



Environment Environnement
Canada Canada

Environmental Protection Branch
Qimugjuk Building 969
P.O. Box 1870
Iqaluit, NU X0A 0H0
Tel: (867) 975-4631
Fax: (867) 975-4645

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Our file: 4517 000 024
NWB file: 1BR-LON0813

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU
X0A 1J0

Via email: licensing@nunavutwaterboard.org

RE: 1BR-LON0813 – FOX-2 Longstaff Bluff DEW Line Site Operation and Maintenance Plan

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 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./AECOM Canada Ltd. has submitted an Operation and Maintenance Plan (Plan) for the FOX-2 Longstaff Bluff DEW Line Site, as part of Water License 1BR-LON0813, issued by the Nunavut Water Board. The FOX-2 DEW Line site is owned by the Department of National Defence and is located at 68°38'99"N 71°13'76"W. Site activities include the clean up of physical debris and/or contaminated soils, construction of new landfills, and remediation of existing landfills.

Upon review of the Plan, EC provides the following comments and recommendations for the Nunavut Water Board's consideration:

- The Plan states that garbage will be incinerated. Please note that EC has developed a Technical Document for Batch Waste Incineration, and is available at the following web link:
<http://www.ec.gc.ca/drgd-wrmd/default.asp?lang=En&n=82401EC7-1>
The technical document provides information on appropriate incineration technologies, best management and operational practices, monitoring and reporting.
- The Plan should include provisions for dealing with any accumulations of solids or sludges that may occur along the flow path, and how accumulated sludges in the lagoons will be removed, if needed.
- All landfills shall be located and capped in such a manner as to prevent erosion from occurring. Further, all landfills shall be located above the high water mark of any waterbody and in such a manner as to prevent the contents and/or any runoff from entering any waterbody frequented by fish.
- Environment Canada recommends that all potential products that are attractants to wildlife be made inaccessible to wildlife at all times. Camp waste can attract predators of migratory birds (e.g., foxes and ravens) to an area if not disposed of properly.

- Environment Canada recommends that if it is necessary to excavate contaminated soils in close proximity to a water body, measures be taken to ensure that sedimentation of the waterway does not occur. This could include the use of silt curtains, silt fences, or other such preventative measures.
- Environment Canada recommends that the proponent ensure that bulky scrap materials, generated from the clean up of site debris, deposited in the municipal landfill do not result in void spaces in the landfill. Bulky materials should be segregated from the rest of the domestic waste.
- Once known, the Plan should be updated with information for the Emergency Response Contact List (Appendix B, 18.5 and 18.6).
- The Plan should contain information the time of year when structure demolition will occur, and how to proceed when active migratory bird nests are found during the demolition of structures in reclamation areas.
- Section 6 (a) of the *Migratory Birds Regulations* states that no one shall disturb or destroy the nests or eggs of migratory birds. In order to minimize the risk of accidentally disturbing or destroying nests or eggs of migratory birds during demolition or remediation activities, Environment Canada recommends the following mitigation measures for migratory birds:
 - Remediation work in known nesting areas should be undertaken either before or after the nesting season. Structures with known nests should be taken down either before or after the nesting season.
 - If other demolition or remediation work occurs during the nesting season, these areas should be inspected for active nests before any demolition or remediation work starts.

Previous comments and recommendations submitted by Environment Canada relating to the FOX-2 Longstaff Bluff site would still apply. 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) 975-4631 or by email at Paula.C.Smith@ec.gc.ca

Yours truly,

Original signed by

Paula C. Smith
Environmental Assessment Coordinator
Environmental Assessment – North
Environmental Protection Operations

cc: Carey Ogilvie (Head, EA-North, EPO, Yellowknife, NT)
Ron Bujold (Environmental Assessment Technician, EPO, Yellowknife, NT)
Mirey Lopez (Contaminated Sites Officer, Environment Canada, Calgary, AB)

References

CCME. 1999. Canadian Water Quality Guidelines for the Protection of Aquatic Life. Retrieved from <http://www.ccme.ca/publications/>.