



Défense National
nationale Defence

8 Wing Environmental Management
8 Wing Trenton
74 Polaris Avenue, Room 305
PO Box 1000 Stn Forces
Astra, ON K0K 3W0

1262-1 (AEnvO)

17 May 2011

NWB Licence: 3BC-ALT1015

Phyllis Beaulieu
Manager of Licensing,
Nunavut Water Board
P.O. Box 119
Gjoa Haven, Nunavut X0B 1J0

SUBJECT: 8 WING ENVIRONMENTAL MANAGEMENT RESPONSE TO
ENVIRONMENT CANADA'S COMMENTS AND RECOMMENDATIONS

Dear Ms. Beaulieu,

8 Wing Environmental Management appreciates the opportunity to respond and provide comments on the water licence issues presented by Environment Canada (EC) Environmental Protection Branch regarding the Operation and Maintenance (O&M) Plan for 3BC-ALT1015.

This letter will provide supplementary information and address the points raised by EC:

Operation & Maintenance Plan

Section 2.3

Given the remote location of Canadian Forces Station (CFS) Alert, Station personnel do not have practical ways to determine the weight and composition of solid waste. Station personnel may track solid waste generated at the station by implementing a physical count of waste bags produced.

Early in 2011, Station personnel began returning solid waste, generated by the Station, to Canadian Forces Base (CFB) Trenton. This measure has reduced the volume of material sent to the local landfill.

Section 4.1

8 Wing Environmental Management can revise the O&M Plan, on an annual basis, to include dimensions, distances to nearest water body, and distances to the nearest airfield for Dump#3 and the Battery Dump.

Section 4.2

Materials that can be safely incinerated are disposed of using an approved incinerator. Please review the enclosed Environment Canada correspondence.

Section 7.3

8 Wing Environmental Management will adhere to the current parameters, as listed under NWB Licence 3BC-ALT1015. 8 Wing Trenton would like to respectfully remind the NWB of the challenges in obtaining and shipping time-sensitive samples from remote locations, such as CFS Alert.

Hazardous Material Management Plan (Sections 32 and 38)

8 Wing Environmental Management would like to clarify that the HazMat Barrel Farm and Hazmat Barrel Compound serve as a staging area for barrels awaiting packaging for air transportation to 8 Wing Trenton. As of January 2011, all ash generated from the incinerated batteries, which were stored in 45-gallon drums, is now backhauled to 8 Wing Trenton for disposal. The staging areas are expected to be reviewed for possible closure during the summer of 2011.

To clarify the reference: “IDA”, “IDA” is the military identification call-sign for this specific High Arctic Data Communication System (HADCS) site.

QA/QC Plan (Section 2.2 Sampling Parameters)

8 Wing Environmental Management will adhere to the current parameters, as listed under NWB Licence 3BC-ALT1015.

Spill Contingency Plan (Appendix D)

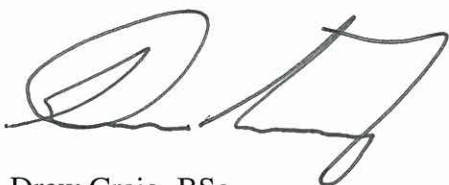
As indicated in the Spill Contingency Plan, Department of National Defence operates an internal Departmental spill reporting procedure (SpillNet) for all spills of oil, fuel, or other deleterious materials, of any size. For practicality, all spills above the established criteria presented in the Plan, or any spills that occur or impact water bodies are reported to the NWT-NU 24-hour Spill Line. 8 Wing Environmental Management continues to report spills to stakeholders in a timely manner.

CFS Alert Station personnel will not conduct refuelling activities below the high water mark of any water body. This measure prevents hydrocarbons from entering water bodies frequented by fish.

The Spill Contingency Plan will be posted at designated areas at CFS Alert for accessibility by Station personnel.

Should you have any further questions or comments, please do not hesitate to contact me.

Yours truly,

A handwritten signature in black ink, appearing to read 'Drew Craig', with a stylized, looped flourish at the end.

Drew Craig, BSc
Wing Environmental Officer
8 Wing Trenton Environmental Management Office

Enclosure: 2

Distribution List

Lieutenant-Colonel Sean Lewis, 8 Wing Logistics and Engineering Officer – DND, 8 Wing Trenton
Major Robert Tucker, 8 Wing Alert Management Officer – DND, 8 Wing Trenton
Major Denis Letellier, Commanding Officer – DND, CFS Alert
Scott Edwards, A4 CE Environment & Hazmat – DND, 1 Canadian Air Division
Douglas Craig, D Air Prog 3-5 Environment – DND, Chief of the Air Staff
Andrew Tam, Assistant Environment Officer – DND, 8 Wing Trenton