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Department of Environment

Ministère de l'Environnement

Feb. 14, 06

Richard Dwyer
Licensing Trainee
Nunavut Water Board

via Email to: licensing@nwb.nunavut.ca

**RE: 1BRFOD - DEFENSE CONSTRUCTION CANADA FOX-3 DEW LINE SITE
CLEANUP WATER LICENSE APPLICATION**

Dear Richard:

The Department of Environment (DOE) has reviewed the water license application from Defense Construction Canada for conducting a DEW Line Site cleanup at the FOX-3 site near Dewar Lakes, and has the following comments and recommendations.

1. SPILL CONTINGENCY PLAN:

Based on the Government of Nunavut *Spill Contingency Planning and Reporting Regulations* and *A Guide to the Spill Contingency Planning and Reporting Regulations*, the DOE has the following comments to make:

- In addition to a site map, a description of the site and the associated facility including the location, size and storage capacity is required as this is important for people who are unfamiliar with the area.
- The DOE, Environmental Protection Service (EPS) monitors the movement of hazardous wastes, from generators, carriers to receivers, through a tracking document (Waste Manifest). A Waste Manifest must accompany all movements, and all parties must register with the EPS. There is no mention of this procedure in the spill plan.

2. ABANDONMENT & RESTORATION PLAN

An Abandonment & Restoration (A&R) Plan is required to be submitted along with other documents; however, there is no mention of a detailed plan in the application. Based on the DOE's *Environmental Guideline for Site Remediation*, the plan should be elaborated to include the following details: site description,

contact information, the disposal and the removal of fuel/chemicals, the disposal of contaminated wastes and camp garbage, and finally the restoration of the project site and the camp site.

3. WILDLIFE

The FOX-3 DEW Line Site situates at the edge of Dewar Calving Area, and there will be potential caribou calving activities near the project site. The DOE recommends the proponent to follow instructions below if calving activities are observed.

The period between May 15 and July 15 is the normal caribou calving season. The applicant is advised to suspend all operations, particularly blasting, overflights by aircraft at any altitude of less than 300 meters above ground level, and the use of snowmobiles and ATV's (all-terrain vehicles) outside the immediate vicinity of the camp. In addition, all personnel should remain quietly in the camp when caribou are in the area.

We thank NWB for giving us the opportunity to review and provide comments on the Defense Construction Canada's water license application near Dewar Lakes. Please contact me if you have any further questions or comments.

Yours sincerely,

Original signed by

Helen Yeh
Environmental Assessment Coordinator
Environmental Protection Service
Department of Environment
Government of Nunavut
P.O. Box 1000, Stn. 1360
Iqaluit, Nu X0A 0H0
PH: (867) 975-7733
FX: (867) 975-7739
EM: hyeh@gov.nu.ca