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May 25, 2004

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

Via electronic mail to:
licensing@nwb.nunavut.ca

Re: Sacrpa Lake CAM-F DEW line site assessment

On behalf of Indian and Northern Affairs Canada Water Resources (INAC Waters), I would like to thank the Nunavut Water Board (NWB) for the opportunity to provide comment on the application of INAC Environment and Contaminants (the Proponent) to undertake detailed site assessment and preliminary waste management at the abandoned CAM-F (Sacrpa Lake) DEW line site.

Following a review of the Proponent's Water Licence Application and associated documentation, INAC Waters offers the following comments and recommendations:

Water Licence Application Form

- Section 4. The Proponent has identified the potential for the implementation of a temporary landfill leachate containment system if deemed necessary. While INAC Waters is not in opposition with such measures, it is recommended that the Proponent report, with photographic record, the construction of any leachate diversion/containment systems to the NWB.
- Section 7. The Proponent has identified the quantity of water involved as 63,000 L. Based on the information provided in Section 7 of the Exploration/Remote Camp Supplementary Questionnaire, this figure was calculated using the minimum expected personnel for the minimum expected camp duration. It is recommended that this number instead reflect maximum camp duration and personnel anticipated (126,000 L) allow the Proponent flexibility in staffing and scheduling without threatening compliance.

One of the water sources identified in Section 7, and also in Section 26 of the Exploration/Remote Camp Supplementary Questionnaire,

is a small seasonal unnamed lake near the campsite. It is recommended that the Proponent provide either an indication of the volume of water to be obtained from this lake, and/or an estimate of the volume of this lake, to ensure that an unacceptable level of draw down will not occur.

Exploration/Remote Camp Supplementary Questionnaire

Section 38. Although only a single year Water Licence is sought (Water Licence Application Form, Section 15), the Proponent has deferred from providing an Abandonment and Restoration (A&R) Plan on the premise of undertaking future restorative work at the site. It is also identified that waste from the Summer 2004 season will remain onsite (Exploration/Remote Camp Supplementary Questionnaire, Section 32). It is recommended that some measure of accountability for the waste produced in 2004 be incorporated into any issued Water Licence, and not deferred to a potential future Water Licence application.

Work Plan for Detailed Site Assessment - Sarcpa Lake (April 2004)

Page 3.5 It is recommended that, in the process of contaminated soil delineation, the Proponent make every effort to avoid the disruption and/or release of contaminated soils (including the resuspension of contaminated sediment) into the surrounding waters. Identified guidelines for avoiding disturbance, such as those provided for waste barrels, would assist in this area.

Figure 1.0 The Gantt chart, outlining the project implementation schedule, did not accompany this document.

Fuel Containment and Spill Contingency Plan

The Fuel Containment and Spill Contingency Plan is inadequate in its current state. It is recommended that the Proponent re-submit this document to include, at minimum, the following additional information:

- The name, address, and title of the person in charge
- The name, job title, and 24-hour contact information of the person responsible in the event of a spill
- A map of the spill kits locations onsite, as well an inventory of spill kit contents
- Additional information regarding the reporting structure of any identified spill, to include notification of the 24-hour Spill Report Line (867-920-

- 8130)
- An enhanced description of how the plan will be activated, response mechanisms, and feedback loops
- An enhanced description of the spill prevention and response training that onsite personnel will receive

Please do not hesitate to contact me if there are any further questions or concerns.

Best regards,

Original signed by:

Stephanie Hawkins

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