



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

28 November 2022

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

**Re: DND RESPONSE TO THE NUNAVUT WATER BOARD LETTER:
LICENCE NO: 8AC-ALT1929, TYPE "A"; DEPARTMENT OF NATIONAL
DEFENCE; 2021 ANNUAL REVIEW**

Dear Licensing Department,

The Department of National Defence (DND) - 8 Wing Trenton Environmental Management Office is providing this response letter to the NWB Annual Report Review Comments for 2021 Annual report, 8AC-ALT1929, Canadian Forces Station Alert Project dated October 25, 2022.

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

DND - 8 Wing Trenton Environmental Management Office's responses to the respective departments Recommendations (R):

For response 1, DND has included all requests and responses given during that time. CIRNA questions are indicated in **red** and DND response indicated in **green**.

- 1) Regarding R 1: CIRNA recommends that DND address the concerns raised by the CIRNA Resource Management Officer in the summer of 2021 and notify the CIRNA Resource Management Officer of any changes that have been made.

CIRNA recommends that DND clarify the number of sampling events for each monitoring station, and provide monitoring results for all sampling events, or a rationale for why these results are not available.

This was completed and will continue to be included in the annual reporting.

Regarding R 2: CIRNA recommends that DND provide volumetric flow monitoring results for the remaining active monitoring stations, or a rationale for why these results are not available, in future Annual Reports written under the Type “A” Licence No. 8AC-ALT1929.

DND would like to remind CIRNA 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. This was not a condition of the previous Licence. Going forward, DND will provide a rough order magnitude estimate of volumetric flow based off an annual water balance. As there is no way to quantify the exact amount of volume going through the individual site/s except for ALT-1. CFS Alert is a polar desert with limited water flow that makes it difficult to measure with devices, most flowing water is absorbed by the tundra and evaporated simultaneously.

Regarding R 3: Licence No. 3BC-ALT1015 requires the licensee to report updates to management plans, including the Spill Contingency Plan. The Annual report states that no updates were made to the Spill Contingency Plan, yet the most recent Spill Contingency Plan is dated “November 2010; revised December 2019.” Plans that have been updated should be reported as so in Annual Reports.

DND made corrections to the annual report March 2021.

- 2) Regarding R 5: NWB recommends that as part of Licence Part J, Item 6, requires the submission of a reclamations options analysis for historical waste deposit sites no longer in use within twelve (12) months of the Minister’s approval of the Licence. The Board has no record of receiving the document. Please submit the analysis.

A consultant was retained by DND to complete this work in 2020. Unfortunately, due to COVID-19 related constraints and the sensitive health and safety environment of the workers on Station, only mission critical operations were being allowed to be performed work at CFS Alert. These measures continue today as Departmental requirements. Once these restrictions are lifted, external personnel will be allowed to resume visits the Station. DND is committed to completing this options analysis as directed.

- 3) Regarding R 8: The Report states: “[t]he ALT 12 landfarm was taken temporarily out of commission in 2018 due to a punctured liner during the

material transfer. All material was removed. Planed [sic] repairs to the liner are to take place during the summer of 2022.” The Board requests a clarification on where the material was removed.

During the planned removal/ transferring of the soil to the Lower Landfarm (ALT-11) the liner was damaged in the upper Landfarm (ALT-12). All material from ALT-12 was transferred to ALT-11 for treatment when damages to the liner were noticed. All material currently is contained and resides in ALT-11 until such time it is remediated. Repairs to the ALT-12 liner were completed in the summer of 2022 as per the original engineered drawings.

- 4) Regarding R 9: The Report notes that several waste disposal facilities (Millionaire's Dump, Battery Dump, and Dump #3) do not accept any more waste. The Board requests the Licensee provide more information on further plans for these facilities.

Please see bullet item 2 above. Currently, the Station is sending hazardous waste, industrial/construction waste and bulky waste (originally designated for Millionaire's Dump, Battery Dump, and Dump #3) south for proper disposal except that which can be incinerated. Until such time we can get our retained consultant on site to perform the options analysis of the noted waste disposal facilities, which will include recommendations for further/future plans of the facilities. In the meantime, those noted waste disposal facilities are inactive and are not being used. DND will continue to monitor through the annual surveillance network program and annual reporting.

As indicated in NWB letter, all other recommendation/concern deadlines will be captured in the annual Alert reporting submission.

DND - 8 Wing Trenton Environmental Management Office is committed to work with the NWB, CIRNA 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.

Respectfully,

Nathan Koutroulides B.Sc., CD, PMP
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