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RE: NIRB 03DN003 – Defense Construction Canada - Dew Line Site Clean-up, Gladman Point, NU

Our file: 4517 000 001

On behalf of Environment Canada (EC), I have reviewed the information submitted with the above-mentioned application. The following specialist advice has been provided pursuant to Environment Canada's mandated responsibilities for the enforcement of the *Canadian Environmental Protection Act*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

UMA Engineering Ltd., on behalf on Defense Construction Canada, is proposing to conduct a clean up of the former CAM-2 Gladman Point Dew Line Site. Gladman Point is located on King William Island, NU, near McClintock Bay and Simpson Straight. This project is part of the larger Department of National Defence project to decommission and reclaim the Distant Early Warning System sites. This clean up includes the remediation of chemically contaminated soils, the stabilization of landfill areas, the excavation of the Airstrip landfill due to its close proximity to water, the creation of a non-hazardous and a hazardous material landfill, the creation of a landfarm of contaminated soils, and the demolition/disposal of surplus infrastructure and debris. A monitoring program will be carried out after the clean up has been completed. The proponent is applying for a land use permit, a quarrying permit and a water licence.

Environment Canada recommends that the following conditions be applied throughout all phases of the project:

- The proponent shall not deposit, nor permit the deposit of any fuel, chemicals, wastes or sediment into any water body. According to the Fisheries Act, Section 36(3), the deposition of deleterious substances of any type in water frequented by fish, or in any place under any conditions where the deleterious substance, or any other deleterious substance that results from the deposit of the deleterious substance, may enter any such water, is prohibited.
- The proponent shall not deposit nor permit the deposit of sediment into any water body. The ecological balance of fish and plants in rivers and lakes can easily be upset by sedimentation or blockage from quarrying. A minimum undisturbed buffer zone of one hundred metres (100) shall be maintained between the proposed quarry operation and the high water mark of any definable watercourse as identified on a 1:50,000 NTS map.
- All sumps shall be located above the high water mark of any waterbody and in such a manner as to prevent the contents from entering any waterbody frequented by fish.

- Further, all sumps shall be backfilled and restored at the end of each season to prevent the contents from entering any waterbody.
- The placement and capping of landfill sites must be carried out such that erosion will not occur.
- The *Species at Risk* Act was not identified as an applicable legislation in the application. Environment Canada would like to inform the proponent that the *Species at Risk Act* was proclaimed into force this year, and that this project is subject to this legislation.
- All spill basins and fuel caches should be located above the high water mark of any
 waterbody and in such a manner that the contents do not enter any waterbody.
- Environment Canada recommends that any holes created through the removal of creosite coated power poles and foundations be capped off with fill and regraded to match the contours of the land.
- Environment Canada recommends the use of an approved incinerator for disposal of camp wastes.
- Drip pans or absorbent materials should be used when refuelling equipment on site.
- The proponent neglected to identify the NWT Spill Line as the appropriate number to contact in the event of any spill. All spills are to be documented and reported to the NWT Spill Line at (867) 920-8130.
- The proponent shall ensure that all hazardous waste and waterwater not being disposed
 of in the Tier II Landfill receive treatment at an appropriate disposal facility. This
 includes any hazardous waterwater from the Airstrip Landfill found to be over the Tier II
 limits.
- The proponent has provided detailed information regarding the classification of wastes under the Transportation of Dangerous Goods Act. Environment Canada would like to notify the proponent that the new Clear Language Regulation has come into effect and the changes to the waste classification system detailed therein must be followed.

Please do not hesitate to contact me with any questions or comments with regards to the foregoing at (867) 975-4639 or by email at colette.meloche@ec.gc.ca.

Yours truly,

cc:

Colette Meloche Environmental Assessment Specialist

(Mike Fournier, Northern Environmental Assessment Coordinator, Environment Canada, Yellowknife)