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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

File: **1BR-PEL0510/TR/G2, H3, J1**

October 4, 2010

Eva Schulz, P. Ag.
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**Subject: Licence No. 1BR-PEL0510, “CAM-4 DEW Line Site, Kugaaruk (Pelly Bay), Kitikmeot Region, Nunavut” – Defence Construction Canada;
Submission of the Updated Spill Contingency Plan under Part G, Item 2;
CAM-4 Pelly Bay As-Built Drawings under Part H, Item 3;
Landfill Monitoring Data at the CAM-4 Kugaaruk Site under Part J, Item 1.**

Dear Ms. Schulz:

The Nunavut Water Board (“NWB”) has completed a technical review of the Updated Spill Plan and CAM-4 Pelly Bay As-Built Drawings, received on May 31, 2010, and of Landfill Monitoring Data at the CAM-4 Kugaaruk Site, received on February 10, 2010.

Spill Contingency Plan

The updated Spill Contingency Plan (Plan) was distributed for information, and comments were received from the Government of Nunavut Department of Culture, Language, Elders and Youth (GN-CLEY) on April 28, 2010, from Indian and Northern Affairs Canada (INAC) on June 24, 2010, from Kitikmeot Inuit Association (KIA) on June 28, 2010 and from Environment Canada (EC) on July 2, 2010.

Upon review of the Plan, GN-CLEY indicated that appropriate actions shall be taken by proponent to ensure that the impacts of proposed developments upon heritage resources (archaeological and historical sites, burial grounds, paleontological sites, historic buildings and cairns) are assessed and mitigated before ground surface altering activities occur.

INAC stated that the correct information for INAC should be stated as follows: Peter Kusugak – INAC Manager of Field Operations, phone: 867-975-4295, fax 867-975-6445.

KIA indicated that the Licensee should keep the community informed and hire locally whenever possible. It was also suggested community involvement in the monitoring program to interest

students in the environmental field.

EC stated that a section should be included in the Plan which shall provide direction regarding response action for spills on various types of terrain (e.g. spills on land, water, snow/ice, muskeg, etc.). It was indicated that a general list of substances that could potentially be spilled at the CAM-4 site should be included with the Plan, and the personnel should have access to the Material Safety Data Sheets (MSDS). EC recommended the use of secondary containment, such as self-supporting insta-berms, for storage of all barreled fuel rather than relying on natural depressions to contain spills and indicated that refueling shall not take place below the high water mark of any water body, and hydrocarbon shall be prevented from entering any water body frequented by fish.

GN-CLEY, INAC, KIA and EC all comments are available from the NWB ftp site at the following link: <ftp://nunavutwaterboard.org>.

Upon review of the Plan, the NWB recommends that the following information be included within the future Spill Contingency Plan:

- Detailed response actions shall be provided for spills on various types of terrain (e.g. land, water, snow/ice, muskeg etc.);
- The Sections 3 and 5 shall be updated to include the contact information of INAC Manager of Field Operation in the event of a spill at 867-975-4295;
- A copy of NT/NU Spill form shall be attached to the document. The hard copy of NT/NU Spill form and guide should be available on site in the event that there is no internet access;
- It is not necessary to include the MSDS's in the Spill Contingency Plan in order to keep the plan size manageable as this information is required to be kept at the workplace under other legislation, however the location of MSDS's must be reference as being accessible.

CAM-4 Pelly Bay As-Built Drawings

NWB determined that provided CAM-4 Pelly Bay As-Built Drawings fulfill the requirements of Part H, Item 3 of Licence 1BR-PEL0510.

Landfill Monitoring Data – 2008 Final Report

The Environmental Working Group (EWG) submitted recommendations in regards to the Landfill Monitoring Report (Report). EWG recommended further investigation, during 2009 monitoring program, to determine the extent of free hydrocarbon product around the Non-Hazardous Waste Landfill in the vicinity of MW2. EWG stated that DCC Tier II Soil Disposal Facility's sampling points BMW-3 and MW-16 were not identified on the Record Drawing and not included in the Baseline Landfill Monitoring Report, and sampling report BMW-2 was not included in the present report. EWG stated that sample analysis results (soil and groundwater) from sampling points MW5 and MW9 presented as down-gradient results for the Tier II Disposal Facility should also be presented as up-gradient results for the Upper Site Landfill. EWG's comments are available from the NWB ftp site at the following link:

[ftp://nunavutwaterboard.org/1%20PRUC/1%20INDUSTRIAL/1B/1BR%20-%20Remediation/1BR-PEL0510%20CAM%204/3%20TECH/8%20MONITORING%20\(J\)/](ftp://nunavutwaterboard.org/1%20PRUC/1%20INDUSTRIAL/1B/1BR%20-%20Remediation/1BR-PEL0510%20CAM%204/3%20TECH/8%20MONITORING%20(J)/)

NWB has reviewed the Report and determined that the Report fulfills the requirements of Part J, Item 1 of Licence 1BR-PEL0510.

Should you have any questions, please feel free to contact the undersigned at (867) 360-6338 Ext. 30, at your earliest convenience.

Yours truly,

Karén Kharatyan
Technical Advisor

cc: Distribution List – Kitikmeot