



Environment Canada **Environnement Canada**

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Via Email

**RE: NWB5GLA – Defence Construction Canada – CAM-2 DEW Line, Gladman Point
– Abandonment and Restoration Plan**

On behalf of Environment Canada (EC), I have reviewed 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. has submitted an Abandonment and Restoration (A&R) Plan for the former CAM-2 Gladman Point DEW Line site on behalf of Defence Construction Canada (DCC) to fulfill its Part I licence requirement. This Plan provides a brief summary of the various closure activities and monitoring requirements that will be practiced in the reclamation of this site. In particular, closure activities are planned for areas of demolition work, areas of contaminated soil excavation, the land-farm facility, the non-hazardous waste landfill, the tier II soil disposal facility, and the demobilization of project equipment, supplies, and wastes. The CAM-2 DEW Line site is located on the south coast of King William Island, approximately 75 km west of the community of Gjoa Haven and 300 km east of Cambridge Bay, having a coordinate of 68°45'N, 81°11'W.

The A&R Plan makes reference to the licence Monitoring Plan submitted in March 2005 which addresses post-closure landfill monitoring requirements. Landfill monitoring will be implemented in accordance with the DEW Line Clean-up Environmental Provisions established in the DND/NTI Cooperation Agreement. The Monitoring Plan provides standards for the monitoring of soil, groundwater, and thermal data in the construction and post-construction phases of the CAM-4 site clean-up. The Plan's detailed monitoring requirements section outlines the functions of each landfill, the types of landfill monitoring stations and their locations (e.g., soil and ground water monitoring wells and thermistors), and the frequency and parameters that will be used for monitoring the evaluation components.

Environment Canada recommends that the project's A&R Plan indicate that areas excavated of contaminated soil will follow the project's Monitoring Plan. The Plan states that the west landfill's northern and southern sites, and the station landfill will receive periodic visual and soil sampling analysis after being filled with granular material and contoured to match the surrounding landscape.



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Environment Canada recommends that the Monitoring Plan be revised to include any monitoring of the project's landfarm. The Monitoring Plan does not make any reference to the operation of a landfarm. If the landfarm is still operational, Environment Canada recommends that the Monitoring Plan be modified to include the monitoring of hydrocarbons in the groundwater [total petroleum hydrocarbons (TPH)] and the soil [TPH fractions F1 – F3]. The location of monitoring locations should be indicated on a map. Once remediation objectives are met and the landfarm is closed, further monitoring will not be needed.

If there are any changes in the proposed project, EC should be notified, as further review may be necessary. Please do not hesitate to contact me if you have any questions or comments with regards to the foregoing at (867) 975-4631 or by email via david.abernethy@ec.gc.ca.

Sincerely,

David W. Abernethy
Environmental Assessment Technician

CC. Colette Spagnuolo – Environmental Assessment / Contaminated Sites Specialist, Environment Canada, Iqaluit