



National Defense

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1262-1 (W Env O)

12 September 2013

Ms. Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board
PO Box 119
Gjoa Haven, Nunavut X0B 1J0

Dear Ms. Beaulieu,

1. On 7 August 2013, the Department of National Defence 8 Wing Environmental Management (DND) received the Water Use Inspection Report, for Licence Number 3BC-ERK1015 (CFS Eureka), dated 11 July 2013. The following provides our response to the Aboriginal Affairs and Northern Development Canada (AANDC) Inspection.
2. Waste Disposal. As described in the Water Use Inspection Form, Mr. Keim, the AANDC Inspector, requested sampling results from the Eureka Sewage Lagoon, Surveillance Network Program (SNP) monitoring station ERK-1 (Sewage Treatment Facility). A copy of the results was e-mailed to the Inspector and Nunavut Water Board (NWB) on 19 August 2013.
3. Solid Waste. Through our arrangement with the Environment Canada Eureka Weather Station, all hazardous wastes generated at CFS Eureka are backhauled for proper disposal. The Canadian Coast Guard (CCG) completes the annual sealift to Nanisivik. Once the hazmat arrives in Nanisivik, a private contractor completes the shipment south to Quebec. In the fall of 2012, the cargo transfer was not completed due to inclement weather and sea ice conditions. As a consequence, waste was temporarily stored at the Nanisivik Deep Water Port. We are pleased to inform the NWB that on 25 August 2013, the ship M/V Umiavut from NEAS picked up all the 2012 waste stored at Nanisivik and will bring it to Clean Harbours Inc., in Brossard, Québec. A summary of this effort will be provided as an addendum to the Annual Report to the NWB.
4. Fuel Storage. The Inspection Form states: "The contaminated site (Hydrocarbon spill) behind the large stationary tanks remains after four years and three inspections of the site. When questioned regarding why this was, the Inspector was told that the site was still being assessed and that the Environmental unit was following steps outlined in the Federal Contaminated sites guidelines. It was stated that they are currently on step four of the process."
5. This Federal Contaminated Site is being assessed by the National Research Council; this planned activity is funded by the Federal Contaminated Sites Action Plan (FCSAP), a multi-stakeholder management program governed by the Treasury Board. Contaminated sites experts from stakeholder departments, including Environment Canada, the Department of Fisheries and Oceans and AANDC regularly contribute



advice to Departments managing FCSAP funded sites. At this site, there is clearly no risk of off-site migration into water bodies; therefore, it seems unreasonable to expedite any remediation effort without a full understanding of the extent of contamination. If DND were to skip steps of the federally mandated 10-step process, the Treasury Board will withdraw funding.

6. From a technical/scientific point of view, contamination present in the polar arctic geography of this site presents a low risk to the surrounding environment and people. This site is well away from the ordinary high water mark or any sources of water, and water bodies, which reduces any soil migration risks.

7. Finally, as described in the Water Use Inspection Form the short 6-8 week summer operating period presents numerous challenges. It is very difficult to coordinate and conduct complex technical/scientific activities, such as contaminated sites remediation during such a short timeframe.

8. The FCSAP constraints and technical/scientific conditions of the site were explained during the site inspection, but as stated in the Inspection Form, these explanations were not accepted. As a federal Department, DND must follow the federally mandated 10-Steps FCSAP process. It is widely understood that the timeframe for contaminated site remediation can vary and that there is no one uniform solution for all sites. However let me reassure the NWB that as we progress in accordance with the FCSAP process, proper management options will be considered and selected for this site and implemented.

9. We kindly ask that the NWB review the recommendations/direction provided and described in the Water Use Inspection Form in context with DND's response. Should you have any further questions or comments, please contact Mr. Andrew Tam, Assistant Wing Environmental Officer, at (613) 392-2811 extension 4821.

Yours truly,



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