



National Defence

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Ottawa, ON K1A 0K2

18 October 2017

INAC File: CIDM #1173899
NWB File: 1BR-FRA1016

Via email to: richard.dwyer@nwb-oen.ca

Richard Dwyer
Licence Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0

Re: Response to INAC's Letter Dated September 11, 2017, Titled "Indigenous and Northern Affairs Technical Review of PIN-3 Lady Franklin Point Monitoring Program – Department of National Defence – Type 'B' Water Licence Renewal 1BR-FRA1016"

Dear Mr. Dwyer,

DND has reviewed the above-referenced letter and is submitting this letter in response to the recommendations provided therein. For consistency, DND has followed the naming convention of the section headers in the INAC letter.

A.1. Applying For A Renewal Licence 2017

INAC Recommendation:

INAC recommends that in the future the licensee apply for a licence renewal well in advance to avoid the expiry of their water licence before a renewal is in place.

DND Response:

DND's current licence renewal schedule is based on the schedule of monitoring events. PIN-3 was last monitored in 2014 and the next monitoring event is not planned until 2019. No other on-site activities are foreseen in the interim. This renewal was intended to be finalized well in advance of the 2019 monitoring event. DND will revisit the water use licence renewal schedule to ensure licences do not lapse, even in the absence of on-site activities.

We understand that the expiry of the licence does not relieve DND from any obligations imposed by the licence.

Canada 

A.2. Annual Reports

INAC Recommendation:

INAC recommends that the Licencee clarify which sections of the single annual report for all DND DEW Line sites apply to water licence 1BR-FRA1016.

DND Response:

DND does not submit a single annual report for all of its DEW Line sites. As indicated in Section 26 of the application to renew water licence 1BR-FRA1016, DND submits to NWB all annual monitoring reports generated by the monitoring contractors for sites visited in a given year. For example, the complete 2014 monitoring report for PIN-3 can be found here on the NWB Public Registry:

[http://www.nwb-oen.ca/public/registry/1%20INDUSTRIAL/1B/1BR%20-%20Remediation/1BR-FRA1016%20PIN%203%20DCC/3%20TECH/10%20MONITORING%20\(J\)/160215%201BR-FRA1016%20PIN%203%20LFM%20Report%202014-ILAE.pdf](http://www.nwb-oen.ca/public/registry/1%20INDUSTRIAL/1B/1BR%20-%20Remediation/1BR-FRA1016%20PIN%203%20DCC/3%20TECH/10%20MONITORING%20(J)/160215%201BR-FRA1016%20PIN%203%20LFM%20Report%202014-ILAE.pdf)

The site-specific reports are accompanied by a single cover letter that includes a summary table. Each line item in the table corresponds to the NWB reporting template. The column headers in the table list all fifteen (15) DND DEW Line sites in Nunavut (refer to Section 26 of the application to renew water licence 1BR-FRA1016).

INAC Recommendation:

The annual report should contain a list of hazardous material stored on site.

DND Response:

Monitoring consultants typically bring small quantities of fuel (205 L or less) to the DEW Line sites; all remaining fuel and containers are removed at the end of each field program. Please refer to the PIN-3 spill contingency plan on the NWB Public Registry:

<http://www.nwb-oen.ca/public/registry/1%20INDUSTRIAL/1B/1BR%20-%20Remediation/1BR-FRA1016%20PIN%203%20DCC/1%20APPLICATION/2017%20Renewal/170713%201BR-FRA1016%20Spill%20Contingency%20Plan%20PIN%203-IAAE.pdf>

A.3. Water Use

INAC Recommendation:

The Licencee has applied for water use associated with sampling, however they have indicated that they will have a temporary camp for one week.

DND Response:

Please refer to Section 26 of the NWB Exploration/Remote Camp Supplementary Questionnaire on the NWB Public Registry (bottled water will be brought to site for drinking water purposes):

<http://www.nwb-oen.ca/public/registry/1%20INDUSTRIAL/1B/1BR%20-%20Remediation/1BR-FRA1016%20PIN%203%20DCC/1%20APPLICATION/2017%20Renewal/170713%201BR-FRA1016%20NWB%20Remote%20Camp%20Questionnaire%20PIN%203-IAAE.pdf>

If further clarification is required, please do not hesitate to contact me at (613) 995-8603 or Alison.Street@forces.gc.ca or the DND DEW Line Senior Project Manager Laura D'Costa at (613) 943-7852 or Laura.DCosta@forces.gc.ca.

Regards,



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Environmental Specialist, DEW Line Clean-Up and Long Term Monitoring, DND

cc: Karén Kharatyan, Acting Manager of Licensing, Nunavut Water Board
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