



Renewal and Amendment of water licence 3BC-BAF0919

Wyman, William <william.wyman@raytheon.com>

Mon, Feb 4, 2019 at 7:31 AM

To: Derek Donald <derek.donald@nwb-oen.ca>

Cc: Licensing Department <licensing@nwb-oen.ca>, "JEREMY.LAFLAMME@forces.gc.ca"

<JEREMY.LAFLAMME@forces.gc.ca>, "dave.baines@nwb-oen.ca" <dave.baines@nwb-oen.ca>

Hello Mr. Donald,

My response to your questions follow:

1. **Sewage Disposal**: Sewage will be disposed of by discharge to a sump. There is an incinerating toilet on-site, but its cycle time means that it is not practical for anything but a small crew. Its primary purpose is for if the site is without power in the winter. A small crew would be dispatched to the site. The crew would first restore power to the site, but it would take some time for the sewage system to thaw. In that time the crew would use the incinerating toilet.;
2. **Fuel Containment**: The vertical tanks in berms that were in place when this licence was last issued in 2009 have been replaced with horizontal double walled tanks. The design of these horizontal tanks prevents water from entering the secondary containment.
3. **Spill Plan**: I will update INAC to CIRNAC in future updates of the NWS Spill Contingency Plan
4. **Landfarm**: There are documents in the NWB Registry that show that the stamped drawings were submitted to the NWB:

- On 14-Oct-2008, the plan for the Landfarm Treatment Facilities ([ftp://ftp.nwb-oen.ca/registry/3%20MUNICIPAL/3B/3BC%20-%20Camp/3BC-BAF0919%20\(BAF-3\)/1%20APPLICATION/2009%20Renewal/081003%203BC-BAF0409%20Supp%20Info%20for%20Hydrocarbon-Impacted%20Soil%20Storage%20Landfarm%20Treatment%20Facilities-IACE.pdf](ftp://ftp.nwb-oen.ca/registry/3%20MUNICIPAL/3B/3BC%20-%20Camp/3BC-BAF0919%20(BAF-3)/1%20APPLICATION/2009%20Renewal/081003%203BC-BAF0409%20Supp%20Info%20for%20Hydrocarbon-Impacted%20Soil%20Storage%20Landfarm%20Treatment%20Facilities-IACE.pdf)) that address location on-site, design considerations, and operations and maintenance considerations is stamped on page 10. Copies of the drawings (not stamped) referenced in this document are in the registry file.
- On 14-Oct-2008, A letter from Louise Chawner (Nasittuq) was submitted to the NWB referencing the stamped drawings: [ftp://ftp.nwb-oen.ca/registry/3%20MUNICIPAL/3B/3BC%20-%20Camp/3BC-BAF0919%20\(BAF-3\)/1%20APPLICATION/2009%20Renewal/081014%203BC-BAF0409%20Stamped%20Drawings%20Cover%20Letter-IACE.pdf](ftp://ftp.nwb-oen.ca/registry/3%20MUNICIPAL/3B/3BC%20-%20Camp/3BC-BAF0919%20(BAF-3)/1%20APPLICATION/2009%20Renewal/081014%203BC-BAF0409%20Stamped%20Drawings%20Cover%20Letter-IACE.pdf). Is it possible that the NWB has treated these stamped drawings as confidential? On 28-Jan-2009, Ms. Beaulieu acknowledged that Nasittuq Corp. requested that stamped as-built drawings of tank farms be treated as confidential in this letter ([ftp://ftp.nwb-oen.ca/registry/3%20MUNICIPAL/3B/3BC%20-%20Camp/3BC-BAF0919%20\(BAF-3\)/1%20APPLICATION/2009%20Renewal/081014%203BC-BAF0409%20Stamped%20Drawings%20Cover%20Letter-IACE.pdf](ftp://ftp.nwb-oen.ca/registry/3%20MUNICIPAL/3B/3BC%20-%20Camp/3BC-BAF0919%20(BAF-3)/1%20APPLICATION/2009%20Renewal/081014%203BC-BAF0409%20Stamped%20Drawings%20Cover%20Letter-IACE.pdf)).

[3\)/2%20ADMIN/0%20GENERAL/2009%20New%20Application/090128%203BC-BAF----%20notice%20of%20application%20and%20request%20for%20comment-OMLE.pdf](#)), but I don't know if this extended to other stamped drawings.

Regards,

Will



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From: Derek Donald [mailto:derek.donald@nwb-oen.ca]
Sent: Friday, February 01, 2019 4:25 PM
To: Wyman,William <william.wyman@raytheon.com>
Cc: Licensing Department <licensing@nwb-oen.ca>
Subject: [External] Renewal and Amendment of water licence 3BC-BAF0919

Hello William

I have received and reviewed the Application package mentioned below and have a few questions that would help prior to sending it out for external comments.

- 1) Sewage Disposal. There is some contradicting information in the Application package. Can you confirm the sewage disposal system, i.e. if and when incineration will be used versus disposal to the sump.
- 2) Fuel containment. A QAQC plan was submitted that indicates fuel at BAF-3 is not stored in berms and therefore no water sampling will occur. Can you provide a description of how fuel is stored on site and how water that accumulates in those areas is collected, tested, and discharged.
- 3) Spill Plan. The next update to the spill plan will require the name change from INAC to CIRNAC.
- 4) Landfarm. In accordance with the current Licence, the NWB requires pursuant to Part G, item 4 that the Licensee submit stamped as-built drawings of the landfarm and provide an Operation and Maintenance (O&M) Plan pursuant to Part E, item 2 for review and approval. As of yet, the NWB has not received these documents. Could you provide them.

Regards,

Derek

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