



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

22 August 2019

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

**Re: DND RESPONSE TO THE CIRNAC LETTER: CROWN-INDIGENOUS
RELATIONS AND NORTHERN AFFAIRS CANADA (CIRNAC) FINAL
WRITTEN SUBMISSION FOR TYPE 'A' WATER LICENCE APPLICATION,
8AC-ALT--- CANADIAN FORCES STATION ALERT PROJECT;
DEPARTMENT OF NATIONAL DEFENCE-8 WING TRENTON
ENVIRONMENTAL MANAGEMENT OFFICE.**

Dear Licensing Department,

The Department of National Defence (DND) - 8 Wing Trenton Environmental Management Office is providing this response letter to the CIRNAC Technical Review Memorandum Comments for Type 'A' Water Licence application, 8AC-ALT---, Canadian Forces Station Alert Project dated June 18, 2019.

DND - 8 Wing Trenton Environmental Management Office appreciates the dedicated efforts of the NWB and the constructive recommendations by CIRNAC to collaborate and support the water licence renewal process for CFS Alert.

DND - 8 Wing Trenton Environmental Management Office's responses to the CIRNAC Technical Comments (TC). For the purposes of this letter only partially resolved or unresolved items will be addressed as indicated in their above noted Memorandum:

- 1) **Regarding TC 3.1:** "It is not clear from the information provided whether DND is responsible for the abandonment and restoration of waste disposal areas not currently being used at CFS Alert, or if these sites fall under the Federal Contaminated Sites Action Plan. CIRNAC recommended that if the waste disposal areas at CFS Alert do fall under the responsibility of DND, that DND provide a date by which they can provide the requested plans. At the technical meeting, DND agreed to provide a reclamation option analysis for abandonment and restoration of historical waste disposal sites/areas within one year of licence issuance, in the form of a desktop analysis technical memo. CIRNAC considers this portion of the comment resolved at this time."

DND Response: DND accepts full responsibilities for the abandonment and restoration of waste disposals areas in Alert. Under the Federal Contaminated Sites Action Plan, DND has currently retained a qualified consultant to assess, delineate and further remediate our contaminated sites. This includes landfills. This is intended to be an ongoing multi-year program with no fixed end date at this time. DND would like to remind CIRNAC that infrastructure and property projects in the High Arctic takes time (years) to plan and action, especially due to the logistical and transportation constraints in being at a remote high arctic location.

Regarding TC 3.2: "CIRNAC now seeks the submission of as-built design drawings to the Nunavut Water Board for the existing solid waste disposal facilities and the landfarm at Canadian Forces Station Alert, to fully resolve this issue."

DND Response: DND does not have detailed design drawings of any of our solid waste disposal facilities as these are legacy facilities currently in use and at the time they were installed drawings were not required.

Please see attached design drawing of the landfarm currently in use at CFS Alert.

- 2) **Regarding TC 6:** "CIRNAC has recently undergone a name change. In Section 5.1.6 of the Spill Contingency Plan, the contact information for AANDC should be updated to Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) Inspector (867-975-4295). Similarly, in Water Licence No. 3BC-ALT1015, INAC should be updated to CIRNAC in Part B, Item 7b. The Spill Contingency Plan has not been updated"..

DND Response: DND will correct and update document at the next revision opportunity.

- 3) **Regarding TC 7:** "...prepare and submit a stand-alone Fuel Management Plan to complement the existing Spill Contingency Plan. Context: CFS Alert has experienced at least two major spills of fuel in recent years, and large amounts of fuel are stored continuously on site. A fuel management plan is a standard requirement for other Type 'A' Water Licences."

DND Response: To demonstrate support to CIRNAC TC 7, DND will revise the Spill Contingency Plan during the next revision opportunity for greater details on our fuel management activities. This will likely be completed during the new license revision. DND would like remind CIRNAC that DND is compliant to Storage Tank Systems for Petroleum Products and Allied Petroleum Products Regulations SOR/2008-197 of the Canadian Environmental Protection Act (1999) for fuel management, secondary containment, inspections, leak detection, piping inspection, and fuel transfer procedures at CFS Alert; and DND is in consistent communication with ECCC regarding storage tank systems compliance.

DND would like to remind CIRNAC that this recommendation (R 6) and scope is the responsibility of ECCC. DND would like to request the NWB that the management of fuels at CFS Alert remain to be regulated by ECCC and not under CIRNAC, but for clarification, DND is conducting these requirements in compliance with ECCC, DND Departmental Policies, Federal Legislations & Regulations. DND will update/develop Spill Contingency Plan/Fuel Management Plan to include at the minimum the items listed in the letter at the next available opportunity.

- 4) **Regarding TC 9:** "CIRNAC considers 5 years excessive to develop and implement a Sewage Sludge Management Plan. As discussed in the technical meeting, CIRNAC expects a desktop version of the Sewage Sludge Management Plan be submitted to the NWB with this Type A water licence application for review by intervenors. Updates to the Sewage Sludge Management Plan, based on fieldwork and actual site conditions, are to be provided within the initial 5-year term of the water licence."

DND Response: DND is supportive of TC 9; currently, DND is conducting a study by the DND/Canadian Forces 1 Engineering Support Unit for the design and addition of a packaged and engineered Sewage Treatment Plant that will be optimized to treat CFS Alert's effluent, prior to discharge into the Sewage Terrace Treatment Facility. As part of this project, a sludge management plan will be requested as deliverables for the operation and maintenance of this future infrastructure capability. Design of the plant is currently underway however, DND would like to remind CIRNAC that infrastructure projects in the High Arctic takes time (years) to plan and action, especially due to the logistical and transportation constraints in being at a remote high arctic location.

Please see attached sewage terrace upgrade draft drawings and briefing note. The intent is to stabilize the banks until the sewage treatment facility can be constructed.

DND - 8 Wing Trenton Environmental Management Office is committed to work with the NWB and CIRNAC; 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,



Nathan Koutroulides B.Sc.

Deputy 8 Wing Environment Officer
8 Wing Trenton Environmental Management Office
Department of National Defence
(613) 392-2811 ext 4821
Nathan.Koutroulides@forces.gc.ca



BRIEFING NOTE FOR RP OPS NORTH

PROJECT 17-ESU-01 ALERT SEWAGE TREATMENT TERRACE – PROPOSED DESIGN

ISSUE

1. Real Property Operations North (PR Ops N) has requested 1 Engineer Support Unit (1 ESU) to develop a design to improve sewage treatment at CFS Alert. Part of the solution is to improve the design of the sewage terrace to control flow and reduce erosion of the slope with the desired result of reduced total suspended solids (TSS) being discharged into Parr Inlet.

BACKGROUND

2. The existing soil consists of silty sand and silty gravel and the slope and berms that comprise the terraces are constructed from this soil. The spring freshet is eroding the slope and destroying existing berms, carrying the soil into the Parr Inlet.

3. The chosen course of action includes a sewage treatment package plant with improvement of the existing sewage treatment terraces to be used as back-up. While a feasible plant solution for sewage treatment is being developed, RP Ops N has requested a preliminary design proposal for terrace improvement.

DISCUSSION

4. By improving construction of the berms with material other than the native silty soil, erosion will be greatly reduced. Reducing erosion through soil retention mechanisms will improve the quality of the water being introduced into Parr Inlet.

5. The design incorporates gabion baskets keyed into the existing soil to allow permafrost to lock it in place. The gabions are to be placed at roughly the same location as the existing berms. Gabion openings will be specified to material the Alert quarry is capable of producing. The dimensions of the openings in the berms will be designed to control the locations of peak flows. These will be created by omitting 3 baskets from the top course at deliberate locations.

6. On the upstream side of the berms and the East side of the ridge, gabion wall with geotextile will be installed and specified to retain the silt while providing enough permeability to allow water to pass through.

7. The first berm adjacent to the outfall was eliminated with the intent of allowing the effluent to flow away from the pipe to increase the time it takes for the forming ice to reach the pipe in the winter.

8. Preliminary design drawings can be found at Annex A.

CONCLUSION

9. This is a proposed preliminary design of the sewage treatment terrace berms. Pending review by RP Ops N, 1 ESU will provide more detail for geotextile and gabion basket specifications.

Prepared by: G.G. McKay, Civil Engineering Technologist 1 ESU, (613) 541-5010 x 7459

Reviewed by: J.S. Kingswood, Capt, Acting OC 15 Engr Sqn 1 ESU, (613) 541-5010 x 7473

Approved by: J.R.M. Comeau, LCol, CO 1 ESU, (613) 541-5010 x 7401

Date Prepared: 05 July 2019

ANNEXES:

Annex A – Preliminary Drawings, CFS Alert Wastewater Terrace



LIST OF DRAWINGS - LISTE DES DESSINS

100 SITING EMPLACEMENT	200 STRUCTURAL STRUCTURE	600 CIVIL CIVIL
ESU-A28-8400-101		ESU-A28-8400-601
ESU-A28-8400-102	ESU-A28-8400-201	ESU-A28-8400-602
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PRELIMINARY
DRAWING

CFS ALERT WASTE WATER TERRACE

CFS ALERT, QIKIQTAAALUK REGION, NUNAVUT, CANADA

FOR REVIEW

SET NO. - SERIE NO.

DATE	2017/07/10
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DCC NO. - CDC NO.

WBS NO - HQ. SRT

PF NO. - NO. DP

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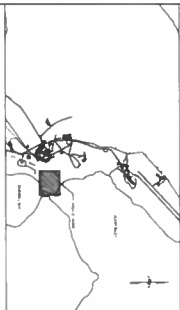
Government of Canada Gouvernement du Canada

LEVEL OF SECURITY | NIVEAU DE SÉCURITÉ

TO BE REVIEWED | À ÊTRE REVISER

Canadă

This design is an improvement of previous work and is protected by a copyright, although the manufacturer has agreed to make the design available to other manufacturers. The design offers many, but not necessarily all, the advantages of the previous design. It is a simple design, easy to use, and it can be used for a wide range of applications. The design is also a simple design, easy to use, and it can be used for a wide range of applications. The design is also a simple design, easy to use, and it can be used for a wide range of applications.



LEGEND - LÉGENDE	
SYMBOL	DESCRIPTION
	UNCONSOLIDATED EARTH
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1. ALL DIMENSIONS ARE MILLIMETRES UNLESS OTHERWISE NOTED

PRELIMINARY
DRAWING

NO.	DATE	REVISION	APPROV.

SCALE | ECHELLE
1" = 20'

0 10 20 feet

LOCATION | EMPLOYMENT
WASTE WATER TERRACE
CFS ALERT
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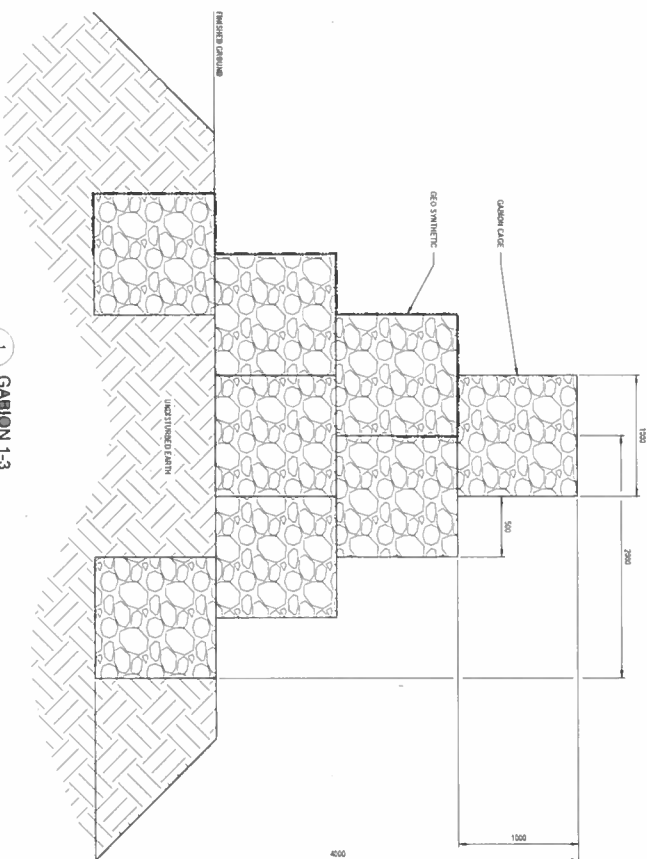
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CFS ALERT
WASTE WATER TERRACE

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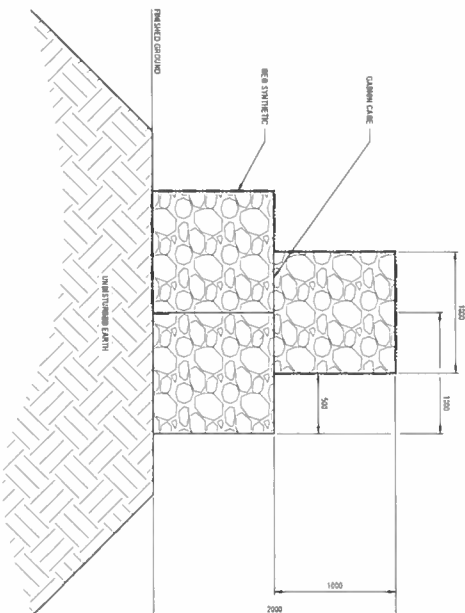
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S.L.C.		
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RP DES NORTH		
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ESU-A28-8400-201

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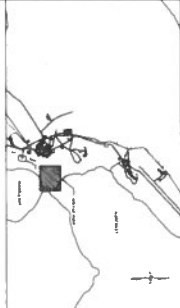


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GABION 4

SCALE: 1/2"

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SYMBOL	DESCRIPTION
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PRELIMINARY
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NO.	DATE	REVISION	APPROVED
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WASTE WATER TERRACE

CFS ALERT

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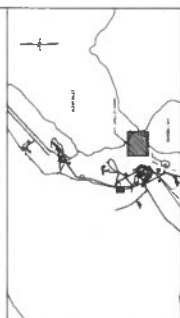
GABION ALIGNMENTS

SCALE 1:500

DUMBELL BAY

LEVEL OF SECURITY / NIVEAU DE SÉCURITÉ
 TO BE REVIEWED / À ÊTRE RÉVISÉ

This design is an improvement of a previous design and is intended to be reviewed by the designer. The designer is responsible for ensuring that the design meets the required standards. The designer is also responsible for ensuring that the design is safe and sound. The designer is also responsible for ensuring that the design is in accordance with the applicable standards and regulations.



SYMBOL	DESCRIPTION
	PROPOSED GROUND
	EXCAVATED GROUND
	EXISTING GROUND

NOTES

- ALL DIMENSIONS ARE METERS UNLESS OTHERWISE NOTED.
- DATE: 17-ESU-01
- DESIGNER: J. KINGWOOD
- PROJECT: CFS ALERT NUNAVUT

PRELIMINARY DRAWING

NO.	DATE	REVISION	APPR.
1	2017/07/10		

LOCATION: EMPLACEMENT
 WASTE WATER TERRACE
 CFS ALERT
 NUNAVUT

PROJECT / PROJET
 WASTE WATER TERRACE
 CFS ALERT

TRADE / MÉTIER
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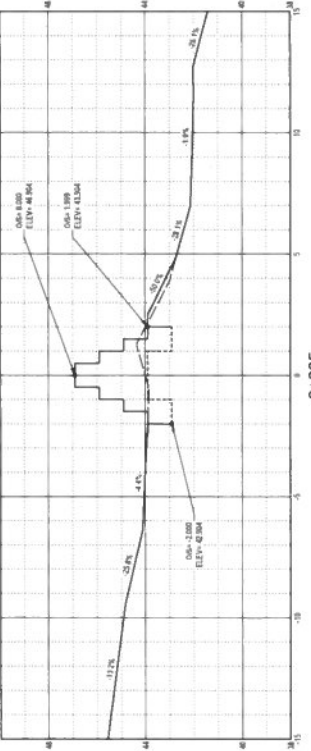
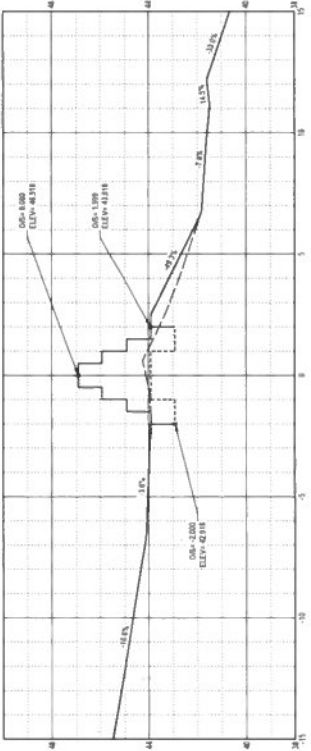
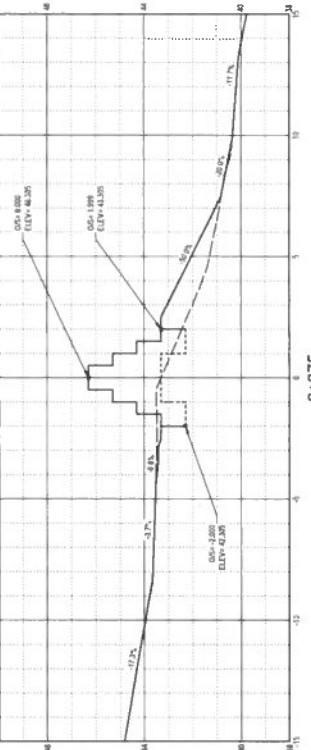
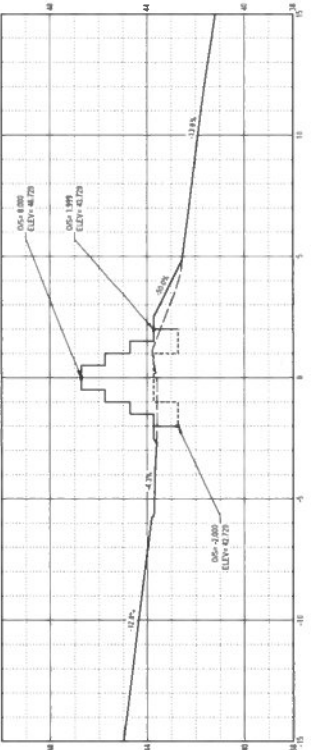
SUBJECT / SUJET
 GABION 1
 SECTION VIEWS
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PRODUCTION	REVIEWED / REVU
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DRAWN / DÉSSINÉ MR. G. MCKAY	DRAWN / DÉSSINÉ J. KINGWOOD
CHECKED / VÉRIFIÉ S.L.C.	CHECKED / VÉRIFIÉ J. KINGWOOD
COORDINATION RP OPS NORTH	COORDINATION J. KINGWOOD
WBS NO. / NO. DTP 17-ESU-01	WBS NO. / NO. DTP 17-ESU-01

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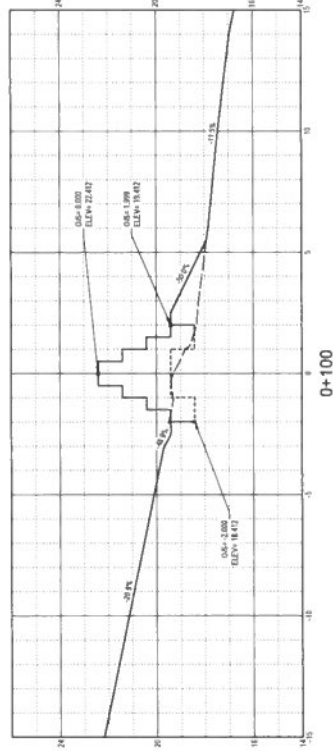
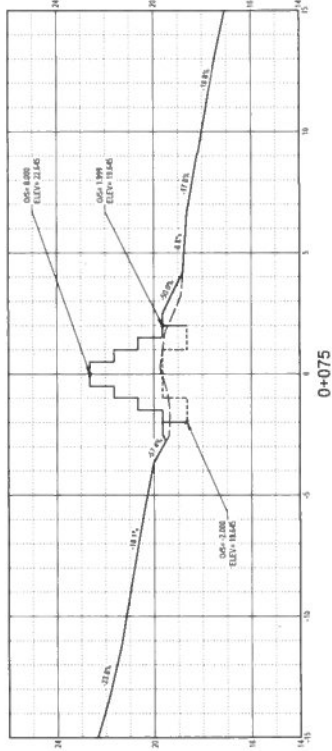
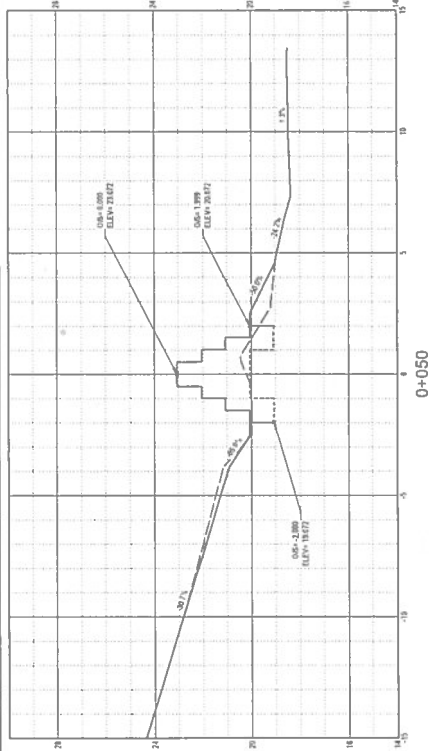
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GABION 1 SECTION VIEWS
 SCALE: HORIZONTAL: 1:100
 SCALE: VERTICAL: 1:100





2 GABION 2 SECTION VIEWS
604 SCALE VERTICAL 1:100

1:100

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LEVEL OF SECURITY / NIVEAU DE SECURITE
TO BE REVIEWED / A ETRE REVISER

This design is an indication of the proposed work and is not intended to be used for construction. It is the responsibility of the contractor to ensure that the design is followed and that the work is done in accordance with the specifications. The contractor is responsible for the safety of the work and for the safety of the public. The contractor is responsible for the safety of the work and for the safety of the public.

LEGEND - LEGENDE

SYMBOL	DESCRIPTION
---	PROPOSED GROUND
---	EXISTING GROUND

NOTES:

- ALL DIMENSIONS ARE METRES UNLESS OTHERWISE NOTED.
- PROPOSED GROUND IS SHOWN BY A DASHED LINE.
- EXISTING GROUND IS SHOWN BY A SOLID LINE.
- ORTHOMETRIC HEIGHTS DERIVED FROM CGVD 2011.

WASTE WATER TERRACE
CFS ALERT
NUNAVUT

CFS ALERT
WASTE WATER TERRACE

DATE
2017/07/10

SUBJECT / SUJET
GABION 2
SECTION VIEWS
STA 0+050 TO 0+100

DESIGNED / ETABLI
MR. G. MCKAY

DRAWN / DRESSE
J. JAL

CHECKED / VERIFIE
S.J.C.

COORDINATION
MR. G. MCKAY

REVISIONS
NO. 1
DATE
17-ESU-01

PRODUCTION
REVIEWED / REVU
MR. G. MCKAY

DESIGNED / ETABLI
MR. G. MCKAY

DRAWN / DRESSE
J. JAL

CHECKED / VERIFIE
S.J.C.

COORDINATION
MR. G. MCKAY

DATE
2017/07/10

SUBJECT / SUJET
GABION 2
SECTION VIEWS
STA 0+050 TO 0+100

DESIGNED / ETABLI
MR. G. MCKAY

DRAWN / DRESSE
J. JAL

CHECKED / VERIFIE
S.J.C.

COORDINATION
MR. G. MCKAY

PRODUCTION
REVIEWED / REVU
MR. G. MCKAY

DESIGNED / ETABLI
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S.J.C.

COORDINATION
MR. G. MCKAY

DATE
2017/07/10

SUBJECT / SUJET
GABION 2
SECTION VIEWS
STA 0+050 TO 0+100

DESIGNED / ETABLI
MR. G. MCKAY

DRAWN / DRESSE
J. JAL

CHECKED / VERIFIE
S.J.C.

COORDINATION
MR. G. MCKAY



LEGEND - LEGENDE	
SYMBOL	DESCRIPTION
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NOTES:

1. ALL DIMENSIONS ARE METRES UNLESS OTHERWISE NOTED.
2. DATUM: WGS 84
3. PROJECTION: UTM ZONE
4. ORTHORECTIC HEIGHTS DERIVED FROM CGVD 1911

PRELIMINARY
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PROJECT | PROJECT

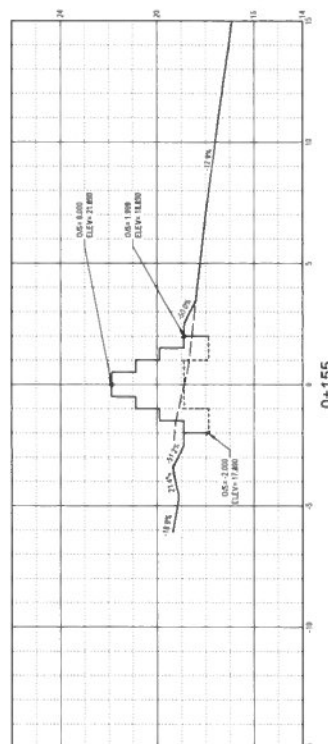
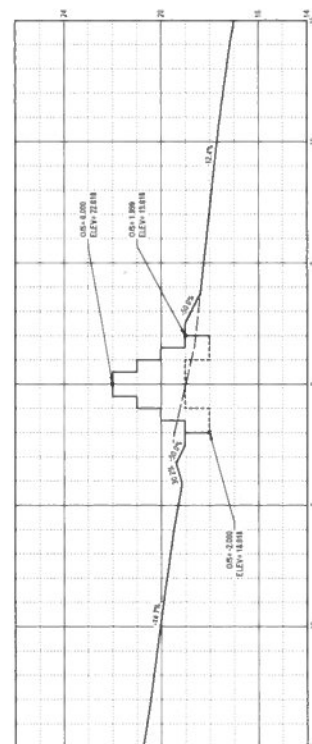
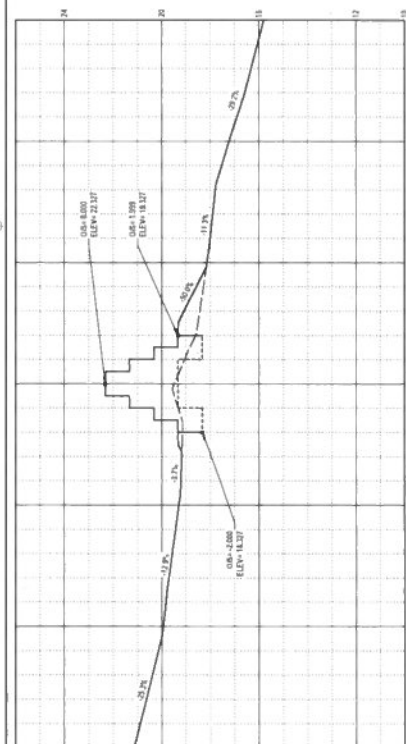
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SUBJECT | SUJET

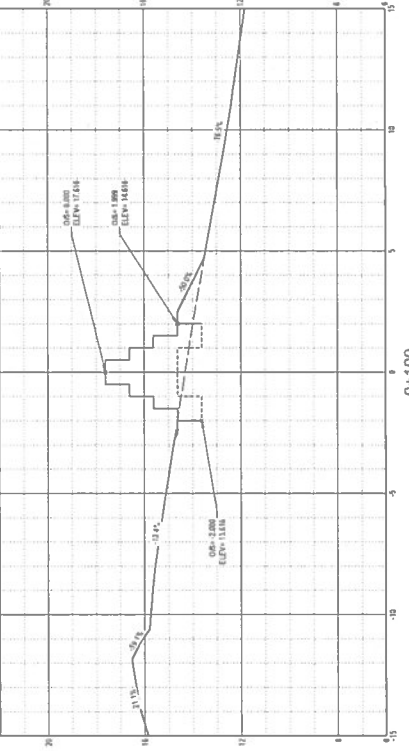
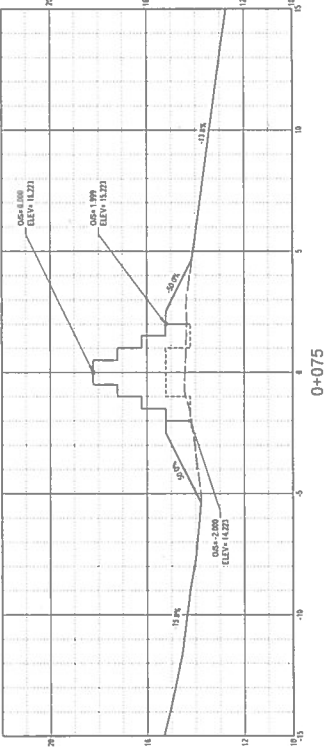
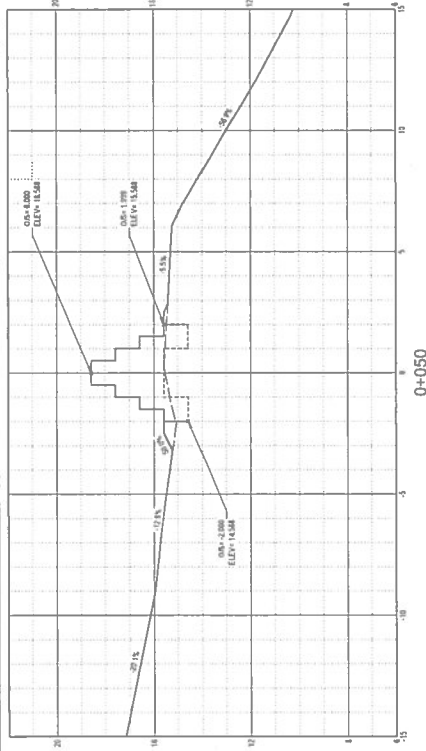
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ALL			PROJ MOR LOFT PROJ
CHECKED (VERIFIE)			MR. G. MCKAY
J.C			DES MOR GUEST CONC
COORDINATION			
POPS NORTH			FIRE INCIDENTS

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WG. NO. NO. DESSIN	ESU-1428-8400-607	

Canada 1-800-762-0700



2 GABION 2 SECTION VIEWS
634 SCALE HORIZONTAL 1:100
SCALE VERTICAL 1:100



3 GABION 3 SECTION VIEWS
SCALE HORIZONTAL 1:100
SCALE VERTICAL 1:100

Government of Canada
Gouvernement du Canada

LEVEL OF SECURITY / NIVEAU DE SÉCURITÉ
TO BE REVIEWED / À ÊTRE RÉVISÉ

This design is an illustration of a concept and is not intended to be used for construction. It is the responsibility of the client to ensure that the design is suitable for the intended purpose. The client is responsible for obtaining all necessary permits and approvals. The client is also responsible for ensuring that the design is in accordance with all applicable laws and regulations.

Cette conception est une illustration d'un concept et n'est pas destinée à être utilisée pour la construction. Il est de la responsabilité du client d'assurer que la conception est adaptée à l'usage prévu. Le client est responsable d'obtenir toutes les permis et approbations nécessaires. Le client est également responsable d'assurer que la conception est conforme à toutes les lois et règlements applicables.

LEGEND - LÉGENDE

SYMBOL	DESCRIPTION
---	FINISHED GROUND
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---	EXISTING GROUND

NOTES:

- ALL DIMENSIONS ARE METRES UNLESS OTHERWISE NOTED.
- PROJECTIONS ARE IN METRES.
- ORTHOMETRIC HEIGHTS DERIVED FROM CNO 2011.
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PRELIMINARY DRAWING

WASTE WATER TERRACE
CFS ALERT
NUNAVUT

WASTE WATER TERRACE
CFS ALERT
WASTE WATER TERRACE

SCALE / ÉCHELLE
AS NOTED

LOCATION / EMPLACEMENT
WASTE WATER TERRACE
CFS ALERT
NUNAVUT

DATE
2017/07/10

DESIGNED BY / CONCEVU PAR
MR. G. MCNAY

CHECKED BY / VÉRIFIÉ PAR
J.J.L.

DATE / DATE
2017/07/10

DESIGNED BY / CONCEVU PAR
MR. G. MCNAY

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J.J.L.

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MR. G. MCNAY

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MR. G. MCNAY

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