



Environment Canada **Environnement Canada**

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Via Email

Re: NWB5PEL/TR/J1 – Defence Construction Canada – Submission of CAM-4, Pelly Bay DEW Line Site Monitoring Plan

On behalf of Environment Canada (EC), I have reviewed 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*.

Defence Construction Canada (DCC) has submitted a monitoring program for the CAM-4 DEW Line reclamation project to fulfill the Part J, Item 1 requirement of its water license. The proponent's monitoring program describes how soil and groundwater data will be collected to allow for the assessment of environmental impacts due to project reclamation activities. The CAM-4 DEW Line site is situated nearby the community of Kugaaruk, having a coordinate of 68°27'N, 89°45'W. Project reclamation efforts are ongoing, and the CAM-4 DEW Line project is scheduled to be complete by 2007.

The Monitoring Plan describes construction and post-construction programs, and detailed landfill requirements. The post-construction landfill monitoring plan summarizes the four evaluation components, namely visual, soil, groundwater, and thermal monitoring, and the frequency of monitoring landfills. The monitoring of landfills will be implemented in accordance with the DEW Line Clean-up Environmental Provisions established in the DND/NTI Cooperation Agreement. The detailed landfill monitoring requirements section summarizes the functions of each landfill, the types of landfill monitoring stations and their locations (e.g., soil and ground water monitoring wells and thermistors), and the frequency and parameters that will be used for monitoring the evaluation components.

The Monitoring Plan does not include any information regarding monitoring of the landfarm located on site. Environment Canada requests clarification regarding whether the landfarm is still operational, or if remediation objectives have already been met. Environment Canada recommends that if the landfarm is still operational, the Monitoring Plan be modified to include monitoring of hydrocarbons in the groundwater (total petroleum hydrocarbons (TPH)) and the soil (TPH fractions F1 – F3). The location of monitoring locations should be indicated on a map. Once remediation objectives are met and the landfarm is closed, further monitoring will not be required.



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The Plan does not currently include any provisions for monitoring groundwater at the east lobe of the lower site landfill. While soil monitoring is proposed for this lobe, no groundwater wells are indicated on Figure CAM 4.6. Environment Canada requests clarification regarding whether groundwater will be monitored at this location. If no groundwater monitoring is proposed, the proponent should provide justification regarding why it is not required for this lobe, but is included for the south lobe (monitoring location MW-19), which has also regraded and left in place.

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 if you have any questions or comments with regards to the foregoing at (867) 975-4639 or by email via colette.spagnuolo@ec.gc.ca.

Regards,

Original signed by

Colette Spagnuolo
Environmental Assessment / Contaminated Sites Specialist

cc. David Abernethy, Environmental Assessment Technician, Environment Canada, Iqaluit, NU