



Water Resources Division
Nunavut Regional Office
Iqaluit, NU X0A 0H0

Our File: 9545-2 / CIDMS 147302

Your File: 3BC-ING

May 9, 2007

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Licensing Trainee
Nunavut Water Board
Gjoa Haven, NU X0B 1J0

Re: 3BC-ING / Eric Tapatai / Turaavik Outpost Camp / licence application

On behalf of Indian and Northern Affairs Canada (INAC) I have reviewed the above-mentioned application. The following specialist advice has been provided pursuant to INAC's mandated responsibilities for the enforcement of the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* (NW&NSRT), *Arctic Waters Pollution Prevention Act* (AWPPA), and the *Department of Indian Affairs and Northern Development Act* (DIAND Act).

Eric Tapatai is applying for a Type B licence application for the Turaavik Outpost Camp. This camp is situated in the vicinity of the Hamlet of Baker Lake and will be used to provide a safe, positive learning environment for residents referred to it for treatment by the Department of Justice of the Baker Lake Justice Committee. The Turaavik Outpost Camp can accommodate twenty (20) people and is equipped with two (2) housing cabins, one (1) cabin for kitchen, dining, and learning activities, and one (1) storage shelter. Freshwater will be acquired from the Prince River and stored in a 205 litre plastic drum. Sewage will be disposed of in sumps during summer months and will be brought to the Hamlet of Baker Lake for treatment in winter months. According to the submitted licence questionnaire, solid waste, hazardous waste, and gray water will be brought to the Hamlet of Baker Lake for appropriate treatment.

Indian and Northern Affairs Canada recommend that the Nunavut Water Board consider the following comments when reviewing this licence application.

LOCATION

- 1 The proponent should clearly describe the Turaavik Outpost Camp's location, in relation to the Hamlet of Baker Lake and nearby freshwater sources. The submitted licence application references different positions in relation to the Hamlet of Baker Lake and the Prince River. The Supplementary Questionnaire states that the camp is located 17 kilometres (km) east of the Hamlet of Baker Lake, one (1) km away from the Prince River, and situated on the shore of Baker Lake. The Licence Application Form states that the camp is located 30 km east of Baker Lake. The

Turaavik Outpost Camp Project Summary sheet states that the camp is located 17 km east of the Hamlet of Baker Lake and two (2) km from the mouth of the Prince River.

SPILL CONTINGENCY PLANNING

- 2 All hazardous materials (i.e., fuel and oil products) should be stored in a designated area that is situated at least 30 metres away from the high-water mark of nearby freshwater sources. Furthermore, some form of secondary containment should be used when storing hazardous materials on-site.
- 3 Spill prevention measures such as the use of spill trays when transferring fuel to equipment should be practiced.
- 4 A stand-alone Spill Contingency Plan specific to the Turaavik Outpost Camp should be developed and made available for review. The current spill plan does not suffice. The proponent should review the Guidelines for Contingency Planning prepared by the Northwest Territories Water Board in 1987. These guidelines are available from the Nunavut Water Board's public registry.
- 5 A revised Spill Contingency Plan should include emergency contact information for the Government of Nunavut 24-hour Spill Report Line, INAC Water Resources Officer, and spill response coordinator.
 - The 24-hour Spill Report Line telephone number is (867) 920-8130. A copy of the Spill Report form is available from the Nunavut Water Board's public registry. This form should be included in the Spill Contingency Plan.
 - INAC's Water Resources Officer is based out of Iqaluit and can be contacted by telephone at (867) 975-4289. His name is Andrew Keim.
 - A 24-hour telephone contact number for the person(s) responsible for spill response measures should be provided. This will ensure that employees who discover hazardous material spill can activate an appropriate response and provides a point of contact for the INAC Water Resources Officer.
- 6 A revised Spill Contingency Plan should include (a) detailed response procedures for hazardous material spill on applicable environmental media (i.e., snow, water, ice, tundra, and muskeg); (b) a schematic diagram of the camp and its surrounding area. This diagram should label project infrastructure. Base contour lines, freshwater sources (i.e., Prince River and Baker Lake), fuel cache(s), spill response equipment storage areas, True North indicator (i.e., arrow), legend, and be of an appropriate scale; and (c) applicable Material Safety Data Sheets.

WASTE TREATMENT

- 7 The proponent should provide the Nunavut Water Board a copy of a signed agreement with the Hamlet of Baker Lake to use municipal infrastructure for the treatment of camp wastes, which include sewage, gray water, solid wastes, and hazardous wastes. INAC recommends that all hazardous wastes be treated at an approved facility.
- 8 All sewage and domestic gray water generated at the camp during summer months should be discharged into adequately sized sumps positioned at least 30 metres away from the high water mark of nearby freshwater sources.

ABANDONMENT AND RECLAMATION PLANNING

- 9 A stand alone Abandonment and Reclamation Plan specific to the Turaavik Outpost Camp should be developed. This Plan should provide seasonal and final shutdown procedures. INAC recommends that closure procedures specific to project infrastructure, sewage and gray water treatment sumps, and fuel cache areas be presented.

Indian and Northern Affairs Canada requests notification of any changes in the proposed project, as further review may be necessary. Please do not hesitate to contact me should you have any questions or comments with regards to the foregoing. I can be reached by telephone at (867) 975-4555 or by email at abernethyd@inac-ainc.gc.ca.

Sincerely,

ORIGINAL SIGNED BY

David W. Abernethy

Cc. Jim Rogers, Manager of Water Resources – Indian and Northern Affairs Canada,
Nunavut Regional Office