



Richard Dwyer &lt;richard.dwyer@nwb-oen.ca&gt;

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## RE: 8AC-ALT---- Pre-Hearing Conference Decision - DND Commitments Partial Submissions

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Andrew.Tam@forces.gc.ca &lt;Andrew.Tam@forces.gc.ca&gt;

Fri, Dec 21, 2018 at 9:38 AM

To: richard.dwyer@nwb-oen.ca, licensing@nwb-oen.ca

Cc: Tom.Gardner@forces.gc.ca, derek.donald@nwb-oen.ca, NATHAN.KOUTROULIDES@forces.gc.ca,

KATHRYN.JOHNSTON@forces.gc.ca

Good morning Richard,

In compliance to the DND Commitments listed in the Pre-Hearing Decision Appendix C; three items are due soon (#1 due 31 Dec 18; #3 due 04 Jan 19; and #5 due 31 Dec 19).

**Regarding Commitment #1** – “DND provide options under consideration for the packaged sewage treatment system” to CIRNAC and ECCC; **DND would like to request an extension to 28 Feb 2019** as the third party group providing the Options Analysis is unable to deliver the technical memo by 31 Dec 2018, and it is likely to be submitted in the new year. If this document is received sooner than 28 Feb, DND is committed to submitting the package “as-is” immediately. Reminder note: DND reserves the rights to make the final selection of an option that is best for our infrastructure projects and systems.

Would the NWB be in support of this extension request for Commitment#1?

**Regarding Commitment #3** – “Snow and Ice Control/Management Plan for the site (including the tank farm)” to CIRNAC; **Please find attached the SNIC Plan** in .doc format.

Note, there are no snow removals within the tank farms at CFS Alert due to safety during the harsh winter/darkness season; also the climate of Alert is a polar desert, with limited snow precipitation and the majority of snow accumulation driven by wind drift. Access to the tank farm is restricted to the general public, except for the fuel technicians.

**Regarding Commitment #5** – “DND to provide information regarding spill response [a], mobile water treatment [b], and discharge procedures if water is found in containment surrounding storage tanks [c]” to CIRNAC.

Attached information:

- a. Spill response for storage tanks, an example of the Emergency Response Plan (Environmental Emergency Plan, E2P for Petroleum and Allied Petroleum Products), designed in collaboration with ECCC Enforcement and Compliance Promotions is **attached for the main tank system: EC00002535 E2P**.
- b. **Attached O&M for the mobile water treatment unit (5GPM P&T)** with an activated Alumina filtration unit (55WAT) addition for Lead (metals) filtration.

c. Although a formal discharge procedure is not written, an annual reminder note is submitted by DND 8 Wing Environment to DND CFS Alert as a routine reminder and direction for discharge procedures, with advice should contaminants are found and the usage of the mobile water treatment system, for secondary containment waters. This is done in management of secondary containment water in compliance to CEPA Storage Tanks Regs and the NWB Water Licence conditions. Emails of procedures / DND Directions to Station Technical Staff are attached as an example. An excerpt in the Contractor Statement of Work conditions to regulate secondary containment waters is also attached in .jpg format.

If the NWB and the parties required additional info or if there are technical problems with the files, please do not hesitate to reach out to me.

Happy holidays!

Regards,

Andrew

Andrew Tam, PhD.

8 Wing Environment Officer, Environmental Management

Department of National Defence / Government of Canada

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**From:** Richard Dwyer [mailto:[richard.dwyer@nwb-oen.ca](mailto:richard.dwyer@nwb-oen.ca)]

**Sent:** November 6, 2018 6:54 PM

**To:** Tam A@CFB Trenton WENV@Trenton <[Andrew.Tam@forces.gc.ca](mailto:Andrew.Tam@forces.gc.ca)>; Gardner Maj TJ@ADM(IE) RPO(North)@Ottawa-Hull <[Tom.Gardner@forces.gc.ca](mailto:Tom.Gardner@forces.gc.ca)>

**Cc:** [licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca)

**Subject:** 8AC-ALT---- Pre-Hearing Conference Decision

Good afternoon,

The logo of the Nunavut Water Board is a circular emblem. It features a yellow sun with rays at the top, a white polar bear in the center, and blue wavy lines representing water at the bottom. The words "NUNAVUT WATER BOARD" are written in a circle around the top, and "ALONG WITH US" is written along the bottom. Two crossed paddles are visible behind the emblem.

<https://mail.google.com/mail/u/0?ik=6a382f141f&view=pt&search=all&permmsgid=msg-f%3A1620480182610909702&simpl=msg-f%3A162048018261...> 3/6

b. Please provide a photo of your discharge methods when this is being performed.

If I receive advanced approval from our external regulators, Crown Indigenous Relations and Northern Affairs Canada (CIRNAC, formerly INAC/AANDC) prior to 23 Jul 18, I will inform you immediately.

Thank you again for your cooperation.

Regards,  
Andrew

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-----Original Message-----

From: Tam A@CFB Trenton WENV@Trenton

Sent: July-13-18 9:27 AM

To: 'Jonathan Mesher' <[Jonathan.Mesher@aandc-aadnc.gc.ca](mailto:Jonathan.Mesher@aandc-aadnc.gc.ca)>; 'Monteith, Joseph (AADNC/AANDC)' <[joseph.monteith@canada.ca](mailto:joseph.monteith@canada.ca)>

Cc: Erik Allain <[Erik.Allain@aandc-aadnc.gc.ca](mailto:Erik.Allain@aandc-aadnc.gc.ca)>

Subject: 8AC-ALT---- - CFS Alert - Berm Secondary Containment Water Discharge Approval Request

Importance: High

Hello Jonathan and Joseph;

Attached is the lab analytical results of the water grab samples obtained during the June & July 2018 Surveillance Monitoring Program at CFS Alert, Nunavut.

The berm water results at the Lower Airfield Tank Farm (ALT-8, -8.1) and the Upper Tank Farm (ALT-9) are compliant to the Effluent Quality Limits of the Alert Water Licence, as per Part D, Item 11. Note: Given the large size of the ALT-8 facility, ALT-8.1 is a second grab sample to ensure representation.

The berm water results for Day Tank (ALT-10) is NOT compliant to the Effluent Quality Limits of the Alert Water Licence, as per Part D, Item 11, as Lead was the only parameter that was non-compliant at 6.1 ug/L (limit is 1.0 ug/L); the other parameters were compliant. For the small volume of water residing in ALT-10, DND has no intentions to discharge the water and the small volume should evaporate by the end of August in Alert's polar desert climate.

As per the condition of Part D, Item 14, I am providing DND's intent to discharge the effluents from the ALT 8 & ALT-9 fuel tank farms within 10 days; however, to help expedite the process and given Alert's short outdoor summer season, may I please request your approval to discharge the effluents from these two facilities as soon as possible?

I will also issue DND direction the CFS Alert staff responsible for the water discharges to ensure that no ruts in the tundra are created and to ensure that sediment erosion protections are taken.

Thank you for your assistance.

Regards,  
Andrew

Andrew Tam, PhD.

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----- Forwarded message -----

From: <[Andrew.Tam@forces.gc.ca](mailto:Andrew.Tam@forces.gc.ca)>  
To: <[AlertSiteMgr@forces.gc.ca](mailto:AlertSiteMgr@forces.gc.ca)>, <[AlertSCEO@forces.gc.ca](mailto:AlertSCEO@forces.gc.ca)>, <[AlertZippo@forces.gc.ca](mailto:AlertZippo@forces.gc.ca)>, <[Alertbldginsup@forces.gc.ca](mailto:Alertbldginsup@forces.gc.ca)>  
Cc: <[AlertSLogO@forces.gc.ca](mailto:AlertSLogO@forces.gc.ca)>, <[AlertCO@forces.gc.ca](mailto:AlertCO@forces.gc.ca)>  
Bcc:  
Date: Wed, 7 Jun 2017 18:17:17 +0000  
Subject: Water in Fuel Tank Farm Berms (secondary containments) at CFS Alert

Good afternoon Boss Beaver and Site Manager,

As per CFS Alert's water licence and a reminder on the annual procedures, **please do not discharge and pump out any waters** contained in CFS Alert's fuel storage tank farm berms (Lower Tank Farm berms, Upper Tank Farm berms , and the Day Tank berm). The water must be sampled and tested, and then approved by our external Regulators before DND (8 WEnv) can permit the Station to begin any discharges.

The 8 WEnv Team will be arriving on the week of 19 June to collect this water sampling and to provide further directions on site.

The external Regulators will be inspecting the Station on 24-25 June to verify the Station's Water Licence compliance.

Thank you,

Andrew

Andrew Tam, PhD.

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7 attachments

**DND Commitment5-CFS Alert Contractor SOW Dyke Pumping Conditions  
excerpt.jpg**

**5.2.2.2. Fuel Systems Dike Pumping**

Before any dike is pumped, notification is required to EWing Environment as soon as possible to obtain approval from the Nunavut Water Board and RMC Inspector as dike water is now a controlled and regulated substance where the disposal (pumping) requires approval. As of 2023, testing occurs before pumping.

EWing Environmental Management conducts the testing and pays for the analysis as per management of the Nunavut Water Board (owner). After receipt of the analytical results a 24-hour notice is required for the RMC Inspector for the intent to pump dike water. If water is contaminated, the contractor shall as BMD's water filtration system at CFS Alert to pump the dike with water testing at the beginning, middle and end of the pumping process. This pumping should be conducted in the presence of EWing Environment staff.

59K

**DND Commitment5-EC00002535 E2P - 2018.pdf**

1504K

**noname.eml**

12K

**DND Commitment3-CFS\_Alert\_SNIC\_Plan\_Annual\_Revision\_-\_updated\_July\_2017.doc**

968K

**DND Commitment5- 5GPM P & T Manual.pdf**

6091K

**noname.eml**

7K

**DND Commitment5-55WAT-CSI.PDF**

339K