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NUNAVUT WATER BOARD  
NUNAVUT IMALIRIYIN KATIMAYINGI  
OFFICE DES EAUX DU NUNAVUT

File: **1BR-LON0813/TR/B1, H2, E2, J16**

October 12, 2010

Eva Schulz, P. Ag.  
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**Subject: Licence No. 1BR-LON0813, “FOX-2, Longstaff Bluff DEW Line Site, Qikiqtani Region, Nunavut” – Defence Construction Canada; Submission of the 2009 Annual Report under Part B, Item 1; Spill Contingency Plan under Part H, Item 2; Operation and Maintenance Plan under Part E, Item 2; and Post-Construction Monitoring Program under Part J, Item 16.**

Dear Ms. Schulz:

The Nunavut Water Board (“NWB”) has completed a technical review of the 2009 Annual Report, received on April 13, 2010, and of a Spill Contingency Plan, Operation and Maintenance Plan and Post Construction Monitoring Program which were received on March 18, 2009.

**2009 Annual Report**

On April 13, 2010, the Nunavut Water Board (“NWB”) acknowledged receipt of the 2009 Annual Report from AECOM on behalf of Department of National Defence as a requirement of Part B, Item 1 of the current licence. The following documents were included with the report:

- a) Updated Site Figures;
- b) Selected Site Photos;
- c) July, August and September 2009 Analytical Results for Wastewater Samples; and
- d) July and August 2009 Monthly Report.

The report was forwarded to the distribution list for information. No comments were received regarding the submission. The annual report was found to be complete and meeting the reporting requirements of licence 1BR-LON0813. In addition, the NWB appreciates the inclusion of photographs to help aid in the understanding of the activities that have taken place.

**Spill Contingency Plan**

The Spill Contingency Plan (Plan) was distributed for information, and comments were received from Indian and Northern Affairs Canada (INAC) and from Environment Canada (EC) on March

9, 2010 and March 11, 2010, respectively.

Upon review of the Plan, INAC stated that the Plan is in compliance with the conditions found under Part H of the licence. However, it was noted that the 24-hour Spill Report Line telephone number is (867) 920-8130 and facsimile number is (867) 873-6924. INAC also requested that the proponent report all spills to Peter Kusugak, INAC Manager of Field Operations, phone: 867-975-4295, fax 867 975-6445 as well as to the Nunavut Spill Report Line.

EC stated that a general list of substances that could potentially be spilled at the FOX-2 site should be included with the Plan, and the personnel should have access to the Material Safety Data Sheets (MSDS). In Section 1.2.1 Fuel Storage Facility, the Plan does not confirm whether tanks are bermed, nor describes berm capacity. EC recommended the use of secondary containment, such as self-supporting insta-berms, for storage of all barreled fuel rather than relying on natural depressions to contain spills. EC indicated that the new CEPA Storage Tank System for Petroleum Products and Allied Petroleum Products Regulations came into force on June 12, 2008, and all storage tank system owners must identify their tank systems to EC and installation of new systems must comply with the regulation's design requirements. Further information on these regulations is available at [www.ec.gc.ca/st-rs](http://www.ec.gc.ca/st-rs). EC noted that Section 2.1, Reporting Procedures, should include reportable spill quantities, and provided the table. It was also indicated that a map of the site, including fuel storage area and locations of spill kits should be included prior to the commencement of camp activities, and also Section 4 Spill Response Training should be updated prior to the commencement of camp activities.

Upon review of the Plan, the NWB recommends that the following information be included within the future revision of the plan:

- The Section 2.1 Reporting Procedures should include a table of reportable spill quantities;
- The Section 3 Camp Site Map and the Section 4 Spill Response Training should provide complete information within the Plan;
- The Emergency Response Contact List provided in Section 18.5 should be up-dated and should include the INAC Inspector contact number with the Manager of Field Operations, phone: 867 975-4295, fax 867 975-6445 as well as the Nunavut Spill Report Line, phone 867 920-8130, fax 867 873-6924;
- The NT/NU Spill form should be attached to the document. The hard copy of NT/NU Spill form and guide should be available on site in the event that there is no internet access;
- It is not necessary to include the MSDS's in the Spill Contingency Plan in order to keep the plan size manageable as this information is required to be kept at the workplace under other legislation, however the location of MSDS's must be reference as being accessible.

### **Operation and Maintenance Plan**

The Operation and Maintenance Plan (Plan) was distributed for information and comments were received from the INAC and from the EC on March 9, 2010 and April 1, 2010, respectively. INAC stated that the Plan is in compliance with Part E, Item 2 of the current licence and is also in accordance with the "Guidelines for the Preparation of an Operation and Maintenance Manual for Sewage and Solid Waste Disposal Facilities in the Northwest Territories; 1996".

EC stated that EC Technical Document for Batch Waste Incineration provides information on incineration technologies, best management and operational practices, monitoring and reporting and is available at the following link:

<http://www.ec.gc.ca/drgd-wrmd/default.asp?lang=En&n=82401EC7-1>

It is noted that many EC comments and recommendations in general and unrelated to the Plan were provided and have already been included in the water licence terms and conditions.

NWB has reviewed the Plan and determined that the Plan fulfills the requirements of Part E, Item 2 of Licence 1BR-LON0813. The NWB has, therefore, approved the plan through Board Motion No. 2010-17-L03 dated October 12, 2010. However, the Section 7 Emergency Response including the Emergency Response Plan from the contractor which is a part of the Spill Contingency Plan, should be up-dated with above mentioned comments and submitted in the form of an Addendum with the Annual Report.

### **Post Construction Monitoring Program**

The Post-Construction Monitoring Program (Program) was also distributed for information, and comments were received from the INAC on March 9, 2010 and from the EC on March 22, 2010.

INAC stated that the Program is in compliance with the conditions found under Part J, item 16 of the Water Licence.

EC stated that there is no indication of what guideline levels the monitoring program will compare sample values to, and recommended that either guidelines are developed prior to implementing the Program, or available guidelines (e.g., CCME) are used. EC also recommended that the Program be up-dated once the sampling locations are determined. INAC and EC comments are available at NWB's FTP site under <ftp://nunavutwaterboard.org>.

NWB has reviewed the Program and determined that the Program fulfills the requirements of Part J, Item 16 of Licence 1BR-LON0813. The NWB has, therefore, approved the plan through Board Motion No. 2010-17-L04, dated October 12, 2010.

Should you have any questions, please feel free to contact the undersigned at (867) 360-6338 Ext. 30, at your earliest convenience.

Yours truly,

*Original signed by:*

Karén Kharatyan  
Technical Advisor

cc: Distribution List – Qikiqtani