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3BC-EUR1116, Questions for the Amendment Application

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Tue, Mar 15, 2016 at 9:57 AM

To: "Ste-Marie, Marc (EC/EC)" <marc.ste-marie@canada.ca>

Cc: "Cloutier-Dussault, Jean-Philippe (EC/EC)" < jean-philippe.cloutier-dussault@canada.ca>, Ida Porter < ida.porter@nwb-oen.ca>, Robin Ikkutisluk < robin.ikkutisluk@nwb-oen.ca>

Good Afternoon,

On January 20, 2016, the NWB solicited comments for the amendment application for water licence 3BC-EUR1116 (High Arctic Weather Station, Eureka) submitted by Environment and Climate Change Canada. Comments were received from Fisheries and Oceans Canada (DFO) and from Indigenous and Northern Affairs Canada (INAC). I have attached to this email the comments from INAC, dated Feb 22, 2016, I will be making reference to it below in this email. Please note that all the received comments are on the NWB ftp site: ftp://ftp.nwb-oen.ca/

A response to the following questions and recommendations is required in order to proceed with your amendment application.

- 1) Have you recently submitted a project proposal application to NPC including a renewal water license application for 3BC-1116?
- 2) In 2011, the NWB approved the "Interim Abandonment and Restoration Plan Eureka High Arctic Weather Station" Plan; However, in 2011 the NWB stated in the issued water licence that "INAC identified that there is infrastructure and waste material on site associated with the DND. The Licensee should communicate to the NWB and INAC any agreements in place with the DND or other parties, for reclamation initiatives along with their respective implementation schedules". On Feb 19, 2016 you sent an email to the NWB on this subject matter (this email has been placed on our ftp site). It is unclear from the email received if you are confirming that there is no DND infrastructure and waste material on the site/within the scope of your licence 3BC-EUR1116. Has all DND infrastructure and waste material been clearly identified by DND and is it being handled by their A&R plan for 8BC-ERK1015? Can you confirm that there is no longer any DND infrastructure and waste material being handled under the scope of your undertaking?
- 3) The current sewage lagoon has a capacity for wastes from 21 people however the current proposal for quarrying and construction activities will include a modular camp to house up to 50 workers. Where will the hauled gray water and sewage from the activities be disposed of? The application simply states that the waste will be taken to 'an approved sewage disposal site' it is unclear what site this is referencing. If the existing sewage lagoon is to be the disposal site for the modular camp material, please provide an updated plan as to how sewage from the modular camp will be accommodated under the existing capacity of the sewage lagoon, or specify what alternative arrangements will be made to ensure proper treatment and disposal of sewage from the modular camp.
- 4) The 2014 Annual Report states that the design of a new sewage treatment plant and lagoon was to be awarded to a consultant and plans made for proceeding with an RFP for tender. Can you confirm what the various design options for the new lagoon are, the proposed solutions for resolving the exceedances on the lagoon discharge, and the timeline for implementation.

For additional information pertaining to the following INAC recommendations and questions, please refer to the attached comments received from INAC, dated February 22, 2016:

5) INAC recommends that the applicant be required to note in the project summary that

wastewater from the Blacktop Creek washcar is also being deposited into the current lagoon, in addition to sewage from the modular construction camp. Clarification is sought as to whether the current lagoon has the capacity to receive wastewater from the Blacktop Creek washcar. INAC also recommends that the applicant be requested to clarify whether there are likely to be hydrocarbon contaminants from the washcar entering the sewage lagoon.

- 6) INAC has identified the following inconsistency in the Quarry Operation Plan and is requesting that the plan be modified prior to the issuance of the amendment water licence:
- The Quarry Operation Plan (prepared by Nuna East Ltd.) states that "Given the natural ground of the quarry footprint, neither the permafrost layer nor vegetation are relevant factors in this case", however, the plan also notes that "The pit floor will also have a positive grade applied for drainage to flow and will not create a ponding effect". INAC recommends that the applicant modify the Quarry Operation Plan so that it clearly recognizes measures in place to prevent ponding, ensure proper drainage from the quarry pit, and mitigate permafrost melt.
- 7) INAC recommends that the applicant be requested to include in their Quarry Operation Plan how runoff collected in the collector ditches and basin will be assessed to ensure that this runoff meets the criteria for 'clean water', (e.g. meet criteria for Canadian Environmental Water Quality Guidelines for Protection of Aquatic Life and that the amended licence include a total suspended sediment (TSS) criterion for runoff water) and is not considered a 'waste' under Nunavut Waters Regulations.
- 8) INAC recommends that the applicant be requested to confirm that no water will be required for dust suppression in relation to quarrying, crushing and sorting of aggregate, or the runway refinishing.
- 9) INAC recommends that the applicant be requested to explain the measures that will be taken to prevent dust from quarrying operations from entering nearby streams and water bodies.
- 10) INAC recommends that the applicant be requested to clarify whether ash from the temporary camp incinerator will be dealt with in the same manner as described in the Operations and Maintenance Procedures for the permanent incinerator.

As you prepare your written response to the above questions and recommendations, please do not hesitate to contact me if you need further clarification.

Sincerely,



Technical Advisor- Conseillère Technique

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