Indian and Northern Affairs Canada

Affaires indiennes et du Nord Canada

Nunavut Regional Office P.O. Box 2200 Iqaluit, NU, X0A 0H0

June 26, 2009

Richard Dwyer Licensing Administrator Nunavut Water Board P.O. Box 119 Gjoa Haven, Nunavut X0B 1J0

Dear Mr. Dwyer:

# RE: LETTER OF EXPLANATION - FOX-B (NADLUARJUK LAKE) SITE ASSESSMENT

As per our conversation today, it is proposed that through proper planning, the phase 3 environmental site assessment at FOX-B Nadluardjuk Lake can be managed so that a Water Use Licence is not necessary. At the same time, it is very important that the project meets the requirements of the Nunavut Water Board.

It is our understanding that a water licence is not required under the Nunavut Waters and Nunavut Surface Rights Tribunal Act, if there is no use of water, and no disposal of wastes. The project has been planned to neither use water nor leave wastes on site. Bottled water (for drinking) and water for other uses will be brought in and wastes generated on-site will be removed from the site on a daily basis. There will be a daily morning flight into FOX-B from Igloolik/Hall Beach bringing food, potable water and other necessities and a daily evening flight out of FOX-B to Igloolik/Hall Beach that will carry out any and all waste (solid and liquid) out of the site. This is a relatively minor project and it is anticipated that the site assessment will take approximately one week (excluding the mobilization and the demobilization dates).

This letter is to request your concurrence on the need for a Water Use Licence. For further information, I have attached the executive summary of the project description.

If you have any questions or comments, please contact the undersigned or the Project Manager, Dele Morakinyo at dele.morakinyo@inac-ainc.gc.ca, or by telephone at (819) 934-9224

Sincerely

Natalie Plato

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# FOX-B (NADLUARDJUK LAKE) REMEDIATION PROJECT (EXECUTIVE SUMMARY)

#### 1. BACKGROUND

The Government of Canada has implemented the Federal Contaminated Sites Accelerated Action Plan (FCSAAP) to clean up federally owned contaminated sites which pose a risk to human health or the environment. The Department of Indian Affairs and Northern Development (DIAND) has applied, and received funding approval, for the investigation and remediation of the FOX-B (Nadluardjuk Lake) in Nunavut.

FOX-B (Nadluardjuk Lake) site was reserved by the Department of National Defence (DND) in 1956 and the FOX-B Intermediate Distant Early Warning (DEW) Line Site was constructed in 1957, and subsequently abandoned in 1963. The site was typical of all Intermediate DEW Line sites and consisted of a module train, warehouse, garage, Inuit house, POL tanks, and a Doppler antenna. During a 1993 assessment it was noted that only the garage, Inuit house, POL tanks and a Core Camp remain.

IN 1991, DND constructed the North Warning Station (NWS) on the footprint of the former Intermediate DEW Line site main operations station. DND has administration and control of several land parcels at the site including the former main operation station and the airstrip. The main airstrip is located about 3 kilometres southwest of the main station area, along the northern edge of an unnamed lake. The SRR is still operational and is situated on a hill about 150 metres above sea level (the former location of the main operation station) located just to the west of Nadluardjuk Lake.

The other facilities were dismantled when the North Warning System (NWS) Short Range Radar (SRR) facility was constructed in 1991. A core camp was brought to the site during the construction of the SRR facility; responsibility for the camp was transferred to INAC in 1994. The camp is now in a state of disrepair and it needs to be dismantled and disposed of during the site remediation.

The area is characterized by large boulders and unsorted granular material. The quantity of soil on site is limited and is derived from poorly weathered, fine grained till deposits. There is moderate vegetation consisting of mainly grasses and willows. The wildlife typically found in this region includes polar bears, caribou, wolf, arctic fox, snowshoe hare, raven, osprey, shorebirds, seabirds, and waterfowl.

The following environmental concerns have been identified at this site:

- Buildings And Infrastructure;
- Landfills/Surface Dumps (3);
- Hazardous Debris;
- Barrels (Approximately 8,000 barrels noted on-site);
- Metals and Petroleum impacted Soils

## 2. SITE LOCATION/ACCESS

FOX-B (68°37'0"N and 73°12'0"W) is located 270 kilometres Southwest of Clyde River, Nunavut. Other close-by communities are Hall Beach and Igloolik, respectively at 330 Km and 350 Km to the site. It is located on the west side of Baffin Island, Nunavut, approximately 32 kilometres from the coast. The site is landlocked and can only be accessed via aircraft (from the nearby communities) or overland.

#### 3. PROJECT ACTIVITIES & SCHEDULE

DIAND is planning to clean-up the FOX-B (Nadluardjuk Lake) site. To be able to accomplish this task, INAC is required to develop a Remedial Action Plan (RAP) for the site. All site assessment activities required to develop the RAP will be carried out during the 2009-10 field season. The planned site assessment activities include:

- Obtain traditional knowledge regarding past and present land use of the site from elders
  of the nearby communities; with respect to potential contamination;
- Identify, characterize, and quantify all hazardous and non-hazardous materials at the site and in nearby water bodies;
- Identify and delineate all contaminated areas at the site;
- Complete a detailed site survey, including the documentation of any flora fauna noted at the site and a brief description of the site based on literature and professional experience;
- Conduct water sampling at freshwater lake to determine if it is suitable for usage as a potable water source;
- Identify potential locations for engineered landfill(s) and/or landfarm on-site;
- Identify borrow sources that may be used for the potential repair of site roads, airstrip, and barge landing areas as well as for the construction of a potential landfill(s) and/or landfarm on-site:
- Evaluate the condition of site access roads, barge landing areas, and airstrip;
- Evaluate the logistical challenges associated with mobilization, site remediation and demobilization activities;
- Ensure local community and Inuit involvement in the program.

Mobilization of equipment, supplies and personnel will be by Air out of Iqaluit around July  $20^{th}/21^{st}$ . The site assessment work will be completed over about 7 days period and site demobilization will take place about July  $29^{th}/30^{th}$ . Daily flights will be operated between the site and Igloolik/Hall Beach. Bottled water will be used for drinking while on site. Wastes will be removed from the site on a daily basis.

## 4. SOCIAL IMPACT OF THE PROJECT

Wherever possible, the project will adopt solutions tailored to the northern environment and its inhabitants, by using local knowledge and including the unique needs of northerners and their environments in carrying out the environmental site assessment works.

Community stakeholders and local Inuit organizations will be advised of the project plans prior to going on site. A community consultation meeting will be held in Clyde River following completion of this year's site activities. Community consultations will continue throughout the duration of the project to ensure that the community is informed about the activities, results and plans regarding the site and are active participants in the development of the remedial action plan.

As well, meetings to update the Federal and Territorial regulatory bodies are being planned, coincident with the community meetings. Resources for on-going communications have been budgeted for.