



Environment Environnement
Canada Canada

Environmental Protection Branch
Qimugjuk Building 969 P.O. Box 1870
Iqaluit, NU X0A 0H0
Tel: (867) 975-4639
Fax: (867) 975-4645

March 11, 2005

Our file: 4517 000 005

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Have, NU X0B 1J0
Tel: (867) 360-6338
Fax: (867) 360-6369

Via Email at licensing@nwb.nunavut.ca

**RE: NWB5PEL – Defense Construction Canada – CAM-4 Pelly Bay DEW Line Site
Clean-up Renewal**

On behalf of Environment Canada (EC), I have reviewed the information submitted with the above-mentioned application. The following specialist advice has been provided pursuant to Environment Canada's mandated responsibilities for the enforcement of the *Canadian Environmental Protection Act*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

Defense Construction Canada is proposing to continue their work on behalf of the Department of National Defense relating to the clean-up of the CAM-4 DEW Line Site located at Kugaaruk, NU. Clean up at the site began in 2001 and is expected to be completed by 2007, followed by a long term monitoring program.

Environment Canada recommends that the following conditions be applied throughout all stages of the project:

- Section 2.2.3 of the Project Status Update document attached to the application discusses treatment methods if water in the perimeter collection system of the landfarm is found to be contaminated with hydrocarbons (TPH). The document states "A water sample is collected and analyzed for Total Petroleum Hydrocarbons (TPH) prior to discharge events to determine if it meets the discharge guidelines. If the contact water does not meet these guidelines, it may be treated by..."
 - Environment Canada requests clarification regarding which guidelines are referred to in the statement above.
 - The statement indicates that if the contact water does not meet the guidelines in question, it **may** be treated prior to release. This statement should be changed to indicate that the contact water **will** be treated prior to release if it does not meet the discharge guidelines. According to the Fisheries Act, Section 36(3), the deposition of deleterious substances of any type in water frequented by fish, or in any place under any conditions where the deleterious substance, or any other deleterious substance that results from the deposit of the deleterious substance, may enter any such water, is prohibited.
- The proponent shall ensure that preventative measures are employed at water discharge points to prevent erosion.
- Section 2.7 of the Project Status Update document attached to the application indicates that the bottom portions of the POL tanks are being used for the interim storage of contaminated soils prior to their disposal on site. The proponent shall ensure that the



Environment Environnement
Canada Canada

- bottom portions of the tank are clean and free of contaminants prior to their destruction and disposal.
- Map H-P44/1-9101-102 "Overall Site Plan" included with the application indicates that there is a proposed new access road leading north from Borrow Area #2. While it is understood that this road is not being proposed as part of this application, EC recommends that the Nunavut Water Board require more information regarding this undertaking prior to its approval.
 - Map H-P44/1-9101-103 "Project Layout" included with the application details an area of debris in a lake requiring removal. Details regarding that aspect of the project are not included with this application. Environment Canada requests clarification regarding whether this work has been completed. If it hasn't been completed, EC requires information regarding the proposed work plan to remove the debris from the water.
 - Environment Canada recommends that construction activities be restricted to existing roadways and disturbed areas.
 - Environment Canada recommends that the storage location of the any overburden removed during construction activities be above the high water mark of any waterbody and in such a manner as to prevent sedimentation of any waterbodies.
 - **All spills** shall be documented and reported to the 24 hour Spill Line at (867) 920-8130.
 - Environment Canada recommends that all activities be conducted outside the migratory bird breeding season, which extends from approximately June 1-July 15. These dates are approximate, and if active nests (i.e., nests containing eggs or young) are encountered outside of these dates, the proponent should avoid the area until nesting is complete (i.e., the young have left the nest). Paragraph 6(a) of the *Migratory Birds Regulations* state that no one shall disturb or destroy the nests or eggs of migratory birds.

Any conditions recommended during the original review of this application in 2001 and the review of the amendments to this application in 2003 should also be applied to the remainder of this project. If there are any changes in the proposed project, EC should be notified, as further review may be necessary. Please do not hesitate to contact me with any questions or comments with regards to the foregoing at (867) 975-4639 or by email at colette.spagnuolo@ec.gc.ca.

Yours truly,

Original signed by

Colette Spagnuolo
Environmental Assessment / Contaminated Sites Specialist

cc: (Stephen Harbicht, Head, Assessment and Monitoring, Environment Canada, Yellowknife)