

From: [Sean Joseph](#)
To: Robert.Bellizzi@dcc-cdc.gc.ca
Cc: [Phyllis Beaulieu](#)
Subject: RE: DEW line permit questions: 1BR-FOD0813, FOX-3, Dewar Lakes
Date: Thursday, August 26, 2010 3:39:48 PM

Dear Mr. Bellizzi:

Sorry for not responding to your questions sooner.

Please see the following responses to questions.

FOX-3: River Sampling

If, based on observations and water analysis results, it appears that no useful information is being derived from the sampling program instituted at the Macbeth River monitoring stations, FOD-10 and FOD-11, then DCC can submit an amendment request for the NWB to consider. Please note, however, that all terms and conditions, including the ones contained in an amendment request, must be complied with up to and until the issuance of an amendment.

With respect to the inspection conducted by INAC, I have not seen the inspection report; however, it advised that DCC follow all recommendations made by the inspector as they relate to the terms and conditions of the licence. Pursuant to section 87 (1) of the Nunavut Water and Nunavut Surface Right Tribunal Act, an inspector can request a licensee to conduct additional analyses, which the inspector believes are reasonable.

FOX-3: incinerator

On the question of incinerator ash, the NWB generally does not ask licensee to conduct toxicity tests on incinerator ash generated from combusting non-hazardous materials. Based on the licence, the condition of determining toxicity of incinerator ash in accordance with the Transportation of Dangerous Goods (TDG) Act, appears to have been articulated by the licensee during the application process and was therefore included in the licence. Consequently, parameters and limits for test results were not included in the licence. Furthermore, reference made to the TDG Act for determining toxicity does not seem to be correct. The TDG Act applies once toxicity is determined and transportation of the respective material is being carried out. Since the aforementioned issue is mostly related to particulate residuals that may or may not be hazardous, Environment Canada has been asked to provide guidance on this matter. Once a response is received, it will be provided accordingly. In the mean, however, if you also want the NWB to consider an amendment for this condition, do submit a request.

Should you have any questions or concerns in the interim, please do not hesitate to contact me.

Best Regards,

Sean B. Joseph
Technical Advisor
Nunavut Water Board
Phone: 867-360-6338 Ext. 25
Fax: 867-360-6369
Email: sjoseph@nunavutwaterboard.org

-----Original Message-----

From: Bellizzi, Robert [<mailto:Robert.Bellizzi@dcc-cdc.gc.ca>]
Sent: Friday, August 13, 2010 9:18 AM
To: sjoseph@nunavutwaterboard.org
Cc: Phyllis Beaulieu; Andrew Keim; Eva.Schulz@aec.com; Katherine.White@rmc.ca
Subject: DEW line permit questions: 1BR-FOD0813, FOX-3, Dewar Lakes

Hello Mr. Joseph:

My predecessor as Environment Officer for the DEW Line Clean Up Project, Doug Craig, requested clarification on a few points as they relate to WUL permit for FOX-3. Since May 7, 2010 we have not received clarification on these questions.

In the meantime, INAC conducted a water use license inspection at FOX-3 (1BR-FOD0813) on July 31, 2010 and raised the same questions we requested clarification on in May with regards to the permit issued by the Water Board. The following require clarification from the water board.

FOX-3: River Sampling

- According to the WUL, we are required to sample and test river samples upriver and downriver of an old landfill closest to the river. We would strongly suggest that this act of 'monitoring' is not useful given the large volume of water moving in the Macbeth River.
- Moreover, INAC inspector requested the institution of different 'monitoring' program including a TSS program on the Macbeth River.

DEW Line clean up project would like to note:

- We have noticed over the years working on DEW Line site that visual monitoring is just as effective, if not more so, compared to a TSS program. We can take photographs of the desired locations prior to work commencing and during work events.
- If there are additional locations to be added for 'monitoring' along the river, these additional sites must be directed by the NWB. For your reference, no other DEW Line sites that we have worked on requested river sampling in their respective Water Use Licenses.
- If additional sampling or analysis is to be required for FOX-3, including a TSS program, we defer to the NWB for direction.
- We have noticed that the mitigation measures employed along the Macbeth River have been effective in reducing sedimentation during construction activities. We hold a log of mitigation measures employed, identifying when the contractor puts the measure in place and their effectiveness.

FOX-3: incinerator

The site is required to operate forced air, fuel fired incinerators for all kitchen wastes and combustible non-hazardous material (cardboard, paper, etc.). The ash from the incineration process has always been landfilled on-site. These two permits have special conditions. First, is that the ash must be tested for leachate toxicity in accordance with the Transportation of Dangerous Goods Act. Please specify which leachate test is required, and for which parameters. Since this is domestic waste, one would not expect any significant levels of toxic metals, so we would expect that the list would be short. The second condition is that the ash, if it is to be disposed onsite, is to go into the Tier II landfill. This is not a problem. We require confirmation of acceptability on this process from the NWB.

Thanks for acknowledging receipt and for confirming NWB direction.

Many thanks, and I look forward to hearing from you regarding these

issues.

Regards,

Robert Bellizzi
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-----Original Message-----

From: Sean Joseph [<mailto:sjoseph@nunavutwaterboard.org>]
Sent: Wednesday, 5, May, 2010 13:56 PM
To: Craig D@CAS D Air Prog@Ottawa-Hull
Subject: RE: DEW line permit questions

Good morning Douglas,

Thanks for the follow up and sorry for not getting by to you sooner. I respond to your questions by Friday, May 7, 2010.

Regards,

Sean

-----Original Message-----

From: DOUGLAS.CRAIG@forces.gc.ca [<mailto:DOUGLAS.CRAIG@forces.gc.ca>]
Sent: Wednesday, May 05, 2010 6:33 AM
To: sjoseph@nunavutwaterboard.org
Subject: RE: DEW line permit questions

Good morning Sean,

Please acknowledge that you received the email.
Many thanks.

Douglas