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Your file - Votre référence
1BR-EKA

Our file - Notre référence
#90127 / 9545-3-5EKAG

June 27, 2006

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Via Email

**Re: 1BR-EKA - Indian and Northern Affairs Canada - Ekalugad Fjord
Project - 2005 Annual Report**

On behalf of Indian and Northern Affairs Canada (INAC) I have reviewed the above-mentioned application. The following specialist advice has been provided pursuant to INAC's mandated responsibilities for the enforcement of the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* (NW&NSRT), *Arctic Waters Pollution Prevention Act* (AWPPA), and the *Department of Indian Affairs and Northern Development Act* (DIAND Act).

Indian and Northern Affairs Canada has submitted a copy of its 2005 Annual Report for the Ekalugad Fjord Project. This report was prepared by Qikiqtaaluk Corporation who is implementing this project and holds the required licence on behalf of INAC. The Ekalugad Fjord Project entails the clean-up and remediation of the former FOX-C Intermediate DEW-Line Site on Baffin Island. Ekalugad Fjord is situated on the east coast of Baffin Island, approximately 195 km south of Clyde River (has a coordinate of 68°42'N, 68°33'W). Clean-up efforts are needed to properly dispose of PCB and metal contaminated soils, dump sites, materials contaminated with PCB amended paint and Asbestos, and scattered fuel drums and tanks. Site remediation is scheduled to commence in 2006 and be complete by 2007.

The proponent consumed 10 m³ of freshwater for domestic purposes in its 2005 project season. The resulting gray water and unused water was discharged onto land in an area greater than 100 m from any water body. Approximately 0.3 metric tonnes of solid waste were generated by project personnel. Combustible wastes were incinerated on site.

Provided in the 2005 Annual Report is a copy of the project's Spill Contingency Plan. This Plan lists the types and volumes of hazardous materials that will be used to support project activities, their Material Safety Data Sheets, spill response measures, and a summary of spill response equipment. Hazardous material spills will be reported to the Environment Canada 24-hour Spill Response Line at (867) 920-8130.

INAC Comments

INAC recommends that the following comments be taken into consideration when reviewing this project submission.

SPILL CONTINGENCY / HAZARDOUS MATERIALS

- All fuel caches shall be located above the high water mark of any water body. Furthermore, INAC recommends the use of secondary containment, such as self-supporting insta-berms, when storing barreled fuel on location rather than relying on natural depressions.
- The proponent shall ensure that any hazardous materials, including waste oil, receive proper treatment and disposal at an approved treatment facility.
- INAC recommends the use of spill prevention measures, such as the use of spill trays, when refueling project equipment.
- INAC recommends that the Spill Contingency Plan be revised to include the contact information of key on-site personnel responsible for implementing spill response measures. This information is needed to provide a 24-hour contact for authorities investigating a spill.
- INAC recommends that the Spill Contingency Plan include a copy of the form used to document hazardous material spills through Environment Canada's 24-hour Spill Report Line. This form is accessible on the ftp.nunavut.ca website should be faxed to (867) 873-6924.
- Section 8 of the Spill Contingency Plan, Reporting Requirements, should be revised to include INAC's Water Resources Enforcement Officer, Patrick Larocque. Larocque can be contacted by office telephone at 975-4289.

Indian and Northern Affairs Canada requests notification of any changes in the proposed project, as further review may be necessary. Please do not hesitate to contact me if you have any questions or comments with regards to the foregoing by telephone (867) 975-4555 or by email via abernethyd@inac-ainc.gc.ca.

Sincerely,

Original signed

David W. Abernethy
Water Resources Coordinator

cc. Jim Rogers - Manager of Water Resources, Indian and Northern Affairs Canada, Iqaluit