



Environmental Protection Operations Directorate  
Prairie & Northern Region  
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ECCC File: 6920 000 0062/00  
NWB File: 1BR-COR2325

October 29, 2024

via email at: [licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca)

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

Dear Richard Dwyer:

**RE: 1BR-COR2325 – Public Works and Government Services Canada (PWGSC) – Coral Harbour Site – Abandonment and Reclamation Plan**

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above-mentioned abandonment and reclamation plan.

ECCC provides expert information and knowledge to project assessments on subjects within the department's mandate, including climate change, air quality, water quality, biodiversity, environmental preparedness and emergencies. This work includes reviewing proponent characterization of environmental effects and proposed mitigation measures. We provide advice to decision-makers regarding a proponent's characterization of environmental effects, the efficacy of their proposed mitigation activities, and may suggest additional mitigation measures. Any comments received from ECCC in this context does not relieve the proponent of its obligations to respect all applicable federal legislation.

The following comments are provided:

**1. Topic: Mistitled document**

Reference(s):

- Abandonment and Reclamation Plan (Milestone Environmental Contracting Inc.; October 17, 2024)
- Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the Northwest Territories (Mackenzie Valley Land and Water Board/Aboriginal Affairs and Northern Development Canada; November 2013)



Comment:

The document submitted is not a plan, instead, it seems to be parts of a construction or activity summary report. It is missing basic elements that would be expected of an abandonment and reclamation plan such as criteria for soil and water quality, and monitoring. It is also missing references to documents that describe in more detail the landfarm and its operation or soil classifications. Though the site is not an advanced mineral exploration site in the NWT, the Guidelines for Closure and Reclamation (MVLWB/AANDC, 2013) provide a template of what should be included in a plan, and most of the guidance is relevant to this site.

ECCC recommendation:

ECCC recommends the Proponent clarify if the intent was to produce an Abandonment and Reclamation Plan or a construction/activity summary. If it is the former, the document should be re-written to include more detail on the proper elements, as described in the Guidelines for Closure and Reclamation (MVLWB/AANDC, 2013). If it is the later, the document should be re-titled.

**2. Topic: Camp pad encroaching on waterbody**

Reference(s):

- Abandonment and Reclamation Plan (Milestone Environmental Contracting Inc.; October 17, 2024)
  - Section 3.4.2: Camp Facility

Comment:

The document describes “*general grading of the camp area*” and the figure in Section 3.4.2 shows the camp pad on the shore and encroaching into a waterbody. It is not clear if the figure is accurate. No mention of erosion and sedimentation prevention measures or monitoring for this area was found in the report.

ECCC recommendation:

ECCC recommends the Proponent confirm if the camp pad encroaches on the adjacent waterbody and if so, describe erosion and sedimentation prevention measures for this area.

**3. Topic: Inadequate figures**

Reference(s):

- Abandonment and Reclamation Plan (Milestone Environmental Contracting Inc.; October 17, 2024)

Comment:

Figures are included in the document; annotations were made, and some images pasted onto background air/satellite photo maps. The map figures have several deficiencies:

- The figures do not have scale bars, so it is not possible to evaluate the distance between structures and work areas and waterbodies (ex. Coral Harbour Non-Hazardous Landfill and Type 3-Production Area (Green) are next to ponds, but we don't know how close.)
- The different figures are not situated relative to site or to each other and do not have coordinates or a north arrow, so it is not possible to evaluate how the different work areas might be influencing the site (ex. It is difficult to understand where Type 3-Production Area (Green) and Type 2-Production Area (Red) are relative to the rest of the site.)

ECCC recommendation:

ECCC recommends the Proponent improve map figures in their document to include scale bars and/or coordinates and locate the different maps relative to each other.

#### **4. Topic: Location of groundwater monitoring wells**

Reference(s):

- Abandonment and Reclamation Plan (Milestone Environmental Contracting Inc.; October 17, 2024)
  - Section 3.4.6 AEC 6 Land Treatment Units

Comment:

Three groundwater monitoring wells were constructed adjacent to the three temporary land treatment units (LTUs). Though a figure is provided with their location relative to the LTUs, it is not possible to determine the distance from the LTUs. The text does not describe why those locations were selected.

ECCC recommendation:

ECCC recommends the Proponent describe how the groundwater monitoring well locations were selected including any assumptions on stratigraphy on site, groundwater flow direction and potential contaminant transport.

If you need more information, please contact Maja Crawley at [maja.crawley@ec.gc.ca](mailto:maja.crawley@ec.gc.ca).

Sincerely,

Maja Crawley  
Environmental Assessment Officer

Attachment(s):

cc: Eva Walker, Head, Environmental Assessment North (NT and NU)