



Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

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NWB5EKA
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July 23, 2004

Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0E 1J0

Via electronic mail to:
licensing@nwb.nunavut.ca

Re: NWB5EKA - FOX-C DEW Line Project

On behalf of Indian and Northern Affairs Canada Water Resources (INAC Waters), I would like to thank the Nunavut Water Board (NWB) for the opportunity to provide comment on the FOX-C DEW Line clean-up Water License Application (the Application) submitted by the INAC Northern Affairs Program (the Proponent).

INAC Waters is in support of the Proponent's Application, and is of the opinion that the activities described therein represent a positive step in restoring the environmental integrity of Ekalugad Fjord. The following comments and recommendations are offered with respect to this Application :

Water License Application Form - Section 15

The Proponent has indicated that the current Application is for a single year project only, with subsequent undertakings to be captured under future Water License applications. In the Section 32 of the Exploration/Remote Camp Supplementary Questionnaire, however, the Proponent has noted that waste generated in 2004, possibly including non-combustible solid wastes, waste oils and/or hazardous waste, and scrap metal, will be left onsite at the end of 2004. This material is anticipated to be removed in future program years. While INAC Waters does not oppose the safe and environmentally sound storage of material onsite, the associated liability under a 2004 Water License should not be released until such time as 2004 waste is removed site.

Exploration/Remote Camp Supplementary Questionnaire - Section 23

The Proponent has indicated that an enhanced "Fuel Enhancement and Spill Contingency Plan" will be provided once a contractor is selected. Regardless of the origin, it is the responsibility of the Proponent to ensure that an adequate Spill Contingency Plan is submitted to the NWB. The Spill Contingency Plan, as submitted with the Application, is inadequate. The following additions to the Spill Contingency Plan are recommended:

- a. All phone numbers currently absent from the Table 1 Contact List.
- b. The name, address, and title of the person in charge in the event of a spill.
- c. The name, job title, and 24 h contact information of the person onsite responsible in the event of a spill.
- d. A description of the spills training all onsite personnel will receive in advance of any potential spill occurrences. At present the need for training has been identified only following the discovery of a spill (Section 1.2.5).
- e. At present the actual clean-up of spilled material is absent from the spill contingency framework. It is suggested that this step could be included in Section 1.2.5.10, to read "...guidelines for spill clean-up and the disposal of spill materials".
- f. The spill contingency plan described in Section 1.1.2 of the submitted Spill Contingency Plan could also be submitted to the NWB in addition to onsite posting.

Work Plan - Section 4.3.2

The Proponent has indicated that lake bed sediments will be sampled for PCB, hydrocarbon, and metals analysis. It is anticipated that the sediment sampling regime will target sites where high contaminant concentrations are anticipated. As the resuspension of contaminated sediments will increase both contaminant bioavailability and mobility, it is critical that every effort be made to minimize sediment disruption. INAC Waters therefore suggests that the Proponent provide the NWB with a description of sediment sampling protocol.

Please do not hesitate to contact me if there are any questions or concerns.

Best regards,

Original signed by:

Stephanie Hawkins
Qikiqtani Regional Coordinator
Water Resources
Phone: (867) 975-4555
Fax: (867) 975-4585
Email: hawkinss@inac-ainc.gc.ca