

Environmental Protection Operations Directorate
Prairie & Northern Region
5019 52nd Street, 4th Floor
P.O. Box 2310
Yellowknife, NT X1A 2P7

ECCC File: 6500 000 004/005
NWB File: 8AC-ALT1929



September 22, 2020

via email at: licensing@nwb-oen.ca

Stephanie Autut
Executive Director
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0

Dear Stephanie Autut:

RE: Licence #8AC-ALT1929 – Department of National Defense (DND) – Alert – Annual Report Reviewed

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above-mentioned Annual Report.

ECCC's specialist advice is based on our mandate pursuant to the *Canadian Environmental Protection Act* and the pollution prevention provisions of the *Fisheries Act*.

The following comments are provided for Alert:

1. Topic: Results for ALT-2

Reference(s)

- Appendix B – Monitoring Program Stations No ALT-2 and ALT-3

Comment

Appendix B provides the results for sampling at ALT-3 during the July and August sampling periods, including a summary table and the laboratory reports. The Appendix identifies Station ALT-2 as the Sewage Terrace Outfall Point, but the Annual Report provides no results for this station. As per Section I-5 of the License, this station should be monitored biweekly during periods of flow for both quality and volume.

ECCC Recommendation(s)

ECCC recommends the Proponent clarify whether station ALT-2 was sampled in 2019 and provide monitoring results for sampling events, or a rationale for why results are not available.



2. Topic: Exceedances of License Criteria

Reference(s)

- Appendix B – Monitoring Program Stations No ALT-2 and ALT-3

Comment

At sampling station ALT-3, TSS criteria were exceeded on July 17, 2019 (110 mg/), and oil and grease criteria were exceeded on August 7 (11.5 mg/). Appendix B identifies the oil and grease exceedance but does not acknowledge the TSS exceedance. The Annual Report provides no discussion on the potential sources of the exceedances and measures to prevent future exceedances.

ECCC Recommendation(s)

ECCC recommends the Proponent clearly identify all exceedances of Effluent Quality Criteria in the Annual Report. For those parameters that do exceed criteria, provide a discussion of potential sources of exceedance and potential measures to prevent future exceedances.

3. Topic: Summary of Monitoring Results

Reference(s)

- Appendix B – Monitoring Program Stations No. ALT-2 and ALT-3
- Appendix C - Monitoring Program Stations No. ALT-4-5-6-7
- Appendix D - Monitoring Program Stations No. ALT-8-9-10-11

Comment

Appendices B through D provide summaries of when monitoring was conducted at Stations ALT-2 through ALT-11, however, only Appendix B provides a summary of the monitoring results (ALT-3). For all other monitored stations, the results are only presented in the lab data sheets. For clear interpretation of results and overall understanding of monitoring results for the site, site data should be summarized in a central table for relevant parameters of concern. Where applicable, results should be clearly compared to relevant discharge criteria.

ECCC Recommendation(s)

ECCC recommends that future annual reports provide a table summarizing data from the laboratory sheets for all monitoring stations.

4. Topic: Clarification of Sampling at ALT-10

Reference(s)

- Appendix D – Monitoring Program Stations ALT-8-9-10-11

Comment

Appendix D states that, "In June 2019, analytical results of the berm water at the Lower Airfield Tank Farm (ALT-8 -8.1), Upper Tank Farm (ALT-9), and the Day Tank (ALT-10) are compliant to the Effluent Quality Limits" and were intended for discharge upon approval by the Inspector and the NWB. The Appendix then goes on to state that the secondary containment for ALT-10 (Day Tank) was dry. Based on these conflicting statements it is unclear the status of ALT-10 during the June sampling period and what actions were taken.

ECCC Recommendation(s)

ECCC recommends that the Proponent provide clarification on sampling of ALT-10 in 2019, including whether discharge occurred.

If you need more information, please contact Orlagh O'Sullivan at (431) 276-4506 or Orlagh.OSullivan@Canada.ca.

Sincerely,

[original signed by]

Orlagh O'Sullivan
Environmental Assessment Officer

cc: Brian Asher, Acting Head, Environmental Assessment North (NT and NU)