



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

24 January 2018

Licensing Department,  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, Nunavut X0B 1J0

**Re: DND RESPONSE TO THE INAC LETTER: COMPLETENESS  
ASSESSMENT OF TYPE 'A' WATER LICENCE APPLICATION – CANADIAN  
FORCES STATION ALERT (WATER LICENCE 8AC-ALT----)**

Dear Licensing Department,

The Department of National Defence (DND) - 8 Wing Trenton Environmental Management Office is providing this response letter to the INAC comments for the Completeness Assessment of the Type 'A' Water Licence application for CFS Alert, Nunavut, (Water Licence# 8AC-ALT----).

DND - 8 Wing Trenton Environmental Management Office apologizes for the delay in response due staff shortage and unanticipated staff turn-over. I appreciate the patience of the NWB and INAC in assisting with this collaborative approach to support the water licence renewal process for CFS Alert.

DND - 8 Wing Trenton Environmental Management Office Responses to the General Comments:

- 1) Regarding Paragraph 2: Proposed Water Use. DND accepts the comment by INAC for the proposed proactive water usage of 875 m3/day.
- 2) Regarding Paragraph 3: Sewage Treatment System. DND is in the process of preparing the 2016 Annual Report which contains a copy of the 2016 Wetland Report. A copy was provided to the INAC Inspection Team in June 2017. Furthermore, DND is preparing the 2016 and 2017 Annual report in concurrence. Both annual reports will be submitted to the NWB by 31 March 2018.
- 3) Regarding Paragraph 4: Lack of specific information in management plans. DND would like to inform the NWB that it is difficult to have a specific and detailed information on military operations, such as frequency of disposal. CFS Alert is serviced only by military aircraft and flight. Due to the restrictions by ECCC via the Interprovincial Movement of Hazardous Waste Regulations (2002), DND cannot utilize the routine and weekly

sustainment flights to backhaul manifested hazardous wastes as the flight path lays over at the United States Air Force Base in Thule, Greenland. DND is committed to hazardous waste removal and will issue special domestic (Canada-only) flights, and these cannot be forecasted. Pending the Technical Review, DND is committed to review and incorporate additional INAC comments on spill response tailored for snow, ice and open water, if feasible.

- 4) Regarding Paragraph 5: Licence term. DND accepts and agrees with the proposed 10 years Water Licence term. DND believe this longer term will be best managed by amendments in the future.

DND - 8 Wing Trenton Environmental Management Office Responses to the Information Request:

- 5) Regarding Paragraph 1: Abandonment and Restoration or Temporary Closing. DND has no intent to abandon or temporarily close CFS Alert as it is a year-round active military defence establishment. DND disagrees with the INAC comment to provide more detailed and specific information on waste disposal areas that are not currently being used as the management of those sites are also under the Federal Contaminated Sites Action Plan (FCSAP) – 10 Steps approach. If supported by the NWB, DND will add clarification in the general Abandonment and Restoration Plan of the DND's commitment to transfer closed waste disposal sites into the FCSAP.
- 6) Regarding Paragraph 2: Sludge Management Plan in Operations and Maintenance (O&M) Plan Manual. The Sewage Treatment Facility at CFS Alert is a passive wetland facility; therefore passive management of sludge is the ongoing regime. If supported by the NWB, DND will add clarification in the O&M Plan.
- 7) Regarding Paragraph 3: Stand alone management plans. DND disagrees with the INAC comment for stand alone management plans. The current O&M Plan is an integrative approach where all management plans support the O&M Plan, which reflect actual operations. If the requirement for stand alone management plans is a preference for the ease of review, the DND requests that the management plans remains integrated and not stand alone.
- 8) Regarding Paragraph 4: 2015 Annual Report. The 2015 Annual Report was submitted to the NWB in compliance with the Water Licence. DND noticed upon access to the Public Registry that the 2015 Annual Report was filed in a difference folder. For CFS Alert, the following folders are relevant: 3BC-ALT1015 and 8AC-ALT----. Furthermore, DND is preparing the 2016 and 2017 Annual report in concurrence. Both annual reports will be submitted to the NWB by 31 March 2018.

- 9) Regarding Paragraph 5: Fuel Management Plan. DND would like to request additional clarification on the requirement and specific content of a Fuel Management Plan, and the difference between the Spill Contingency Plan, or if a paragraph on Fuel Management is acceptable within the SCP.
- 10) Regarding Paragraph 6: Water Management Plan. DND would like to request additional clarification on the requirement and specific content of a Water Management Plan. DND does not believe such a document would have usefulness as it would be a reiteration of the same description information that is included in the General Considerations of the Water Licence. The Water Licence and the O&M Plan provides details of the operating systems at CFS Alert which should be sufficient for the NWB. DND would like to remind the NWB that all plans are publicly visible online on the Public Registry, therefore Defence Establishment infrastructure systems should not be made readily available.
- 11) Regarding Paragraph 7: COD and BOD5 at the Sewage Treatment Facility. DND would like to inform the NWB that we have been successful since 2011 to collect and meet holding times to have meaningful results of BOD5, with the current QA/QC Plan in effect. The requirement of the developing a COD relations to BOD5, as proposed at the beginning of the CFS Alert Water Licence, is no longer required as DND can obtain BOD5 results.

DND - 8 Wing Trenton Environmental Management Office is committed to work with the NWB and INAC; we are supportive of any teleconferences and technical meetings to collaboratively help establish an appropriate Water Licence for CFS Alert.

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

Yours truly,



Andrew Tam, PhD.  
8 Wing Environment Officer  
8 Wing Trenton Environmental Management Office  
Department of National Defence  
(613) 965-3930  
Andrew.Tam@forces.gc.ca