



Contact

P 867.873.5263
F 867.669.5555
kblenv.com

Address

10 Omilik Road
P.O. Box 92
Cambridge Bay, NU
X0B 0C0

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Licensing Department
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU
X0B 1J0

Email: licensing@nwb-oen.ca

Re: Proponent Responses to INAC and ECCC comments and recommendations from technical review of water licence application (No. 1BR-CST)- Cambridge Bay Soil and Water Treatment Facility (Kitnuna Environmental Ltd.)

Attn: Sean Joseph

Kitnuna Environmental Ltd. (KEL) is pleased to have received recommendations and comments from both Indigenous and Northern Affairs Canada (INAC) and Environment and Climate Change Canada (ECCC) regarding the proposed Soil and Water Treatment Facility (SWTF) in Cambridge Bay, Nunavut. This letter serves to act as proponent responses to the comments and recommendations brought forth by both parties.

INAC

Recommendation:

1. INAC recommends that the applicant revise the O&M Plan to include a contingency in case material accepted to the facility without characterization and later determined to be inappropriate to the facility is identified and removed in a way that does not impact water resources [...] INAC recommends that the applicant outline how they will handle such a situation.

Proponent Response:

The O&M plan has been updated to reflect how materials accepted without characterization will be handled and removed if required. Any materials requiring removal will be handled in the same manner as materials that need to be disposed of at approved offsite locations.

Recommendation;

2. INAC recommends that the applicant clarify what measures that will be taken to prevent contaminated snow from blowing away once it has been accepted into the facility, as well as how contaminated snow will be accepted during time periods when the storage pond is frozen. INAC also recommends that the O&M manual include a section on the characterization of contaminated snow if this is substantially different from the method of contaminated soil

Proponent Response:

A snow fence will be erected around the water/snow storage pond to prevent the wind blown migration of contaminated snow. When the storage pond is frozen, snow will be received by truck or loader, dumping directly into the frozen storage pond and as required an excavator will be utilized to spread the snow piles out to help avoid piles taller than necessary that have a greater chance of being affected by wind. Frequent inspections will also allow for documenting of any effects that changing winds may have, and will ensure snow is contained. The facility is designed to treat for petroleum hydrocarbons (PHC), and the only snow expected to arrive at the site is from recent/emergency spills of PHC products. The O&M plan has been updated to reflect these facts.

Recommendation:

3. INAC reminds the Applicant that any discharge of water will be required to meet NWB criteria as set in the Water License in addition to any requirements set by the Government of Nunavut. INAC also reminds the Applicant that when discharging to the environment, measures will need to be taken to prevent erosion and sedimentation into any nearby waterbodies.

Proponent Response:

KEL understands that discharge of water will be required to meet criteria as set forth by the water license and that erosion and sedimentation prevention will be required as needed. The O&M has been updated to include additional proposed discharge water criteria for the protection of aquatic life along with comments about discharge procedures and the need for erosion control.

Recommendation:

4. INAC recommends that the NWB examine the discharge criteria outlined in [...] the O&M Plan when setting water discharge criteria for the Water License.

Proponent Response:

KEL agrees that discharge water criteria in the license needs to consult government and industry standards. CCME protection of aquatic life guidelines have been added to the O&M Plan, along with Government of Nunavut guidelines, for consideration by the board.

Recommendation:

5. INAC recommends that the Applicant confirm the locations of groundwater sampling stations prior to construction and that any groundwater sampling that occurs throughout the operation of the facility be included in the Annual Report submitted to the NWB.

Proponent Response:

KEL acknowledges that groundwater sampling locations will be confirmed prior to construction, once the final location of the facility on the allotted land has been selected

through discussion internally and with the hamlet of Cambridge Bay. The locations of groundwater monitoring stations will have GPS coordinates collected once selected. All groundwater sampling that occurs will be submitted in the Annual Report.

Recommendation:

6. INAC recommends that information about the operation of the mobile water treatment plant and effluent discharge in the Closure and Reclamation Plan be moved (or duplicated in) the O&M Plan to ensure that this information is easily accessible when reviewing operations of the facility.

Proponent Response:

The information has been duplicated in the O&M Plan. Once the final design of the water treatment plant has been selected, the information can be added to an updated version of the plan.

Recommendation:

7. INAC recommends that the SCP be revised to include a description (in the main text of the plan) of the materials found on site that could lead to spills. [...]

Proponent Response:

The SCP main text has been updated to include materials that are expected to be found on site which could lead to spills.

Recommendation:

8. INAC recommends that the SCP be revised to include spill response measures for spills on ice and snow (in addition to on land and water).

Proponent Response:

The SCP has been updated to include spill response measures for spills on ice, snow, land and water.

Recommendation:

9. INAC recommends that contact information for the Manager of Field Operations (INAC) be added to the reporting section of the SCP [...]

Proponent Response:

The provided number for the Manager of Field Operations has been added in the SCP.

Recommendation:

10. INAC reminds the applicant that there will be reporting requirements in any issued Water License (to both the NWB and to INAC inspectors).

Proponent Response:

Plans have been updated to state that reporting requirements will be met as per the license with submittals to all stakeholders.

Recommendation:

11. INAC agrees that a Water License term should include the construction, operation and closure of the facility.

Proponent Response:

KEL agrees with the opinion of INAC.

ECCC

Comment:

1. The proponent must be in compliance with the *Fisheries Act* year round. Discharged water and groundwater must respect the pollution prevention provisions of the *Fisheries Act*, specifically Section 36(3) which states that “*no person shall deposit or permit the deposit of a deleterious substance of any type in water frequented by fish [...]*”.

Proponent Response:

KEL agrees with the comment and has included the statement from the *Fisheries Act* in the main body text of the O&M Plan.

Please do not hesitate to contact the undersigned if you have any questions or concerns regarding these responses or the attached facility plans.

Regards,



Josh Foster
Project Manager
Kitnuna Environmental Ltd.

Attachments:

Cambridge Bay Soil and Water Treatment Facility Operations and Maintenance Plan

Cambridge Bay Soil and Water Treatment Facility Spill Contingency Plan

Cambridge Bay Soil and Water Treatment Facility Environmental Protection Plan

Cambridge Bay Soil and Water Treatment Facility Emergency Response Plan

Cambridge Bay Soil and Water Treatment Facility Waste Management Plan

Cambridge Bay Soil and Water Treatment Facility Closure and Reclamation Plan