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Your file - Votre référence

**1BR-LTU**

Our file - Notre référence

**IQA-N 9545-1**

June 19th, 2006

Phyllis Beaulieu  
Licensing Administrator  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, NU, X0A 1J0

**Re: Transport Canada Environmental Affairs - Land Treatment Unit Project -  
1BR-LTU**

On behalf of the Department of Indian Affairs and Northern Development (DIAND), I have reviewed the Water License Application and support documents submitted by Transport Canada (TC) with respect to the Land Treatment Unit (LTU) Project.

The LTU Project proposes to remove fuel hydrants and piping and treat petroleum hydrocarbon contaminated soil located beneath Apron I at the Iqaluit Airport. TC proposed that the contaminated soil removed from beneath Apron I will be placed in a newly constructed LTU. The hydrants and piping will be inspected and disposed of at the local landfill.

DIAND is pleased to see the information contained in Tech & Tech Proj. Team Proposal Part 2, particularly the attention given to preserving water quality, erosion control and sediment loading.

The excavation as proposed may encounter areas of permafrost. Exposing permafrost may produce water as the ground warms and melts. Any water produced in this manner will need to be disposed of in a fashion appropriate to its chemical composition. Therefore, the possible combination of water production from permafrost and hydrocarbon contaminated soils will require testing of water and soil quality.

In reviewing the Water Licence Application and support documents, there are inconsistencies pertaining to the site for the LTU. The Water License Application (2006), Section 4 states that one should reference the attached documentation for details on the new LTU. In referencing WEIR document (2004) page 11 - Activity 3, "the contractor will establish the location of the LTU with approval from the TCPM and the airport manager at Iqaluit Airport and stake out the perimeter." This section goes on to state "the LTU will be located south and adjacent to the main aviation apron". In observing the Supplementary Information Requirements for Hydrocarbon - Impacted Soil Storage and Landfarm Treatment Facilities (2006), Section III, n"no

**Canada**

water bodies in the vicinity [of the proposed LTU]... the site location previously housed petroleum hydrocarbon tanks which have since been removed and soil remediated.” Referencing the maps provided by the proponent it is not clear where the new LTU unit will be located. In viewing Area Photo #1 the new LTU appears north west of the airport terminal, however due to the angle of the image this assumption may be inaccurate. Thus, DIAND requests more specific information be provided as to the location of the new LTU.

Additionally, material referencing the design of the new LTU is inconsistent. The Water License Application (2006) and the Supplementary Information Requirements for Hydrocarbon - Impacted Soil Storage and Landfarm Treatment Facilities (2006), Section III, both state the LTU will be 100m x 75m with a capacity of 7500m<sup>3</sup>. The Drawings (2004) and the WEIR document (2004) page 11 - Activity 3, however, present the LTU as being 100m x 50m with a capacity of 5000m<sup>3</sup>.

The discrepancies in site location and design details of the LTU appear to stem from chronological changes to the LTU. The most recent documents seem to contradict documents generated earlier. For instance, both the Water License Application (2006) and the Supplementary Information Requirements for Hydrocarbon - Impacted Soil Storage and Landfarm Treatment Facilities (2006) were developed after the WEIR document (2004) and the Drawings (2004). Therefore, to resolve this issue DIAND requests that all documentation be amended to reflect the desired design and location of the LTU.

In reviewing the documentation there is no mention of consultation with the City of Iqaluit, nor is it evident that project information has been made available to the Public. Although, project work has been approved by the Government of Nunavut and will not occur on municipal lands, DIAND feels it is important to address the community in which the proposed work will be conducted.

It appears the LTU Project represents a portion of the proposed work to be conducted at the Iqaluit Airport. The Water License Application submissions in question are; 1BR-LTU, 1BR-UTI and 1BR-IAD. 1BR-LTU deals with the land treatment of hydrocarbon contaminated soils, 1BR-UTI deals with the utilidor removal and 1BR-IAR deals with the reconfiguration of the drainage ditch. DIAND recommends that the Government of Nunavut and Transport Canada submit these projects collectively for one water license and using one project manager, opposed to the current situation where three distinct license applications have been submitted under two distinct applicants.

Should you have any questions or comments, please do not hesitate to contact me at (867) 975-4548 or by email at [BathoryS@ainc-ianc.gc.ca](mailto:BathoryS@ainc-ianc.gc.ca).

Sincerely,

*Original Signed By*

Stephen Bathory  
Regional Coordinator

