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EC file: 4105 006 114
NWB file: 1BR-RES0916

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Via email: licensingadmin@nunavutwaterboard.org

RE: 1BR-RES0916 Resolution Island Amendment Application

Environment Canada (EC) has reviewed the information submitted with the above-mentioned amendment application to the Nunavut Water Board (NWB). The following specialist advice has been provided pursuant to the *Canadian Environmental Protection Act*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

Indian and Northern Affairs Canada (INAC) is applying to amend Type B water license 1BR-RES0916 for water use and waste disposal associated with activities under the BAF-5 Resolution Island Remediation Project Long Term Monitoring Program. Project activities included under this amendment are the use of a small camp and associated activities. The camp would be occupied seasonally, for a maximum of 30 days between July and September, between 2010 and 2030, and will house a maximum of ten people.

Upon review of the supporting documents for this amendment, EC provides the following comments and recommendations for the NWB's consideration:

Camp

- The proponent shall not deposit, nor permit the deposit of chemicals, sediment, wastes, or fuels associated with the project into any water body. 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 deleterious substance that results from the deposit of the deleterious substance, may enter any such water, is prohibited.
- The proponent states that combustible waste will be incinerated. EC recommends the use of an approved incinerator for the disposal of combustible camp wastes. EC has developed a Technical Document for Batch Waste Incineration, and is available at the following web link:
<http://www.ec.gc.ca/gdd-mw/default.asp?lang=En&n=F53EDE13-1>
The technical document provides information on appropriate incineration technologies, best management and operational practices, monitoring and reporting. If the waste is to be flown out for disposal, EC suggests that confirmation and authorization be obtained from the intended community landfill site prior to shipment.

- The proponent states that non-combustible waste will be shipped off site. If solid waste is shipped to the nearest community for disposal, EC suggests that confirmation and authorization be obtained from the intended community landfill prior to shipment (i.e. Iqaluit).
- All sumps used for the disposal of grey water shall be located above the high water mark of any water body and in such a manner as to prevent the contents from entering any water body frequented by fish.

Spill Contingency Plan

- Refuelling shall not take place below the high water mark of any water body and shall be done in such a manner as to prevent any hydrocarbons from entering any water body frequented by fish.
- EC recommends the use of secondary containment, such as self-supporting insta-berms, for storage of all barrelled fuel rather than relying on natural depressions to contain spills.
- EC recommends that a spill plan be provided and a spill kit, including shovels, barrels, absorbents, etc. should be readily available at all locations where fuel is being stored or transferred in order to provide immediate response in the event of a spill.
- Refuelling shall not take place below the high water mark of any water body and shall be done in such a manner as to prevent any hydrocarbons from entering any water body frequented by fish.
- Drip pans, or other similar preventative measures, should be used when refuelling equipment on site.
- Spills are to be documented and report to the NWT/NU 24 hour Spill Line at (867) 920-8130. All releases of harmful substances, regardless of quantity, are immediately reportable where the release:
 - is near or into a water body;
 - is near or into a designated sensitive environment or sensitive wildlife habitat;
 - poses an imminent threat to human health or safety; or,
 - poses an imminent threat to a listed species at risk or its critical habitat.

Comments previously submitted on behalf of EC regarding the Resolution Island site cleanup project would all still apply. If there are any additional changes in the 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) 975-4631 or by email at Paula.C.Smith@ec.gc.ca.

Yours truly,



Paula C. Smith
Environmental Assessment Coordinator

cc: Carey Ogilvie (Head, Environmental Assessment-North, EPO, Yellowknife, NT)
Ron Bujold (Environmental Assessment Technician, EPO, Yellowknife, NT)