

File No: **8AC-ALT1929** 

July 29, 2024

Nathan Koutroulides 8 Wing Environment Management 74 Polaris Avenue, Room 305 P0 Box 1000, Stn Forces Astra, ON KOK 3W0 Andrew Tam 8 Wing Environment Management 74 Polaris Avenue, Room 305 P0 Box 1000, Stn Forces Astra, ON KOK 3W0

Email: <u>Nathan.Koutroulides@forces.gc.ca</u> Email: <u>Andrew.Tam@forces.gc.ca</u>

RE: NWB Technical Review of 2023 Annual Report; Water Licence No: 8AC-ALT1929

Dear Nathan Koutroulides and Andrew Tam:

The Nunavut Water Board (NWB or Board) has completed the technical review of the 2023 Annual Report for the type A Water Licence No: 8AC-ALT1929 (Licence) issued to the Department of National Defence (DND or Licensee).

On March 27, 2024, the NWB acknowledged receipt of the 2023 Annual Report and made it available for public review with the deadline of May 27, 2024. Comments were received from Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) and Environment and Climate Change Canada (ECCC) on May 16, 2024, and May 27, 2024 respectively.

The submissions from Interveners are attached for DND's consideration.<sup>1</sup> The NWB strongly recommends that the Licensee consult these submissions for the issues identified.

The table below provides a brief summary of issues found outstanding during the review of the Annual Report. The table also provides deadlines for the Licensee to respond to identified recommendations and concerns. For more detailed discussion on each item, please refer to the respective Intervener's comments submission referenced above.

<sup>&</sup>lt;sup>1</sup> Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC), May 16, 2024; and Environment and Climate Change Canada (ECCC), May 27, 2024

No.	Interveners Recommendations	Deadline to Respond by and Provide Outstanding Information	
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)			
1	(R-1) Provide an actionable plan for addressing the exceedances to reduce the number of overall exceedances and mitigate the issues by removing the source of these exceedances.	October 31, 2024	
2	(R-2) Provide the monthly and annual quantities of discharges to the wastewater treatment facility as per Schedule B Item b of the Licence.	March 31, 2025 (2024 Annual Report)	
3	(R-3) Provide the missing quality data from station ALT-12 (required as per Schedule B, Item c of the Licence), or provide a rational for the information not being included in the 2023 Annual Report.	October 31, 2024	
4	(R-4) Provide the monthly and annual quantities of sludge removed from the wastewater treatment facilities and the solid waste disposed at the disposal facilities required as per Schedule B Item d and Item e of the Licence.	March 31, 2025 (2024 Annual Report)	
5	(R-5) Provide a potential action plan to repair defects in the Sewage Terrace and Outfall System. The plan that addresses these issues should be submitted to the Board and CIRNAC Inspectors for approval. The plan should be submitted within 60 days so that actions can be taken this season to prevent possible contamination entering water bodies.	September 30, 2024	
6	(R-6) Provide action plans to clean up or contain the spill as well as an action plan that would mitigate any future glycol spills.	October 31, 2024	
7	(R-7) Provide an action plan to correct the deficiencies in the identified infrastructure [main station landfill, battery dump, millionaire's dump and dump 3].	October 31, 2024	
8	(R-8) Within 90 days, the Licensee to provide the required updated Water Management Plan [Part D Item 10 and Item 11] in order to maintain compliance with the issued water licence.	October 31, 2024	
9	(R-9) Provide an update to the issues noted within the	March 31, 2025 (2024 Annual	
	2019 Inspection Report.	Report)	
Environment and Climate Change Canada (ECCC)			
10	(3) Revise the Spill Contingency Plan to include quantity, storage information (i.e., containment measures), and spill response measures for glycol and any other hazardous substances that could spill or leak into the environment.	October 31, 2024	

Nunavut Water Board (NWB)			
11	The Board echoes the requirement form CIRNAC	October 31, 2024	
	about the updated Water Management Plan in		
	accordance with Part D, Item 11 of the Licence. The		
	Board also acknowledges the Licensee's commitment		
	to provide the required Plan in 2024 as noted in their		
	response letter (dated October 18, 2023) to the 2022		
	Annual Report Review.		

Copies of all documents received during Annual Report review can be accessed through the NWB's Public Registry and FTP site using the following link:

ftp://ftp.nwb-oen.ca/registry/8%20MISCELLANEOUS/8A/8AC%20-%20Camp/8AC-ALT1929%20New%20DND/3%20TECH/B%20GENERAL/2%20ANNUAL%20RPT/2023

Should you have any questions, please feel free to contact the undersigned at (867) 360-6338 (extension 29) or abid.jan@nwb-oen.ca.

Sincerely,

Abid Jan

Technical Advisor Nunavut Water Board

Enclosure: Comments – CIRNAC, ECCC

Cc: Distribution List – Alert