



**Environment Environnement  
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**RE: Indian and Northern Affairs Canada - Sarcpa Lake CAM-F DEW Line Project**

On behalf of Environment Canada (EC), I have reviewed the information submitted with 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*.

Indian and Northern Affairs Canada (INAC) is proposing to conduct a site investigation at the CAM-F DEW Line site located at Sarcpa Lake. The principle activities of the site investigation will include quantifying volumes of contaminated soils at the site, quantifying the volume of hazardous material at the site, quantifying the volume of liquid waste at the site, completing a waste audit of non-hazardous materials, identifying potential locations for the construction of an engineering landfill, identifying borrow sources for the landfill, completing a human health and ecological risk assessment at the site to help determine clean-up criteria, sampling of sediment in surrounding water bodies, and evaluating the condition of the runway. Additional work to be completed includes consolidating empty barrels for crushing, removal of previously containerized PCB's for disposal off site, evaluating the need and potentially implementing a temporary leachate collection system at existing dumps, and preparing a detailed design for future site remediation activities.

Environment Canada recommends that the following conditions be applied throughout all stages of the project:

- An approved incinerator should be used for the disposal of combustible camp wastes.
- Once available, EC requests that the proponent submit a map detailing the location of all sumps, including those for the disposal of camp sewage and grey water.
- An Operations and Maintenance (O&M) manual should be prepared and implemented once site remediation plans are started.
- All sumps shall be located above the high water mark and in such a manner as to prevent the contents from entering any water body frequented by fish. Further, all sumps shall be backfilled upon completion of the field season and contoured to match the surrounding landscape.
- All fuel caches shall be located above the high water mark and in such a manner as to prevent the contents from entering any water body frequented by fish. Environment Canada is pleased that INAC will be using secondary containment for the storage of

barrelled fuel on location.

- INAC is currently proposing to sample the sediment of Sarcpa Lake to determine if any contamination by PCB's, heavy metals and hydrocarbons has occurred. Environment Canada recommends that water samples also be taken to determine if the water itself has been contaminated.
- Environment Canada requests the opportunity to review the design of the proposed leachate collection system, should one be deemed necessary.
- Table 6-1 in the report entitled "CEAA Environmental Screening for CAM-F DEW Line Site Project" attached to the water license application indicates that no mitigation will be implemented to reduce the potential impact of emissions of greenhouse gases, nitrous oxides, sulphur dioxide, particulate matter, and carbon monoxide from vehicles. Environment Canada recommends that low sulphur fuels be employed to help reduce greenhouse gas emissions from vehicles at the site.
- Section 6.7.1.1 of the report entitled "CEAA Environmental Screening for CAM-F DEW Line Site Project" attached to the water license application discusses the *Species at Risk Act* (SARA). Environment Canada would like to inform the proponent that effective June 1, 2004, all of the SARA prohibitions will come into effect for those species listed as endangered or threatened on Schedule 1 of the *Act*. Environment Canada staff are available to discuss the implications of SARA on the CAM-F project.
  - Environment Canada would like to inform INAC that the polar bear, wolverine and peregrine falcon as listed as "species of special concern" by SARA, not as "Species at risk" as identified in Section 6.7.1.1.
  - Environment Canada would also like to call the proponent's attention to Section 6(a) of the *Migratory Birds Regulations* which state that no one shall destroy or disturb migratory birds or their nests or eggs.
- The Fuel Contaminant and Spill Contingency Plan should be enhanced to include the following information:
  - Detailed plans to deal with spills of hazardous substances on land, water and snow
  - The location of spill response equipment, including contact information for where additional support and equipment can be obtained, if required.
  - Contact information for key personnel, such as the INAC Project Officer, the PWGSC Environmental Manager, Site Manager, etc...
  - All spills must be documented and reported to the NWT Spill Line at (867) 920-8130.

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 with any questions or comments with regards to the foregoing at (867) 975-4639 or by email at [colette.meloche@ec.gc.ca](mailto:colette.meloche@ec.gc.ca).

Yours truly,

***Original signed by***

Colette Meloche  
Environmental Assessment / Contaminated Sites Specialist

cc: (Paula Pacholek, Northern Environmental Assessment Coordinator, Environment Canada, Yellowknife)