



Nunavut Regional Office
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Your file - Votre référence
NWB5FOX
Our file - Notre référence

July 6, 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: NWB5FOX - Re-packaging of PCB amended painted materials

On behalf of Indian and Northern Affairs Canada (INAC), I would like to thank the Nunavut Water Board (NWB) for the opportunity to provide comment on the application of Defense Construction Canada (the Proponent) for a Water License to encompass the re-packaging of PCB amended painted materials.

Although INAC does not oppose the activities or water use proposed by the Proponent, the following comments and recommendations are offered with respect to this application:

1. There is a discrepancy in the application for the period of the Water License requested. Section 15 of the Water License Application form provides for multiple year activity, with an October, 2005, completion date. In contrast, Section 5 of the Exploration/Remote Camp Supplementary Questionnaire identifies the activities as annual, with an October, 2004, completion date. It is recommended that the Proponent clarify the duration of Water License requested.
2. The Proponent has not described the proposed re-packaging activities in any section of the application. Lacking this information, it is impossible to ascertain if, and to what degree, these activities may or may not pose a risk of release of PCB amended materials into the surrounding environment.
3. The Spill Contingency Plan requires the following additions and/or modifications:
 - a. The name, address, and title of the person in charge in the event of a spill.
 - b. The name, job title, and 24 h contact information of the person onsite responsible in the event of a spill.

- c. 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 1.5.1).
- d. 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 1.10, to read "...guidelines for spill clean-up and the disposal of spill materials".

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

Best regards,

Original signed by:

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