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Our file: 4517 000 001  
NWB file: 3BC-BAF0919

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*Via email at:* [licensing@nunavutwaterboard.org](mailto:licensing@nunavutwaterboard.org)

**RE: 3BC-BAF0919 – Operation and Maintenance Plan for the Landfill and Handling of Solid Wastes at BAF-3**

On behalf of Environment Canada (EC), I have reviewed the information submitted with the above-mentioned application. The following specialist advice has been provided pursuant to the *Canadian Environmental Protection Act*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

On behalf of the Department of National Defence, Nasittuq Corporation has submitted an Operations and Maintenance (O&M) plan for the Landfill and Handling of Solid Wastes at North Warning System Site BAF-3, Brevoort Island. The site is located on Brevoort Island, off the east cost of Baffin Island, at 63°20'24"N 64°08'40"W. BAF-3 is an unmanned site, except for quarterly scheduled maintenance trips and between May and September, there may be an average of 14 to 30 personnel on-site for the clean up and remediation of a fuel spill which occurred in 2007, as well as occasional third party visitors. Although an existing landfill is present at the site; all waste is incinerated and the ash, hazardous, and other non-incinerable materials will be flown to Iqaluit for disposal at the city's landfill. This plan is a requirement of the revised Water License 3BC-FOD0919.

Upon review of the Plan, EC provides the following comments and recommendations for the Nunavut Water Board's consideration:

- Environment Canada recommends that all potential products that are attractants to wildlife be made inaccessible to wildlife at all times. Camp waste can attract predators of migratory birds (e.g., foxes and ravens) to an area if not disposed of or stored properly.
- The Plan states that garbage will be incinerated. Please note that EC has developed a Technical Document for Batch Waste Incineration, and is available at the following web link:

<http://www.ec.gc.ca/drgd-wrmd/default.asp?lang=En&n=82401EC7-1>

The technical document provides information on appropriate incineration technologies, best management and operational practices, monitoring and reporting.

- It is stated that there are no records of the solid waste deposited in the past in the landfill. As such, Environment Canada recommends that there be sampling of surface water (ponded water, standing water in proximity to landfills) and seepage areas to assess the landfill's performance the potential for environmental risk.

If there are any changes to the proposed plan, EC should be notified, as further review may be necessary. Please do not hesitate to contact me with any questions or comments with regards to the foregoing at (867) 975-4631 or by email at paula.c.smith@ec.gc.ca

Yours truly,

***Original signed by***

Paula C. Smith  
Environmental Assessment Coordinator  
Environmental Assessment – North  
Environmental Protection Operations

cc:      Carey Ogilvie (Head, EA-North, EPO, Yellowknife, NT)  
          Carrie Spavor, (Environmental Assessment Coordinator, Iqaluit, NU)  
          Ron Bujold (Environmental Assessment Technician, EPO, Yellowknife, NT)