



August 4, 2004

Mr. Jim Wall
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0

Dear Mr. Wall:

INTERNAL	
PC	clp
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Your file - Votre référence

Our file - Notre référence

Nunavut Water
Board

AUG 24 2004

Public Registry

RE: Response to Provisions in Water Use Licence No. NWB5SAR0406 – Type “B” for CAM-F Site Investigation

Thank-you for approving and licensing our application to complete the Site Investigation process at the CAM-F (Sarcpa Lake) DEW Line Site. I have reviewed your licence document and will comply with all terms. As previously discussed, I would like to provide you with documentation required in the licence as follows.

I have attached our final Spill Contingency Plan. This plan is similar to that previously provided to you but has been updated to include project related specifics.

A formal Abandonment & Restoration Plan will not be completed for the site at the conclusion of the Site Investigation since this “project” will form only the first phase of a complete Remediation Program. Hence, the plan to abandon will be submitted at project completion. Specific activities, however, will be completed at conclusion of the Site Investigation to fulfill the requirements of the licence as follows:

- wastewater pits/trenches will be closed and re-contoured to match the surrounding topography where required;
- test pits advanced as part of the site investigation and geotechnical work will be closed;
- camp, including tents, tables and all portable structures will be taken down and either stored in permanent structures or removed from the site; and
- other miscellaneous disturbances or issues that may be encountered will be dealt with on a specific basis.

All restoration activities will be completed prior to site closure within the 2 year time span of the licence. Following completion of the site work, a follow up letter will be provided to the Water Board documenting exactly what restoration actions were carried out at the site.

Freshwater quantities pumped from the lake will be estimated and provided to the Water Board at the conclusion of the project. Quantities are expected to be well below the maximum volume identified in the licence of 10 cubic meters, however, it should be noted that a water flow meter will not be placed on the water line.

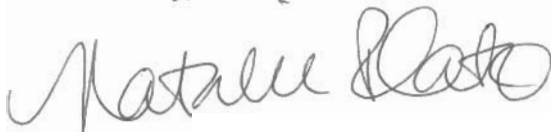
Public consultation has been carried out on the complete Site Remediation project. Further consultation will be completed in the adjacent communities of Hall Beach and Igloolik following the completion of the site assessment work. INAC will present the results of the program and the general activities that will be carried out as part of the Remediation program. This information will be documented and provided to the Water Board prior to the end of fiscal year 2004/05.

Signs will be posted at the water intake location(s) identifying them as a "Water Supply Facility" in both English and Inuktitut. These locations, as well as the pit/trench locations, used for wastewater disposal, will be identified on the site plan using a global position system.

With the exception of test pitting for the purposes of completing the site investigation and temporary erection of the camp, no construction activities are expected to be carried out as part of this phase of the project. If emergency remediation or other unforeseen dyking or damming activities are completed at the site this summer, these design drawings will be stamped and provided to the Water Board for approval.

If you have any questions or comments, please do not hesitate to contact the undersigned at (867) 979-7934.

Sincerely,

A handwritten signature in black ink, appearing to read 'Natalie Plato', with a stylized, cursive script.

Natalie Plato
Acting Manager, Contaminated Sites Program
Indian and Northern Affairs Canada

Encl. Final Spill Contingency Plan

10. EMERGENCY RESPONSE AND SPILL CONTINGENCY PLAN

10.1 Background

Materials stored at the Sarcpa Lake (CAM-F) Temporary PCB Storage Area include soils and articles contaminated with polychlorinated biphenyls (PCB) generated during environmental clean up operations at the former CAM-F Distant Early Warning (DEW) Line site. The concentration of PCB in the contaminated soils and other articles exceed the regulatory limit of 50 ppm established in the *Chlorobiphenyl Regulations*. A temporary storage area has been set up at Sarcpa Lake to securely house the PCB materials awaiting disposal. Other PCB containing materials in storage include asbestos fibre pipe insulation painted with PCB amended paint and oil containing PCB. Some non-PCB containing materials stored within the Sarcpa Lake facility includes used protective clothing, rags and a container of paint thinner.

PCBs are a toxic substance under Schedule 1 of the *Canadian Environmental Protection Act* and their storage is regulated under SOR/92-507 *Storage of PCB Material Regulations*. PCB materials at the Sarcpa Lake facility are stored within sealed 205 L barrels on pallets within a former DEW Line facility warehouse. All containers are sealed and are not to be opened while in storage. The soil containing PCBs is considered dry and non-flammable. Combustible and flammable materials including the PCB oil and the paint thinner are segregated within the storage area and are contained within metal overpack barrels.

Sarcpa Lake is a northern, unmanned facility and is considered isolated.

10.2 Fire Contingency and Reporting

The majority of the PCB contaminated materials stored at the Sarcpa Lake facility consist of soils contaminated with PCBs and are considered non-flammable. Combustible and flammable materials

including the container of PCB impacted oil and the non PCB containing paint thinner are stored within sealed metal overpack barrels to provide secondary spill containment, as well as shield the materials from potential ignition sources. Due to the arctic environment of the site, it is considered unlikely that the auto-ignition temperature of the liquids will be achieved. Internal ignition sources have been eliminated from the building. **Smoking is not permitted within the PCB storage facility.**

It should be noted that CAM-F is an unmanned facility, populated on a periodic basis during inspections or during remedial activities. In the event of a fire in the vicinity of the Sarcpa Lake PCB storage facility, it is assumed that any staff present on-site would become the primary emergency response resource. Emergency back-up would be provided through the office of the Nunavut Fire Marshal or by a Contractor to Indian and Northern Affairs Canada (INAC), as coordinated by the INAC project manager. On-site personnel are not to fight this fire unless the fire is manageable and proper fire suppression equipment and personal protective equipment is available. As a minimum, fire-fighting personnel will wear a full-face air-purifying respirator with an organic vapour cartridge. It is the responsibility of the fire department to determine fire suppression requirements if they are called to the site to fight a larger fire, based on the specific conditions and in recognition that the exposure of PCB contaminated materials results in the formation of black soot that contains PCB's, dioxins and furans.

Any person discovering a fire at the PCB facility will immediately report the incident to Indian and Northern Affairs Canada and the Nunavut Fire Marshal, as indicated on the attached contact list (Tab 9). Indian and Northern Affairs will contact Environment Canada to advise of the situation. The INAC project manager will determine mitigation requirements and mobilize qualified personnel, as required, for clean up after the fire is suppressed. A step by step Fire Response Plan follows and should be placed at the entrance to the storage facility.

10.3 Spill Contingency and Reporting

Due to the nature of the material being stored on this site (solids) and types of containers used, spills are not anticipated for this site. If a spill of materials or significant damage to the containers is discovered the INAC Project Manager will contact the Northwest Territories Spill Line by facsimile or phone to advise the operator of all information relative to the event. In the event that the INAC project manager is not available, the Environment Canada - Environmental Emergency Response centre should be contacted. A copy of the report to be submitted is attached.

In the event of a major spill and/or damage to the containers on site, the Project Manager will ensure mobilization of the appropriate resources to contain the spill. Notify the INAC project manager (see emergency contact sheet, Tab 9) immediately at (867) 979-7931. If the project manager is not available, notify the 24 hour Spill Line directly at (867) 979-6445. Environmental response teams will typically involve an INAC contractor. Once resources have been mobilized, the Project Manager will contact Environment Canada to advise them of the nature and extent of the spill and corrective actions being employed. Upon completion of the initial clean up efforts, appropriate sampling may be taken to determine if additional clean up and restoration efforts are required.

Upon discovering a minor spill (less than the contents of 1 storage barrel), available on-site personnel will be considered the primary clean-up resource. The following steps are to be followed upon discovering a minor spill:

- Notify the INAC project manager (see emergency contact sheet, Tab 9) immediately at (867) 979-7931. If the project manager is not available, notify the 24 hour Spill line directly at (867) 979-6445.

- A spill kit is located within the PCB storage facility and contains personal protective equipment (PPE), hand tools and absorbent material. The spill kit container is to be used to hold recovered material from the spill.
- For dry material spills, don appropriate PPE, including Nitrile rubber gloves, Tyvex coveralls and overboots. Use hand tools including shovels, broom and dustpans to recover the spilt material and place it within an empty storage container. Clean hand tools of any residue and place used PPE and residue within the new storage container.
- For wet material spills, don appropriate PPE, including Nitrile rubber gloves, Tyvex coveralls, overboots and particulate/organic vapour cartridge respirator. Use absorbent material within the spill kit to contain and absorb the spilt liquid. Use hand tools to recover the spent absorbent materials and place them within the new storage barrel. Seal the storage barrel and place it within a metal overpack barrel.
- Complete a spill report form (attached).
- Apply the Environment Canada registration label to the new container and add the container to the storage area inventory.
- Do not attempt to clean up the spill if you suspect the presence of asbestos. Leave and secure the storage facility immediately and notify the INAC project manager.

Annex
If You Discover A Fire

*(Display this Form near the
Storage Area Entrance)*

Spill Report Form

If You Discover a Fire

- 1) Alert others to the presence of the fire and remove yourself from the building to a safe location up wind of the fire.
- 2) Assess the situation including size of the fire, potential hazards (burns, explosions, falling debris, etc.) and the availability of on-site fire fighting equipment. Make sure all personnel on site are accounted for.
- 3) If safe to do so, contain or suppress the fire with the appropriate materials on hand.
- 4) **As a minimum, fire fighting personnel must be equipped with a full-face air purifying respirator with an organic vapour filtration cartridge.**
- 5) Do not attempt to extinguish the fire if adequate personal protective equipment (masks, fire-retardant clothing) and fire fighting equipment is not available.
- 6) Notify Nunavut Fire Emergency Services at (867) 975-5316.
- 7) Notify Nunavut Emergency Medical Services at 1-800-693-1666 if necessary.
- 8) Notify the Project Manager at (867) 975-4500.

SPILL REPORT FORM

Attach additional information or sketch here.

