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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI

NWB File No: 1BR-MAC

March 14, 2006

Mr. Phil Warren, Environmental Officer
Defence Construction Canada Ltd.
Constitution Square, Suite 1720
350 Albert St.
Ottawa, ON K1A 0K3
Email: Philip.warren@dcc-cdc.gc.ca

sent by email: Philip.warren@dcc-cdc.gc.ca

Re: Response to Information provided by UMA, Application for CAM-5, Mackar Inlet, DEW Line Clean-up

Dear Mr. Warren:

I have reviewed the letter prepared by UMA Engineering February 23, 2006, on behalf of DCC, in response to the letter sent to DCC by the NWB on February 15, 2006. The UMA letter does not sufficiently respond to the *Guidelines for Applicant* sent February 15, 2006. The NWB may not have been sufficiently clear in the guidelines, therefore I have prepared the following to further clarify what is required by the NWB to continue processing this application.

The *Guidelines for Applicant* sent February 15, 2006 are in italics below and the additional deficiencies/explanation regarding each guideline are described after the guideline.

1. *The Applicant shall provide detailed design plans prepared by a qualified engineer complete with stamped/signed drawings and plans for construction for all facilities pertaining to the use of water or disposal of waste, including but not limited to:*
 - a. *Sewage lagoons;*
 - b. *Incinerator;*
 - c. *Installation of culverts;*
 - d. *Removal of culverts and/or restoration of natural drainage;*
 - e. *Non-Hazardous Waste Landfill;*
 - f. *Tier II Soil Disposal Facility;*
 - g. *Excavation of all existing landfills;*
 - h. *Re-grading & cover of existing landfills;*
 - i. *Leachate containment facility for the Upper Site Landfill;*
 - j. *Hydrocarbon contaminated soil landfarm; and*
 - k. *Secondary containment for fuel storage.*

The NWB has downloaded stamped drawings from the UMA ftp site. The drawing set does not include stamped drawings for the following facilities as indicated above:

- Sewage lagoons; and
- Incinerator.

A drawing of the secondary containment for fuel storage should be included in the revised Spill Contingency Plan.

2. *The Applicant shall provide a description of the composition and volume of waste generated during the project as requested in Section 8 of the application form.*

The information provided in the UMA letter meets the above guideline requirement.

3. *The Applicant shall provide the following for the proposed incinerator:*
 - a. *Description of the process;*
 - b. *Anticipated performance;*
 - i. *Confirm the temperature is high enough to ensure complete combustion of all by-products and the appropriate emission control equipment is installed; and*
 - c. *Manufacturer's specification*

All waste disposal facilities must be qualified by a qualified engineer prior to issuance of a licence.

4. *The Applicant shall provide a detailed mapping which illustrates of all new site infrastructure planned or proposed for the site clean up, including but not limited to:*
 - a. *Clean up camp;*
 - b. *New sewage lagoons;*
 - c. *Discharge location and impact area for any and all treated effluents;*
 - d. *Temporary storage area (for containerized wastes waiting to be shipped south);*
 - e. *The area where barrel cleaning and washing of other wastes/equipment will take place; and*
 - f. *All mapping shall include drainage pathways and location of any seasonal or permanent water bodies.*

The UMA letter refers the NWB to Sections 8.3 & 8.3.2 of the Project Description submitted in September to the NWB as part of the water licence application. The NWB has reviewed these sections and they are general provisions, the NWB requires the proponent to describe and qualify management of water and waste throughout the project undertakings in accordance with Section 57 (a) the *Nunavut Water Surface Rights Tribunal Act*, “any waste produced by the appurtenant undertaking will be treated and disposed of in a manner that is appropriate for the maintenance of the water quality standards and effluent standards that are prescribed by the regulations or, in the absence of such regulations, that the Board considers acceptable”.

5. *The Applicant shall provide a description of any temporary storage area (s) for the containerized wastes including and overview of any mitigation measures proposed. The Applicant should confirm and document the requirements of the Government of Nunavut, Department of the Environment (GN-DoE) for the storage, shipping and overall management of hazardous wastes. Contact information for GN-DoE, procedural requirements and references to existing GN-DoE Guidelines should also be provided.*

Upon further review by the NWB, the NWB concurs with the proponent the project site is located on federal reserve and therefore not regulated by the Government of Nunavut but by the *Canadian Environmental Protection Act (CEPA)*.

If storage of PCBs on the site fall under CEPA's storage of PCBs regulations, the NWB would expect to receive the emergency response plans and maps showing the location of the site as part of the overall management and disposal of wastes under the water licence.

6. *The Applicant shall provide a Wastewater Management Plan, including but not limited to:*
 - a. *Description of sources of wastewater;*
 - i. *Camp;*
 - ii. *Barrel cleaning;*
 - iii. *Cleaning equipment;*
 - iv. *Excavations; and*
 - v. *Volumes from each source;*
 - b. *Collection, containment and treatment;*
 - c. *Assessment of discharge conditions and proposed discharge parameters; and*
 - d. *Monitoring.*

The response provided by UMA does not provide sufficient detail to satisfy the NWB that satisfactory mitigative measures are in place to reduce the potential impact to receiving water quality by wastewater generated through the project activities.

7. *The Applicant shall complete the NWB's, Supplementary Information Requirements For Hydrocarbon-Impacted Soil Storage and Landfarm Treatment Facilities (March 2005). The document can be found on the NWB website.*

The NWB determined that the information provided in the Project Description was insufficient. The Applicant shall complete and submit the NWB's *Supplementary Information Requirements For Hydrocarbon-Impacted Soil Storage and Landfarm Treatment Facilities* (March 2005) or complete and submit a concordance table to the supplementary information form.

8. *The Applicant shall provide a contingency plan that is consistent with NWB adopted guidelines for contingency planning.*
 - a. *The Applicant shall provide MSDS sheets for the detergent and solvents that will be used for barrel cleaning.*

The spill contingency plan submitted in the Project Description does not meet the NWB guidelines for contingency planning and a complete revision is required.

9. *The Applicant shall provide a Monitoring Plan encompassing all site activities relating to impacts to water and disposal of waste. The plan shall also include confirmatory sampling proposed to assess the effectiveness of completed remediation and long-term monitoring.*

The response to the above guideline provided by UMA does not provide sufficient detail to satisfy Section 48 (3) (e) of the *Nunavut Water Surface Rights Tribunal Act*, “the program the applicant proposes to undertake to monitor the impact of the use of waters or the deposit of waste.”

The NWB understands a Post Construction Landfill Monitoring Regime, has been negotiated between NTI and DND as part of the DEW Line Clean-up Environmental Provisions. It is also the NWB’s understanding that a site specific long-term monitoring plan, that follows the regime, will be developed for this site. The NWB does not require the long-term monitoring plan, to assess the effectiveness of remediation efforts, prior to issuance of the water licence.

However, prior to the issuance of a water licence, submission of a comprehensive monitoring plan is required to assess the impact of project activities, including but not limited to, wastewater generated;

- During barrel washing;
- Water collected from the landfarm;
- During decontamination of equipment; and
- Water pumped out of excavations of contaminated soil.

If you have any questions or require clarification, the technical staff are available to discuss these guidelines either by teleconference or in person.

Regards,

Original signed by:

Sarah Gagné, E.I.T
Technical Advisor

/sg

Cc: Phyllis Beaulieu, NWB Manager of Licensing, licensing@nwb.nunavut.ca
Dionne Filiatrault, NWB Director of Technical Services, srtech@nwb.nunavut.ca
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