



## Avatiligiyyiit

## Department of Environment

## Ministère de l'Environnement

**February 5, 2010**

**Phyllis Beaulieu  
Manager of Licensing  
Nunavut Water Board**

**via Email to:** licensing@nunavutwaterboard.org

**RE: NWB FILE # 3BC-ERK - New Application - Dept. of National Defence - Eureka Project**

Dear Ms. Beaulieu:

The Government of Nunavut, Department of Environment (DOE) has reviewed the new water license application from the Department of National Defence. The DOE has the following comments and recommendations based on the *Environmental Protection Act*.

## GENERAL

The GN-DOE contact number listed on page 13 should be updated. In the event of a spill, the DOE contact is Ian Rumbolt, Manager of Pollution Control, who can be reached at (867) 975-7748 or [irumbolt@gov.nu.ca](mailto:irumbolt@gov.nu.ca).

The spill plan should include the contact number for the NWT-NU 24-hour Spill Line as well as a copy of the spill report form, which can be obtained from the DOE website (<http://www.gov.nu.ca/env/applications.shtml>). The proponent is required to use this form for reporting to the Spill Line in the case of spills. Additionally, the proponent is advised to enter spill information electronically in the form so the information is legible to regulators inspecting the spill.

An Operations & Maintenance Manual should be provided for the sewage lagoon. This manual should include further information on the digester to be used as well as a sewage sludge management plan that outlines the chemical composition of the sludge as well as when, where, and how the sludge will be stored, treated, and eventually disposed of.

An Operations & Maintenance manual should be provided for the Solid Waste Facility. This manual should include, but is not limited to, the following:

- Hazardous Waste Management Plan (This plan should outline proper handling and storage techniques, as well as proper disposal methods, including a waste manifest)
- Bulky Waste Management Plan

## **WASTE DISPOSAL**

For large camps (over 50 people or greater than 4410 person days/yr), the proponent shall apply appropriate technologies to ensure complete combustion of wastes, and the use of a dual chamber, controlled-air flow incinerator is recommended. Both the Government of Canada and the Government of the Nunavut are signatories to the *Canada-Wide Standards for Dioxins and Furans* and the *Canada-Wide Standard for Mercury Emissions*, and are required to implement them according to their respective jurisdictional responsibility. Installation of an incineration device capable of meeting the emission limits established under these standards is required. Compliance with the Standards shall be demonstrated with an initial stack test upon commission of the incinerator at site, the results of which shall be submitted to the Nunavut Impact Review Board, Environment Canada, and Government of Nunavut-Department of Environment. During the course of operations, the proponent shall make determined efforts to achieve compliance with the Canada-wide Standards for dioxins and furans and the Canada-wide Standard for mercury. Determined efforts shall include but not be limited to appropriate record management, including maintenance reports, operator training logs, and the submission of an annual report that outlines the efforts made to achieve compliance with the Standards.

Hazardous materials stored on-site should be marked so they will be visible under all conditions, in all seasons. This recommendation is intended to help prevent possible injuries to camp personnel and/or damage to the containers. Unless otherwise specified by the land use inspector or license -issuing agency, all hazardous materials should be removed from the site upon completion of the activity. All hazardous waste should be accompanied by hazardous waste manifests with the appropriate information (Generator number, carrier number, and receiver number).

DOE monitors the movement of hazardous wastes, from generators, carriers to receivers of the wastes, through the use of a tracking document known as a Waste Manifest. A Waste Manifest must accompany all movements, and all parties must register with DOE by contacting Ian Rumbolt at (867)975-7748 ([irumbolt@gov.nu.ca](mailto:irumbolt@gov.nu.ca)) or Robert Eno at (867)975-7729 ([reno@gov.nu.ca](mailto:reno@gov.nu.ca)). This procedure should be stated in the spill plan.

## **LANDFARM**

DOE recommends that the Proponent provide more information on this facility including, but not limited to, the following:

- Location
- Dimensions
- Engineered Drawings
- Construction Timeline
- Operations & Maintenance Manual

The Proponent is referred to DOE's Environmental Guideline for Contaminated Site Remediation.

The DOE thanks the NWB for giving us the opportunity to review and provide comments on this submission for the Eureka Project from the Department of National Defence. Please contact me if you have any questions or comments.

Sincerely,

***Original signed by***

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