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Via Facsimile licensing @nwb.nunavut.ca

RE: NWB5LON – Defence Construction Canada – FOX-2 Longstaff Bluff DEW Line Clean-up Amendment

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*.

Defence Construction Canada, on behalf of the Department of National Defence, has applied for an amendment to their current water license in order to conduct a site investigation at the FOX-2 DEW Line site. A temporary camp will be established to support the work.

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

- o 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.
- Environment Canada recommends the use of an approved incinerator for the disposal of combustible camp wastes.
- All sumps for the disposal of camp grey water 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 upon completion of the project and contoured to match the surrounding landscape.
- The Site Investigation Activities report submitted with the application indicates that residual wastes from incineration will be buried on site. As the location of the non-hazardous waste landfill has not yet been determined, EC requests clarification regarding where this waste will be buried on site. Environment Canada recommends that this material be stockpiled in a secure area until the non-hazardous waste landfill is constructed.
- The application does not make reference to the type or quantity of fuel required for this undertaking. Environment Canada requests that this information be submitted as soon as it is available. All fuel caches 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. Environment Canada recommends the use of self-supporting instaberms for the storage of fuel on site.
- The application indicates that excess fuels and laboratory wastes will be packaged and stored in an on-site building for disposal during the full scale clean-up activities for the site. The proponent shall ensure that these materials are properly and securely stored during the interim period according to all applicable regulations.
- o The proponent shall not store materials on the surface ice of lakes or streams.
- The application provides information regarding spill contingency planning. While this information is a good start to the development of a spill contingency plan, a spill contingency plan should be a stand-alone document that is available on site. The plan should provide a clear path of response in the event of a spill and provide contact information for key personel that should be notified in the event of a spill. Further, the stand-alone plan should include a site map detailing the location of fuel caches and spill kits available on site. The plan should also include contact information and a list of spill response equipment available for use at other locations that can be accessed if required. The plan should also clearly indicate that <u>all spills</u> are to be documented and reported to the 24 hour Spill Line at (867) 920-8130.

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 with any questions or comments with regards to the foregoing at (867) 975-4639 or by email at colette.spagnuolo@ec.gc.ca.

Yours truly,

Original signed by

Colette Spagnuolo Environmental Assessment / Contaminated Sites Specialist

cc: (Stephen Harbicht, Head, Assessment and Monitoring, Environment Canada, Yellowknife)

