



National Defence

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Quartier général de la Défense nationale
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3586-11-5 DAEPM (R&CS 3-4-5)
RDIMS No. 753925

22 September 2008

Mr. Andrew Keim
Enforcement Officer
Nunavut District Office
Indian and Northern Affairs Canada
P.O. Box 100
Iqaluit, Nunavut
X0A 0H0

Mr Keim:

RESPONSE TO INSPECTOR'S DIRECTION, INAC

Ref: Inspector's Direction - Nunavut Waters and Nunavut Surface Rights Tribunal Act, CIDM #244782, dated 15 August 2008

Representing the Department of National Defence (DND), the North Warning System (NWS) Office received your Inspector's Direction, via registered mail, on 22 August 2008. Although the NWS is operated and maintained under contract by Nasittuq Corporation on our behalf, it does fall to the Department to address the concerns raised in the direction. Accordingly, the following measures have taken place or will take place to comply with the direction and to reduce the probability of similar incidents in the future:

1. **To immediately cease the activity of open burning at all sites:** Where no approved Government of Nunavut incinerator exists, all open burning at NWS sites governed by a water licence, particularly Cambridge Bay (CAM-M), Shepherd Bay (CAM-3), Hall Beach (FOX-M), Dewar Lakes (FOX-3) and Cape Dyer (DYE-M), ceased as of 21 August 2008.
2. **Within 30 days following receipt of this Direction to provide to the Nunavut Water Board and the Inspector a plan to address this issue:** The North Warning System Office will fund a project to purchase and install INAC and Environment Canada approved incinerators at our Long Range Radar Sites. This program will not be completed before the summer of 2009, given procurement and limiting logistical factors. In the meantime, for both Cambridge Bay (CAM-M) and Hall Beach (FOX-M), Nasittuq has issued direction to all site managers to dispose of domestic waste using the community services of the municipalities of Cambridge Bay and Hall Beach respectively. For the unattended sites at Shepherd Bay (CAM-3), Dewar Lakes (FOX-3) and Cape Dyer (DYE-M), Nasittuq has ceased all open burning and all waste generated at these sites will be removed for disposal at respective Logistic Support Sites located in Cambridge Bay and Hall Beach. Additionally, Nasittuq will brief all their site managers

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at the Fall Logistics Support Site Managers' Conference on the established procedures for the proper disposal of HAZMAT, as detailed in the Nasittuq Environmental Protection Plan (EPP).

3. **Within 30 days following receipt of this Direction apply to the Nunavut Water Board for an amendment to the current licences changing the name and the party responsible for the activities on site to Nasittuq Corporation:** Nasittuq Corporation has total Care, Custody and Control of the NWS sites and operates and maintains them on behalf of the DND. Originally, Nasittuq Corporation had, in error, taken out the Water Licences in the name of the Department. There has been a considerable amount of correspondence, over the past year, on this matter and the issue appears to be resolved through the clarification issued by the Nunavut Water Board (NWB), 26 August 2008. Nasittuq will submit the new applications to the NWB. Until this matter is resolved, PWGSC is withholding \$700,000.00 of Nasittuq's monthly payment.
4. **Within 30 days following receipt of this Direction provide to the Inspector and the Nunavut Water Board proof of compliance with the items outlined in the 2007 Inspection Report:** Five items were identified in the 16 July 2007, they were:
 - a. Open burning of hazardous waste: as described herein, open burning has ceased;
 - b. Location of hazardous waste treatment facility: the name and location of the hazardous waste treatment facility is Recyclex, 8381, Place Marien, Montreal-EST, Quebec. H1B 5W6;
 - c. Submission of Emergency Response Plan: the Emergency Response Plan, (Spill Contingency Plan) was submitted at the time of the application. Licence NWB6FOH0409 acknowledges receipt and approval of the plan;
 - d. Installation of metering system to accurately record water use: meters have been installed on the raw water intake line and the treated sewage line; and
 - e. Submission of sampling results from Monitoring Program: a sewage sample was submitted with the Annual Report.

The Department of National Defence takes this matter very seriously and is working diligently with the NWS Operations & Maintenance Contractor to reduce the likelihood of similar incidents in future.

Please direct comments or questions, with respect to this matter, to Major A. D. Cameron, R&CS 3-4 at (613) 998-8602.

Respectfully,



Dan Ross