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Water Resources Division
Nunavut Regional Office
Indian and Northern Affairs Canada
Iqaluit, NU X0A 0H0

Our File: 9545-2-1SLPA.CAMD
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Monday, May 26, 2008

Richard Dwyer
Licence Administrator
Nunavut Water Board
Gjoa Haven, NU X0B 1J0

**Re: 1BR-SIM, Indian and Northern Affairs Canada – Contaminated Sites
Directorate, CAM-D (Simpson Lake) Remediation Project, Kitikmeot
Region, Licence Application**

Dear Mr. R. Dwyer,

Indian and Northern Affairs Canada (INAC) Water Resources Division reviewed a license application submitted by the INAC Contaminated Sites Directorate for the remediation of the former CAM-D (Simpson Lake) Intermediate Distant Early Warning (DEW) Line Site. The following advice has been provided pursuant to INAC's mandated responsibilities for the enforcement of the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

The CAM-D (Simpson Lake) Remediation Project area is situated on Crown Land in the Kitikmeot Region, at 68°35' north latitude, 91°57' west longitude. The proponent intends to remediate the CAM-D intermediate DEW Line Site in accordance with the guidance principles specified in its Abandoned Military Sites Remediation Protocol (March 2005). Indian and Northern Affairs Canada, Water Resources Division is supportive of the Board in issuing a Type B industrial license to the INAC, Contaminated Sites Directorate to allow for the CAM-D (Simpson Lake) Intermediate DEW Line Site's reclamation. This site is considered to be contaminated and poses a threat to the quality of surrounding freshwater sources. However, the Board should request that the proponent to:

- indicate which recommendations they have accepted and will be implementing;
- complete and provide the Board with supplementary questionnaires for hydro-carbon soil storage and water crossings; and
- keep the Board informed of any significant changes made during the remediation project.

The following comments are provided for the Board's consideration when reviewing this licence application.

A. General Recommendations

1. The Proponent should indicate to the Board which recommendations provided in the EarthTech Remedial Action Plan (December 2007) will be implemented in its remediation project.
2. The Proponent should submit completed Nunavut Water Board supplementary questionnaires for Hydrocarbon-impacted Soil Storage and Landfarm Treatment Facilities and Technical Information Required for Water Crossings.

B. Water Use and the Protection of Water

1. The Proponent should indicate what surface water management measures will be implemented in the project area (e.g., handling of runoff flowing into and from the non-hazardous waste landfill, fuel management area, roadways, and waste processing areas).

C. Waste Disposal

1. Prior to the construction of the project's two (2) independently operated sewage lagoons, all domestic wastewater should be contained within appropriately sized sumps. These sumps should be situated at least thirty (30) metres above the ordinary high water mark of nearby water sources and, prior to abandonment, covered with native material in a manner that promotes positive drainage.

D. Camp, Access Infrastructure, and Operations

1. As-built drawings for the two (2) independently operated sewage lagoons should be submitted to the Board for approval prior to their commissioning.
2. As-built drawings for any non-hazardous waste landfills, landfarms, and waste processing areas should be submitted to the Board with an Annual Report for the year during which the construction and operation of the facilities is completed.

E. Spill Contingency Planning

1. A stand alone Hazardous Materials Spill Contingency Plan, specific to the CAM-D (Simpson Lake) Remediation Project, should be provided to the Board. This Plan should address those recommendations provided in the Nunavut Impact Review Board's Screening Decision Report 08DN011 (i.e., Item 25: Fuel Storage / Spill Contingency).

2. The Proponent is responsible for the implementation of appropriate fuel management and spill contingency measures at its CAM-D (Simpson Lake) Remediation Project. The Proponent should provide revised plans to the Board for approval prior to the commencement of project activities.

F. Abandonment and Reclamation

1. The Proponent should provide an Abandonment and Reclamation Plan to the Board for approval. This Plan should include seasonal closure and final abandonment and reclamation procedures.

G. Monitoring Plan

1. The Proponent should provide a Monitoring Plan specific to the CAM-D (Simpson Lake) Remediation Project to the Board for approval. This Plan should include the coordinates of areas where water is withdrawn, wastewater effluent is discharged, and any other applicable water quality surveillance points; a quality assurance / quality control plan; and any other monitoring activities applicable to the INAC *Abandoned Military Site Remediation Protocol* (March 2005).
2. The Proponent and the INAC Inspector should consult on final monitoring sites and inform the Board, including reasons for monitoring site selection.

Indian and Northern Affairs Canada requests notification of any changes in the proposed project, as further review may be necessary. Please contact me should you have any questions or comments with regards to the foregoing. I can be reached by telephone at (867) 975-4555 or email at AbernethyD@inac-ainc.gc.ca.

Regards,
Original signed by

David W. Abernethy
Regional Coordinator

Carbon copy:
Jim Rogers, Manager of Water Resources – INAC, NRO