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Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

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Phyllis Beaulieu
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0E 1J0

Sent by email to:
nwblic@polarnet.ca

Fox-5 Water Licence Amendment Application

Indian and Northern Affairs Canada (INAC) has reviewed the proposed water licence amendment submitted to the Nunavut Water Board (NWB) by Defence Construction Canada (DCC) with respect to the clean up of the Fox-5 DEW Line site situation on Broughton Island. We are pleased to present the following comments for the NWB's consideration.

In their February 14, 2003 amendment application, DCC indicates three amendments that they would like to make to their current project description. The first amendment relates to shipping PCB-containing-painted material off-site for disposal rather than the creation of an on-site landfill. The second amendment involves the creation of two hydrocarbon landfills, one near the heated vehicle storage and the other is at the station area. For their last amendment, the proponent desires to change the location of their Tier II disposal facility.

The comments presented below will be limited to the proposed amendments of the project.

PCB Landfill

With respect to the PCB related amendment, any painted materials containing PCB concentrations of more than 50 ppm will be containerized in a temporary PCB storage area. The containerized materials will then be transported to a licensed southern disposal facility for destruction.

INAC recommends that all appropriate PCB regulations be followed. This includes *Canadian Environmental Protection Act* regulations on the storage of PCB materials, as well

as the regulations of the *Transportation of Dangerous Goods Act* for shipment to the south. In addition, INAC recommends that once the PCB contaminated materials have been shipped down south for destruction, the temporary PCB storage area should be sampled to confirm that no PCB remain at that site.

Hydrocarbon Landfarms

The first landfarm will be constructed near the heated vehicle storage building, while the second will be constructed back at the station area. The reason for two landfarms instead of one is because of the distance that separates to two areas where hydrocarbon contaminated soils are located, and the poor condition of the road connecting the two areas. INAC does not object to the creation of two landfills provided that both are properly maintained and monitored.

INAC recommends that all runoff from the landfarms be properly contained. The water should be sampled to verify that it meets discharge guidelines before being discharged back into the environment. The proponent should provide a contingency plan indicating what will happen to water that does not meet the discharge guidelines. Although it is likely that the containment of the runoff will prevent hydrocarbons from leaving the site, monitoring stations should be included to verify this assumption. Likewise, a spill contingency plan should be available at or near the landfarm sites that indicate what actions to take in case hydrocarbons migrate from the landfarms. The progress of the treatment of hydrocarbon-contaminated soils should be monitored and included in the annual report required by the water licence. Finally, the two landfarms area should be properly closed and restored by the end of the project.

New Location for Tier II Disposal Facility.

The Tier II Disposal Facility is to be located at the middle site between the main station and the community. Only the location has changed; the design parameters and criteria of the disposal facility remain unchanged from the original application. The main difference is that any runoff from the disposal facility will now flow toward the municipal landfill area rather than toward a lake that the municipality was looking at as a potential secondary water lake.

Since the design parameters of the Tier II Disposal Facilities have not changed from the original water licence application, INAC has no additional concerns or comments related to the disposal facility. Although INAC does not expect any leachates to be generated from the secure disposal facility, we still recommend that a monitoring station be created just before the municipal landfill area. The purpose of this station would be to help differentiate whether the source of any contaminants that reach the ocean are from the Tier II Disposal Facility or the municipal landfill. Actual sampling from this station should only be required as needed.

If you have any concerns or questions, please feel free to contact me.

Sincerely,

Original Signed By: Michael Roy

Michael Roy
Qikiqtani Regional Coordinator, Water Resources
INAC - Nunavut Regional Office
P.O. Box 100, Iqaluit, NU, X0A 0H0
(867) 975-4555
fax: (867) 975-4276
roymjp@inac-ainc.gc.ca