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Your file - Votre référence

1BR-MAC

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9545-3-5MAC / CIDMS 151012

June 1st, 2007

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

Re: 1BR-MAC, CAM-5, Mackar Inlet Dew Line Site, 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 Defence Construction 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-MAC file.

Spill Contingency Plan

Table 15 of the Spill Contingency Plan (SCP) should be updated to include Peter Kusugak, 867-975-4295, as an initial contact for INAC. All other INAC employees listed in the SCP are no longer valid. Section 9.4 should be updated to include the Nunavut Spill Report Form. This form is available on the NWB's FTP-site. Furthermore, the SCP should indicate which individuals are responsible for spill response at CAM-5.

Exploration/Remote Camp Supplementary Questionnaire

Section 24, Spill Contingency Plan, should be amended to include a spill kit at all fuel storage and re-fueling areas.

Section 25, Spill Contingency Plan, requests the applicant submit information pertaining to the types, quantities, and method of storage of fuel and chemicals on site, and provide MSDS sheets. Document *050928 1BR-MAC Project Descript.-IACE-Part 9* presents designs for fuel storage. INAC requests the applicant clarify whether fuel storage areas include a form of secondary containment. Furthermore, the proponent is encouraged to list all types of fuel and chemicals kept on site and provide MSDS for all known substances. Commonly MSDS sheets are included as an appendix of the SCP.

Section 32, Waste Treatment and Disposal, and document *060503 1BR-MAC sewage lagoon info from specs* discuss plans for sewage treatment. INAC suggests the NWB require the applicant to submit final plans for the temporary sewage lagoon system including an operation and maintenance plan and an abandonment and restoration plan.

Abandonment and Decommissioning Plan

Landfarm closure states “at the conclusion of landfarm operations, additional granular material is placed to provide a compact cover.” What is the proposed depth of the compact cover? What decision points were considered in determining the depth of the compact cover? Is the intent of the landfill cover to promote permafrost encapsulation of landfill material? *Document 050928 IBR-MAC Project Descript.-IACE-Part 7* contains design plans for the Upper Site Landfill, Lower Site Landfill, Landfarm, Non-hazardous Waste, Tier II Disposal Facility. Are final engineered plans, stamped and signed by a qualified professional, going to be submitted prior to implementation? INAC suggest the NWB require final design plans, stamped and signed by a qualified professional, are submitted prior to implementation. Furthermore, INAC suggests the NWB include a licence condition stating the need for the applicant to submit as built designs, stamped and signed by a qualified professional.

Monitoring and Maintenance Plans

Table 16 suggests that covered landfill monitoring will only include a visual inspection. In the event that visual inspection raises concern what other monitoring methods will be employed?

The section titled Thermal Monitoring suggest geothermal analysis was conducted to determine the length of time required for permafrost aggradation through landfills. INAC suggests this information should be presented as part of the landfill design and closure plans.

Section 11.5.1, Tier II Soil Disposal Facility, states a facility is being constructed for the purpose of disposing Tier II contaminated soils. Section 11.5.2, Non-hazardous Waste Landfill, is being constructed for the purpose of disposing non-hazardous debris, demolition material and Tier I contaminated soils. Since the current water licence application filed with the NWB is for a new licence (i.e not a renewal) INAC suggests the proponent submit a final design plan, operation and maintenance plan and abandonment and restoration plan for the Tier II Disposal Facility and the Non-hazardous Waste Landfill and all other infrastructure to be constructed. Inac recommends all plans submitted to the NWB should be stamped and signed by a qualified professional prior to implementation. Again, INAC suggests the NWB include a licence condition requiring final as build records to be submitted to the NWB.

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