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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

File No. 3BC-ALT1015 TR/F

July 10, 2013

Andrew Tam, MSc, PhD (Candidate)
Assistant Environment Officer
8 Wing Trenton Environmental Management Office
74 Polaris Avenue, Room 305
PO Box 1000 Stn Forces
Astra, ON K0K 3W0
Email: Andrew.Tam@forces.gc.ca

Subject: Licence No. 3BC-ALT1015 – Notice of Modification: Modifications and Construction of CFS Alert’s Fuel System and Waste Disposal Facility

Dear Mr. Tam,

On April 25, 2013, the Nunavut Water Board (NWB or Board) received a submission from Department of National Defence (DND) entitled “Notification of proposed Modifications and Construction at the Canadian Forces Station (CFS) Alert” with respect to CFS Alert’s Fuel System and Waste Disposal Facility modifications and construction. The following documents were included with the request:

- Notification letter dated April 18, 2013;
- New Contaminated Soils Landfarm Stamped Drawings dated April 16, 2013; and
- Replace Fuel Piping System POL Compound in Alert Stamped Drawings dated November 15, 2013.

DND is applying for a modification to the Type B Water Licence to replace the existing Fuel Day Tank Compound, connecting fuel pipelines with a new Fuel Day Tank Compound, and to construct a new engineered landfarm facility adjacent to the ALT-10 location.

On May 21, 2013, the NWB distributed DND’s submission to interested parties for a thirty (30) day review. On May 20, 2013, the NWB received comments from Aboriginal Affairs and Northern Development Canada¹ (AANDC) stating that the AANDC is not opposed to the

¹ Letter and Technical Review Memorandum from Ian Parsons, Regional Coordinator, AANDC, to P. Beaulieu NWB; Re: 3BC-ALT1015 – Application for Modification and Construction at Canadian Forces Station (CFS) Alert – Department of National Defence – CFS Alert, dated June 20, 2013.

submitted modification request, and providing recommendations for the Board's consideration. On May 21, 2013, the Board received comments from Environment Canada² (EC) stating that the Federal Guidelines for Landfarming Petroleum Hydrocarbon Contaminated Soils (SAIC, 2005) should be consulted as they contain landfarming specifics including minimum distances from landfarms to surface waters (500 m). The Licensee is also advised to refer to the Canadian Environmental Protection Act (CEPA) Storage Tank System for Petroleum Products and Allied Petroleum Products Regulations that applies to both outside, aboveground and underground storage tank systems (including the piping and other tank associated equipment) under federal jurisdiction containing petroleum and allied petroleum products that have a capacity greater than 230 litres.

Upon review of the request, supporting documentation, terms and conditions in Licence 3BC-ALT1015 and submissions from AANDC and EC, the NWB hereby accepts the notice of Modification and approves (Motion No. 2013-B1-022) the proposed modification as presented in the April 25, 2013 notice and advises DND that:

- The Spill Contingency and Abandonment and Restoration Plans should be updated to reflect the modifications to infrastructure at CFS Alert and submitted to the Board within the 2013 Annual Report.
- The Operations and Maintenance Manual should be updated to reflect the management of the new Landfarm, including but not limited to how contact water is to be managed (including how it will be collected, sampled and discharged) as well as the criteria to which the soil is to be remediated. The updated Manual should be included within the 2013 Annual Report.

The NWB would also like to highlight Licence conditions and requirements that apply to the proposed modification which include:

- Part D, Items 10-14: Conditions applying to Waste Disposal;
- Part F, Item 3: Conditions applying to Modifications and Construction; and
- Part J, Items 1, 7-9: Conditions applying to the Monitoring Program.

Should you have any questions or require any clarification with respect to the above, please feel free to contact the undersigned at (867) 360-6338 Ext. 35 or by email at k.kharatyan@nunavutwaterboard.org.

Sincerely,

Original Signed By:

Karen Kharatyan
Technical Advisor

Attachment: Comments AANDC, EC
Cc: Distribution list - Qikiqtani

² Letter from Jane Fitzgerald, Environmental Assessment Coordinator, EC, to P. Beaulieu NWB; Re: 3BC-ALT1015 – Request for Modification and Construction, dated June 21, 2013.