinerating municipal solid waste (not including clean wood waste) and medical waste. The materials anticipated to be incinerated at the Coral Harbour remediation site include liquid petroleum hydrocarbons, tested and compared against the criteria for incineration as prescribed in the Abandoned Military Sites Remediation Protocol, and clean wood waste. As such, it is CIRNAC CSP's opinion that requirements for stack testing do not apply to the planned remedial works.

Recommendation 2: *ECCC recommends that the Proponent test all borrow materials and indicate the types of characterization tests that will be conducted to determine ARD/ML potential before use.*

The selected contractor is currently working to develop a Quarry Operations Plan, which will be submitted to the board for review and approval prior to the commencement of borrow production activities. The plan will address the development and management of the quarries as well as reclamation activities. The site supervision consultant will develop a plan to characterize the ARD/ML potential in the borrow material and will submit it with the Quarry Operations Plan.

Recommendation 3: *ECCC recommends that the Proponent specify which "aqueous liquids" are included as hazardous waste, in order to better understand the fate and behaviour of these substances during an emergency.*

Wastes identified as "aqueous liquids" have not been fully classified and it will be a priority of the contractor and site supervision consultant to complete assessment and characterization of these wastes once they have mobilized to the site. When characterization has been completed, a review of the site specific health and safety plan, which includes the spill contingency plan and other related documents, will be completed to determine if the contents require updating based on the results of the assessment. On previously completed remediation projects of similar waste origin (military activities), aqueous contents are typically water that has pooled inside barrels in poor physical condition. These contents are tested prior to determining what treatment will be required prior to disposal.

Recommendation 4: *ECCC recommends that the Proponent provide spill response measures for a spill involving sulfuric acid.*

The Project Proposal report indicated that the volume of batteries on site was estimated to be < 10 m3 however this value is not correct and was carried incorrectly in the report from earlier assessments. The volume of batteries on the site is now anticipated to be approximately 0.1 m3. This reduction in the number of batteries to be handled on the site likewise reduces the volume of sulfuric acid as well as the risk of a spill. These batteries will be collected and placed into spill proof containers appropriate for the nature of the waste for transportation to a southern disposal facility. CIRNAC CSP agrees that if the volume of sulfuric acid was as indicated in the documents submitted with application, inclusion in the spill response plan would be a prudent suggestion. Based on the reduction in the overall potential volume of sulfuric acid, it is CIRNAC CSP's opinion that a spill response plan for the battery contents will not be required.