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Nunavut Regional Office
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Your file - Votre référence

1BR-UTI

Our file - Notre référence

IQA-N 9545-1 UNC

June 2nd, 2006

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

**Re: Transport Canada - Utilidor Demolition, Removal & Abatement -
Renewal - Iqaluit Utilidor Project**

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 with respect to the Iqaluit Utilidor Project.

The Iqaluit Utilidor Project is part of a proposal to reconfigure the drainage channels due to water ponding on the runway and Aprons from snow melt and rain. The proposed construction will intersect an abandoned utilidor on the airport property. This water license application addresses the need to remove a 110m section of the utilidor, known to contain chrysotile asbestos.

INAC is pleased with the attention given to preserving water quality, particularly with respect to erosion control and sediment loading. Though construction will not take place until water levels have decreased substantially, the project is expected to last several weeks. Thus there is a possibility that water levels could rise due to rainfall. Therefore, erosion and sediment controls should be used preemptively to avoid unanticipated complications due to weather.

Also, working in areas of permafrost will often produce water as the newly exposed ground warms and melts. Any water produced in this manner will need to be disposed of in a fashion appropriate to its chemical composition. Furthermore, due to the location of this project, there is potential to encounter hydrocarbon contaminated soils. Such soils will also need to be disposed of in a manner appropriate to chemical composition. Therefore, the possible combination of water production from permafrost and hydrocarbon contaminated soils will require testing of water and soil quality. These are issues that do not appear to be addressed under license application 1BR-UTI.

Additionally, it seems that project work to be conducted at the Iqaluit Airport has been submitted to the Nunavut Water Board in portions; 1BR-UTI, 1BR-IAD and 1BR-LTU. 1BR-UTI deals with the utilidor removal, 1BR-IAR deals with the reconfiguration of

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the drainage ditch and 1BR-LTU deals with the land treatment of hydrocarbon contaminated soils. INAC recommends that the Government of Nunavut and Transport Canada submit these projects collectively. This would result in one water license and one project manager, opposed to the current situation where three distinct license applications have been submitted.

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.

Sincerely,

Original Signed By

Stephen Bathory
Regional Coordinator

cc- P. Kusugak