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Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, Nunavut X0B 1J0

April 4, 2025

Re: Response to comments on Application for Pelly Lake Remediation Project Water Licence 1BR-PLR----

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) submitted a Water Use Licence application for the remediation of Pelly Lake site (File No. 1BR-PLR----). Comments from Environment and Climate Change Canada (ECCC) and Department of Fisheries and Oceans (DFO) were received and here are CIRNAC's response.

Re ECCC comments:

We thank ECCC for their comment regarding the proposed Pelly Lake Remediation Project. Regarding the recommendation on details of post-remediation monitoring, we would like to provide some broader context of the work. The remediation plan is to remove almost all waste and leave no hazardous nor potentially hazardous material on-site. The only remaining material would be the old D4 bulldozer, a large steel cart, and an old turbine aircraft engine. This is because of the logistical complexity of removing them. These items will be inspected for any remaining fuels/liquids within the equipment and the paint will be tested for lead and PCBs. If there are any liquids within the large equipment, they will be drained, placed into suitable containers or drums for shipment off site. If the paint contains lead or PCBs, it will be scraped off and placed into suitable containers or drums for shipment off site. Any remaining material will be considered inert. Furthermore, no containment infrastructure will be built, rather as stated, all material will be removed from the site.

As such, no "long term" monitoring is necessary. This was a poor choice of words on our part – the monitoring meant was the sampling to confirm all contaminated material (in our case, sediment) has been removed, and that no environmental impacts from any remedial activities were incurred. Pertaining to the removal of the contaminated sediments, testing of the water downstream will be performed before excavation is done and later upon work completion to ensure that the water quality is still comparable. That said, the amount of sediment to be removed is very limited (6.1m³) and localized in a small channel of the pond (see picture below). No negative impacts are anticipated from the Project given sediment control and erosion mitigation measures will be implemented during work (as described in our EIA) and that the work will



include the removal of the contamination source (the broken batteries and the contaminated sediment).

Please advise if this information addresses ECCC's comment/concern. If further detail is deemed necessary, CIRNAC could set up a call to discuss the remaining concerns.



Re DFO comments:

Thank you for your comment regarding the proposed Pelly Lake Remediation Project. Regarding your recommendation on codes of practice for different water related activities, CIRNAC is committed to comply with the Fisheries Act and to implement the recommendation for protection to fish and fish habitat. Thank you for pointing out and providing links to relevant protocols for small water intakes and winter withdrawal activities.

Related to the in-water works restricted activity timing window, given the size and shallowness of the pond at our site, it is not believed to be fish bearing. However, CIRNAC will take a conservative approach and work will be done outside of both the spring and the fall spawning periods.

Finally, DFO has recommended that a site specific request for review be submitted. CIRNAC has initiated the process and will submit the required forms to DFO.

Please advise if this information addresses DFO's comment/concern. If further detail is deemed necessary, CIRNAC could set up a call to discuss the remaining concerns.

If you have any questions or comments, please contact the Project Manager, Rachel Théorêt-Gosselin at Rachel.theoret-gosselin@rcaanc-cirnac.gc.ca, or by telephone at (867) 222-1732 or the undersigned,

Sincerely

A handwritten signature in blue ink, appearing to read 'CLM', with a horizontal line extending from the left and a large loop on the right.

Charlotte Lamontagne,
Director, Contaminated Sites Program, Nunavut
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