



Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence

NWB5LON

Our file - Notre référence

June 6, 2003

Phyllis Beaulieu
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0E 1J0

Sent by email to:

nwblic@polarnet.ca

Comments on Fox-2 Longstaff Bluff DEW Line Site Clean UP Project Water Licence Application

On behalf of Indian and Northern Affairs Canada (INAC), I am pleased to present the following comments on the application for a water licence by Defence Construction Canada (DCC) for the clean up of the Fox-2 Longstaff Bluff DEW Line Site.

This application is only for a short-term project dealing with the clean up of hydrocarbon-contaminated soils located near the shoreline. The work consists of excavating approximately 1600 m³ of soil, which will be placed into the existing bermed POL tank area. The hydrocarbon-contaminated soils are to remain in that area until the full clean-up of the site, schedule for a future date.

The excavation work that will take place is situated at the marine shore. There are no freshwater streams or lakes in the area of work, and thus it does not appear that fresh water will be affected by the excavation. INAC therefore believes that the excavation aspect of the project does not require a water licence. INAC does, however, recommend that the proponent contact the Department of Fisheries and Oceans to provide information on possible impacts to the marine foreshore area and seek their comments on recommended mitigation measures.

As for the temporary storage of the contaminated soils, INAC recommends that monitoring be included around the area to verify that no hydrocarbons are leaching into the environment or nearby waters. Alternatively, the proponent could provide the results of a leachate test proving that the hydrocarbon leaching will not be a problem for this particular batch of hydrocarbon-contaminated soils.

The camp aspect of the work will be using bottled water for their drinking water. However, the clean-up aspect itself will require approximately 1.5 m³ of water per day. INAC recommends that the water licence allow for the use of water to the amount of 1.5 m³/day for clean-up (industrial) purposes.

With respect to the camp for the contractors performing the work, INAC recommends the following conditions be included in the water licence:

- All waste disposal areas, sewage treatment facilities, grey water sumps, and fuel caches should be located a minimum of 30 metres from the normal high water mark of any water body, and be sufficiently bermed or otherwise contained to ensure that deleterious substances do not enter any water bodies.
- All sumps should be backfilled and properly restored prior to leaving the site.
- All combustible garbage should be burned daily. All noncombustible garbage should be stored/disposed of in an approved disposal site.
- Hazardous waste, such as petroleum or batteries, should be segregated from the normal waste and stored/disposed of in an appropriate manner. The most appropriate method is likely the shipment of the hazardous waste off-site.
- The camp should have a spill contingency plan as well as an abandonment and restoration plan for the final closure of the camp. These plans should include provisions for the water treatment and waste disposal facilities, if applicable.
- All spills of oil, fuel, or other deleterious materials should be immediately reported to the 24-Hour Spill Line at (867) 920-8130. The spill should also be reported to INAC's Water Resource Officer at (867) 975-4298, and a report should be provided with the follow-up measures taken to remediate the spill.

Finally, the above comments regard the current application proposal for the shoreline clean up. When the application for the entire Fox-2 DEW Line Site clean up is submitted, INAC will provide additional comments for the other aspects of this project.

If you have any concerns or questions, please feel free to contact me.

Sincerely,

Original Signed By: Michael Roy

Michael Roy
Qikiqtani Regional Coordinator, Water Resources
INAC - Nunavut Regional Office
P.O. Box 100, Iqaluit, NU, X0A 0H0
(867) 975-4555
fax: (867) 975-4276
roymjp@inac-ainc.gc.ca