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Via email: iporter@nunavutwaterboard.org

## RE: 1BR-SIM0813 O&M Manual

Environment Canada (EC) has reviewed the above-mentioned information submitted 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*.

CAM-D is a DEW Line site located approximately 120 km southwest of Taloyoak. Under Water License 1BR-SIM0813, the remediation of this site includes the operation of a camp to support clean up activities. To fulfill the conditions of the water license, an Operation and Maintenance (O&M) Manual for the management of solid wastes generated on site and the operation of the waste handling facility is required and was prepared by Kudlik Construction Ltd. on behalf of Indian and Northern Affairs Canada and submitted to the NWB.

Upon review of the O&M Manual, EC provides the following comments and recommendations for the NWB's consideration:

- The proponent must ensure that any effluent discharged must be in compliance with Section 36(3) of the Fisheries Act. The proponent shall not deposit, nor permit the deposit of any wastes, chemicals or sediment 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 other deleterious substance that results from the deposit of the deleterious substance, may enter any such water, is prohibited.
- EC recommends that all potential products that are attractants to wildlife be made inaccessible to wildlife at all times. Camp waste can attract predators of migratory birds (e.g., foxes and ravens) to an area if not disposed of or stored properly.
- 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 there are any changes in the project EC should be notified as further review may be necessary. Comments previously submitted on behalf of EC regarding water license 1BR-SIM0813 would still apply to this project. Please do not hesitate to contact the undersigned with any questions or comments with regards to the foregoing at (867) 975-4631 or by email at <a href="mailto:Paula.C.Smith@ec.gc.ca">Paula.C.Smith@ec.gc.ca</a>

Yours truly,

Paula C. Smith

**Environmental Assessment Coordinator** 

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