



8 Wing Environmental Management
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3 November 2020

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

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

Dear Licensing Department,

The Department of National Defence (DND) - 8 Wing Trenton Environmental Management Office is providing this response letter to the ECCC Technical Review Comments for 2019 Annual report, 8AC-ALT1929, Canadian Forces Station Alert Project dated September 22, 2020.

DND - 8 Wing Trenton Environmental Management Office appreciates the dedicated efforts of the NWB and the constructive recommendations by ECCC to collaborate and review the annual report for CFS Alert.

DND - 8 Wing Trenton Environmental Management Office's responses to the ECCC Comments:

1) Topic 1. Results for ALT-2

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.

DND Response: DND would like to remind ECCC that during the 2019 sampling events Licence number 8AC-ALT1929 was in negotiations and was not finalized until November 2019, several months after sampling events took place. Bi-weekly sampling was not a condition of the previous Licence (3BC-ALT1015 (8AC-ALT----)) and we had no knowledge during the time of summer sampling that it would be, therefore the recommendation is unreasonable. This past summer a collective effort was put forth to collect more samples as indicated in the current Licence 8AC-ALT1929.

Note: Although collective effort was given to collect bi-weekly sampling of the sewage terrace this summer there was some challenges presented,

specifically wildlife and environmental dangers causing workplace safety hazards. For several weeks in late July and early August an aggressive wolf was in the vicinity of the collection locations. Mid-August through September Polar Bears then arrived. These interactions limited sampling due to life threatening conditions. These details will be documented in the 2020 Annual report.

- 2) **Topic 2: Exceedances of License Criteria:** 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.

DND Response: DND is supportive in ECCC request. It should be noted that discussions have been made and documented in previous years Annual reports to the fact that DND/ NWB are aware that TSS and Oil and Grease commonly exceed the stipulated criteria. As a result of these exceedances, and included in the new Licence, we are in the planning stages of constructing a new Waste Water Treatment Plant as identified in Part E of the Licence to rectify these exceedances.

- 3) **Topic 3: Summary of Monitoring Results:**
ECCC recommends that future annual reports provide a table summarizing data from the laboratory sheets for all monitoring stations.

DND Response: DND understands ECCC request. It is DND's perception that the current lab provided results adequately addresses the water quality parameters identified in the old Licence schedule and subsequently the new Licence Schedule I, Table 1. Producing a new table could potentially lead to confusion and is unwarranted redundancy.


- 4) **Topic: Clarification of Sampling at ALT-10:**
ECCC recommends that the Proponent provide clarification on sampling of ALT-10 in 2019, including whether discharge occurred.

DND Response: As noted in Appendix D of the Water Licence in the email (8AC-ALT---- - DND CFS Alert - Secondary Containment Waters Discharge Notice & Request) addressed to the CIRNAC Inspectors contained in Appendix D, ALT-10, ALT-11 and ALT-12 were dry at the time of sampling / inspection. This dry condition happens frequently on site due to the actual polar desert conditions and lack of precipitation, favour for evaporation, on station by the time the environmental sampling team arrived to collect samples.

DND - 8 Wing Trenton Environmental Management Office is committed to work with the NWB and ECCC; we are supportive of any teleconferences and technical meetings to collaboratively help provide and establish a comprehensive report in order to satisfy the Annual report.

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

Yours truly,



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