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12 April 2011

EC file: 4105 006 400  
NWB file: 1BR-PEE----

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**RE: 1BR-PEE---- Additional Information Site Specific Health and Safety Plan**

Environment Canada (EC) has reviewed the above-mentioned plan submitted to the Nunavut Water Board (NWB). 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*.

Indian and Northern Affairs Canada (INAC) has applied for a new Type “B” water license in support of remediation activities at PIN-E Cape Peel, an Intermediate Distant Early Warning (DEW) Line Site. The project is located approximately 80 km west of Cambridge Bay. The planned work is expected to occur annually between July and September, from July 2011 to December 2012. Project activities include: access to site via sealift and fixed-wing aircraft, establishment of a camp to support site operations, demolition of existing site infrastructure, waste segregation and disposal, site contamination remediation including landfarm construction, site roads and airstrip repair as required, on-site fuel storage, and installation of two temporary lagoons. INAC has submitted to the NWB a site specific Health and Safety Plan in support of proposed project activities.

Based on a review of the plan, EC provides the following comments and recommendations for the NWB’s consideration:

**1.0 Introduction**

- Under ‘Emergency and Regulatory Contacts’, the contact phone number for EC should be updated to read: Environment Canada - Enforcement Officer (Iqaluit) TEL: (867)945-4644.

**3.12.3 Spill Response Plan/APPENDIX F Site Specific Spill Contingency Plan**

- The EC contact number provided on page 104 of Appendix F should be updated to include (867)945-4644, as mentioned in the above comments.
- Refuelling shall not take place below the high water mark of any water body and shall be done in such a manner as to prevent any hydrocarbons from entering any water body frequented by fish.

- EC recommends that a map of the camp with marked locations of fuel storage sites and spill kits should be attached to the Spill Contingency Plan and be posted in an area visible and accessible to camp occupants.
- A section should be included in the Plan that provides direction regarding response action for spills on various types of terrain (e.g. spills on land, water, snow/ice, muskeg, etc.)
- The proponent should provide a general list of substances that could potentially be spilled on site. Personnel should be made aware of the properties of the products that they handle and have access to material safety data sheets (MSDS) and other sources of information. This information should be included in the Plan. A copy of the Plan should be posted at any location where these products are stored and at each fuel cache and refuel station.
- A spill kit, including shovels, barrels, absorbents, etc. should be readily available at all locations where fuel is being stored or transferred in order to provide immediate response in the event of a spill and should accommodate 110% of the capacity of the largest fuel storage container.
- EC recommends that a 24 Hour NWT/NU Spill Response Form be attached to the Plan or be kept in close proximity to the Plan at any location where fuel is stored or transferred.
- Spills are to be documented and reported to the NWT/NU 24 hour Spill Line at (867)920-8130. EC recommends that all releases of harmful substances, regardless of quantity, are immediately reported where the release:
  - is near or into a water body;
  - is near or into a designated sensitive environment or sensitive wildlife habitat;
  - poses an imminent threat to human health or safety; or,
  - poses an imminent threat to a listed species at risk or its critical habitat.

### **Section 3.16 Excavation, Treatment and/or Off Site Disposal of Contaminated Soils**

- EC notes petroleum hydrocarbon contaminated (PHC) soils on site at PIN-E will undergo different fates and treatment depending on their soil classification. Specifically, Tier I and Type A soils will be deposited as fill in the yet to be constructed non-hazardous landfill (NHL) at PIN-D and Type B soils will be landfarmed on site at PIN-E. Regarding Tier 1/Type A soils, it's not clear whether these soils will be deposited on-site at a newly constructed NHL at PIN-E or PIN-D as text in this section is contradictory (for reference see p.53 and 56). Regardless of the fate of the soils, EC would like to know what level of PHC soil contamination will be achieved for the Tier I and Type A soils before their disposal in a NHL and the soil remediation objectives for Type B landfarmed soils.

If there are any changes to the plan or in the proposed project, EC should be notified, as further review may be necessary. Comments previously submitted by EC regarding water license 1BR-PEE would still apply. 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](mailto:Paula.C.Smith@ec.gc.ca).

Yours truly,



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Environmental Assessment Coordinator

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