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Your file - Votre référence
1BR-LOR
Our file - Notre référence
IQA-N 9545-2/ CIDMS
149403

May 25th, 2007

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

Re: 1BR-LOR, Cape Christain, Water Licence Application

The Water Resources Division of Indian and Northern Affairs Canada (INAC) has performed a review of the water licence application submitted to the Nunavut Water Board by the Contaminated Sites Directorate of Indian and Northern Affairs Canada. In conducting our review INAC Water Resources has made reference to all documents located on the Nunavut Water Board's FTP-site under the 1BR-LOR file.

Section 23, Spill Contingency Planning, of the Exploration/Remote Camp Supplementary Questionnaire states "A Preliminary Spill Contingency Plan (see Appendix E) has been developed for the site. The successful Contractor will also provide a Site Specific Contingency Plan prior to mobilization to site. INAC Water Resources requests the opportunity to review the SSSCP once it is submitted to the NWB.

Section 25, Section 23, Spill Contingency Planning, of the Exploration/Remote Camp Supplementary Questionnaire states "the Contractor will provide more specific information on the types, quantities, and the MSDS sheets for all fuel and chemicals on site, upon contract award." Furthermore, Section 25 also states, "handling, storage and use of all fuels from the storage tanks will be in accordance to the CCME, 2003: Environmental Code of Practice for Aboveground Storage Tank (AST) and Underground Storage Tank (UST) Systems. The proponent should clearly outline their method(s) for fuel storage at Cape Christian and clearly reference how they intend to use: CCME, 2003: Environmental Code of Practice for Aboveground Storage Tank (AST) and Underground Storage Tank (UST) Systems. INAC Water Resources requests the opportunity to review the such information once it is submitted to the NWB.

Section 32, Waste Treatment and Disposal, of the Exploration/Remote Camp Supplementary Questionnaire states "after site remediation, the lagoon(s) will be appropriately decommissioned following all applicable regulations and guidelines for sewage lagoon decommissioning in Nunavut". INAC Water Resources requests the

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proponent list all regulations and guidelines to be considered during decommissioning for verification. Section 32 also states “any bulky items or scrap metal waste generated at the site will be disposed of in the on-site landfill together with the wastes from the equipment yard. INAC Water Resources requests the Remediation Action Plan include a section on scrap metal and wastes from the equipment yard. The management of these materials should be included as a section in the operation and management plan for the landfill (see notes below).

Section 34, Waste Treatment and Disposal, of the Exploration/Remote Camp Supplementary Questionnaire states “details regarding the location of the disposal facility will be provided following Contract award and prior to mobilization”. INAC Water Resources requests to review such information prior to implementation.

Section 34, Operation and Maintenance, of the Exploration/Remote Camp Supplementary Questionnaire states “specifications for the waste facilities will be provided in the general contracting specifications and will be forwarded following contract. Again, INAC Water Resources suggests the NWB require such information for review prior to implementation.

Section 5.4 of Appendix B (Remediation Action Plan), Contaminated Soils, states “soil that exceeds the DCC Tier 1 criteria and does not exceed the DCC Tier 2 Criteria is to be excavated and buried in an on site nonhazardous landfill. Soils that exceed the DCC Tier 2 Criteria and/or are regulated by the Canadian Environmental Protection Act (CEPA) are to be excavated and shipped off site for disposal at a licensed facility.” This seems to contradict the Public Consultation Minutes (Nov. 29, 2006) which state “[Question]: will holes in the liner be of concern? [Answer]: No liner will be used, all contaminated soils will be shipped south”. Based on this statement INAC has two concerns. First, was the question posed in relation to the landfill, the landfarm or another piece of infrastructure? Second, the distinction between DCC Tier 1 and Tier 2 soils as listed above appears to contradict the statement made in the Public Consultation Minutes. Was the intent of the response by the proponent to address all contaminated soils, including hydrocarbon contaminated soils?

Section 5.6 of Appendix B (Remediation Action Plan), Hazardous Materials, mentions the disposal of asbestos in an engineered landfill on-site. INAC suggests the proponent ensure all asbestos disposal plans reference the Government of Nunavut’s Environmental Guideline for Waste Asbestos (January 2002).

Section 5.9 of Appendix B (Remediation Action Plan), Borrow Sources describes the location and quantities of borrow material. Section 5.9 does not provide a chemical characterization of the borrow materials. INAC Water Resources suggests the proponent provide evidence to the NWB that contamination of borrow material has not occurred.

Section 7.3.3 of Appendix B (Remediation Action Plan), Hydrocarbon Contaminated Soils lists numerous remediation options for hydrocarbon contaminated soils. Several of the options presented in Section 7.3.3 would not be INAC Water Resources recommended method of remediation. Thus, INAC Water Resources requests the opportunity to review

final plans for hydrocarbon remediation prior to implementation.

Section 9.3 of Appendix B (Remediation Action Plan), Waste Handling Facility Construction outlines plans for the construction and operation of the Waste Handling Facility. INAC Water Resources requests that all engineered plans are submitted to the Nunavut Water Board (NWB) for review prior to implementation. The proponent should recognize plans for infrastructure designed to convey water should be submitted to the NWB. INAC Water Resources considers the information contained in Section 9.3 very basic and does not consider the review complete until further documentation is submitted to the NWB. For example, does the proponent intend on submitting an operation and management plan and an abandonment and restoration plan for all proposed infrastructure?

Section 9.4 of Appendix B (Remediation Action Plan), Non-Hazardous Waste Landfill Engineering and Construction states “It should be noted that an engineered plan shall be developed for the draining of the freshwater reservoir. The plan to drain the reservoir must be designed by an engineer and approved by the site engineer and INAC prior to implementation.” INAC Water Resources requests that all engineered plans are submitted to the Nunavut Water Board (NWB) for review prior to implementation. The proponent should recognize plans for infrastructure designed to convey water are stand alone documents requiring submission to the NWB. INAC Water Resources considers the information contained in Section 9.4 very basic and does not consider the review complete until further documentation is submitted to the NWB. For instance why does discussion of the landfill design not mention a liner? Why is draining the fresh water reservoir the preferred method for landfill construction? Were other locations for the landfill considered? The proponent should provided greater evidence as to the decision points for the landfill design.

Section 9.5 of Appendix B (Remediation Action Plan), Landfarm Construction, discusses the design, operation and closure of the landfarm facility. INAC Water Resources considers the information contained in Section 9.5 very basic and does not consider the review complete until further documentation is submitted to the NWB. For instance, rational should be provided as to why the site for the landfarm was chosen. Furthermore, final design plans (stamped and sealed by an appropriate professional) should be submitted for review by NWB interveners.

Should you have any questions or comments, please do not hesitate to contact me at (867) 975-4548 or by email at BathoryS@ainc-ianc.gc.ca.

Sincerely,

Original Signed By

Stephen Bathory
Regional Coordinator

