



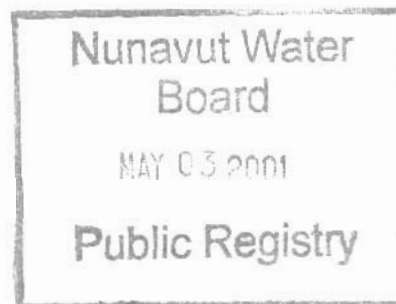
Environment
Canada

Environnement
Canada

Environmental Protection Branch
Qimugjuk Building, P.O. Box 1870
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May 2, 2001

Rita Becker
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0



Our File: 4517 000 005

| INTERNAL | |
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| PC | |
| LA | May 3/01 |
| OM | |
| TA | |
| BS | |
| ED | |
| CEO | |
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By Facsimile: (867) 360-6369

Re: Comments on New Water Licence NWB5PEL- UMA Engineering Ltd. - Cam-4 Pelly Bay (Kugaruuk) Dew Line - Pelly Bay, NU.

UMA Engineering Ltd. is seeking a water license to conduct the clean up of the former CAM-4, Pelly Bay Distant Early Warning (DEW) Line site, on behalf of Defence Construction Canada. The activities proposed are demolition/disposal of infrastructure, excavation/disposal of contaminated soils, collection of debris, closure of two landfills, development of two new landfill sites, development of a land farm area and complete/partial excavation of four existing landfills. The period of operation will be from July, 2001 to completion September, 2004 with an average of 35 people to be involved throughout the project on a seasonal basis. I have reviewed the above water licence application on behalf of Environment Canada (EC), and offer the following comments for your consideration.

Landfill Sites:

Within the materials provided the proponent did not provide a depth of granular fill that will be placed upon the reclaimed landfill sites. Environment Canada (EC) recommends that the proponent use a one meter minimum depth of granular fill when covering the landfills (Upper Site, Abandoned Camp, and Lower Site). The placement of the granular fill should take into account changes in slope in order to maintain the minimum one meter thickness as well as be placed in a manner that will not allow for ponding or pooling of water. The types of fill to be use must suit the requirements of each of the individual landfill sites as to not cause erosion, bank instabilities, or slumping.

The leachate containment systems at the Upper Site and Lower Site Landfills must be placed to ensure that all leachate identified within the Detailed Landfill Evaluation (Annex B) of the water licence application be within the containment system areas. All possible sources of leachate effluent must be contained and not come in contact with fish bearing waters. The leachate containment systems should also be monitored on a regular basis to ensure they are working effectively.

The proponent did not include with the application and project description details pertaining to the clean-up of the Airstrip landfill. EC recommends that the proponent provide these details.

Proposed Landfill Sites:

The proponent did not provide adequate information regarding how water is to be handled and treated during the construction and maintenance of the two proposed landfill sites (Station Area and Tier II Soil Disposal Landfills). EC recommends that the proponent provide a reclamation plan that will address the above concerns and the final abandonment of these facilities.

Canada

010502NWB5PEL comments - ILAE



Proposed Type B Hydrocarbon Land Farm

The proponent has addressed most of EC concerns with the proposed land farm within section 4.8 of the Environmental Protection Plan (Annex A). However, EC recommends that the proponent provide an abandonment plan and address how water is to be treated leaving the site.

Spills Reporting:

The proponent has indicated within the Spill Contingency Plan (Annex C) there is a threshold as to the size of spill to be reported. Under the Spills Agreement there is no provision for such a threshold, and all spills must be reported. Environment Canada supports this practice, as the effects of numerous small spills over time must be considered.

Wastewater Treatment:

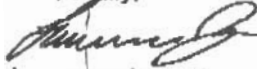
The proponent has not presented very clearly how wastewater is to be treated on site. Within the water licence application the proponent states camp sewage and grey water are to be placed into a sump then buried. Contrary to the project abstract which states sewage from the camp will be handled with, at minimum, primary treatment (settling tank) and discharged to ground surfaces. Environment Canada recommends all camp sewage and grey water under go primary treatment prior to being deposited in a sump then buried. The proponent must ensure sump is designed to handle proposed volumes of wastewater.

The following conditions should be applied to the proposed water license throughout all phases of the project.

- The proponent shall ensure that any sediments, chemicals, fuel or wastes associated with the proposed project do not enter waters frequented by fish. All sumps, spill basins and fuel caches should be located in such a manner that the contents do not enter a waterbody.
- No disturbance of the bed or banks of any definable watercourse is permitted. Special efforts must be made to avoid bed and bank disturbance during the spring.
- EC recommends the use of an approved incinerator.

Please do not hesitate to contact me (867) 975-4649 or email at lawrence.ignace@ec.gc.ca with any questions or comments regarding the foregoing.

Yours truly,



Lawrence Ignace
Environmental Assessment Specialist

cc: Paula Pacholek (Northern Environmental Assessment Coordinator, EPB)

FAX MESSAGE



Prairie and Northern Region
Environmental Protection Branch
Qimugjuk Building, P.O. Box 1870
Iqaluit, NU X0A 0H0

DATE: May 5, 2001FROM: Lawrence IgnaceTO: Rita BeckerEnvironmental Assessment SpecialistLicensing Administrator

PHONE:

PHONE: (867) 975-4639FAX: 867-360-6369FAX: (867) 975-4645Number of pages including cover: 3Subject: NIRB01EN042 - Kennecott Canada Exploration Inc.

Hi,

Please view the attached review letter.

NWB5PEL- UMA Engineering Ltd. - Cam-4 Pelly Bay (Kugaruuk) Dew Line - Pelly Bay, NU.

If you have further concerns or questions regarding the foregoing please call 867-875-4639 or me at
lawrence.ignace@ec.gc.ca.

Your Truly,

Lawrence