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Department of Environment

Ministère de l'Environnement

June 15, 2009

Phyllis Beaulieu Manager of Licensing Nunavut Water Board

via Email to: licensing@nunavutwaterboard.org

RE: 3BM-YRB0308 Resolute Bay Airport Terminal Renewal Application

The Government of Nunavut, Department of Environment (DOE) has reviewed the Resolute Bay Airport Terminal Renewal Application. DOE has the following comments and recommendations to make based on the Environmental Protection Act.

A. Solid Waste Disposal

DOE noted that the proponent intention is to construct a new fence for solid waste disposal site. However, before the approval of this licence, DOE recommends that the proponent provide more information about design and timelines of the new fence.

The proponent should advise the NWB whether the historical solid waste disposal facility is open or closed. If the historical site has been closed, then the proponent has to provide closure and reclamation plan to the NWB.

The proponent should prepare an Abandonment and Restoration Plan for the new solid waste disposal facility and the historical facility. The <u>A&R Plan</u> should include the following items;

1. Description of area and site:

A brief description of the site should be included in the A&R plan. The description should include previous history of the site, also including the location (coordinates), type of exploration, and approximate area being disturbed. The location of chemical storage facilities should be included in the description so that more focus can be placed on these areas when looking for contaminated soils.

2. Contact Information:

• The proponents contact information, as well as emergency contact information should be included in the plan.

3. Chemical Removal/Disposal:





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• Chemicals that have been stored on site should be removed from the site. Dispose off chemicals according to territorial and federal regulations.

4. Waste Oil/Waste Fuel Disposal:

 Waste oil and waste fuel should be removed and returned for recycling when the land use activity is completed. Alternative methods of disposal that provide and equivalent level of environmental protection will be considered on a case by case basis.

5. Used Drums:

• Used fuel and oil drums should be removed from the site, returned for deposit, or reused.

6. Location of Hazardous Materials:

 Hazardous materials stored on-site should be marked so they will be visible under all conditions, in all seasons. This recommendation is intended to help prevent possible injuries to camp personnel and/or damage to the containers. Unless otherwise specified by the land use inspector or license -issuing agency, all hazardous materials should be removed from the site upon completion of the activity. All hazardous waste should be accompanied by hazardous waste manifests with the appropriate information (Generator number, carrier number, and receiver number).

7. Contaminated Soils:

Soil contaminated by fuel (e.g., soils under an old storage tank) should be treated
on site or removed to an approved disposal site and replaced with new soil. Soils
in the vicinity of fuel and/or chemical storage should be tested and disposed off if
necessary.

B. Sludge Waste Management

The proponent included in their application that excess sludge removed and placed in a lined and bermed area. However, it is not clear where the berm area is located. The proponent should clearly advise the NWB where the removed sludge will be placed and provide a stand-alone sludge management plan prior to approval of the licence.

C. Monitoring Program

As Part of the Water Licence's (3BM-YRB) requirements, the proponent is to implement the Quality Assurance/Quality Control Plan. The purpose of the QA/QC Plan is to ensure





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that samples taken in the field as part of the Monitoring Program will maintain a high quality, so as to accurately represent the physical and chemical nature of the samples being taken. However, the proponent has not yet submitted any samples' results to the NWB.

Prior to any renewal, the NWB should require that sampling be conducted, and the results be provided. The licensee should submit a Sampling and Monitoring Plant to ensure compliance with the water license.

D. Spill Contingency Plan:

- The date the contingency plan was prepared.
- The name and address of the person in charge of management or control. Managing the facility is an on-site person's responsibility. This person would be initially responsible for clean up activities.
- A description of the facility including the location, size and storage capacity. This is important if persons are unfamiliar with the facility or area. The description could include a map and/or diagrams.
- A description of the type and amount of fuels and chemicals normally stored on site.
- All chemicals should be stored in a safe and chemically-compatible manner, a minimum of 90 feet from all bodies of water.
- Material safety data sheets (MSDS) should be provided for each chemical and be posted in a central location; accessible by all camp personnel.
- A description of the training provided to employees to respond to a spill. A sound training program is necessary when dealing with an emergency situation
- An inventory, the location of response and clean up equipment available to implement the plan. This includes your equipment as well as any to be used by another person responding to the spill on your behalf.

DOE thanks the NWB for the opportunity to provide comments on the Resolute Bay Airport Water Licence (3BM-YRB) renewal application. Please contact us if you have any further questions.





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Yours sincerely,

Original signed by

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