



Field Operations Unit
Aboriginal Affairs and Northern Development Canada
Nunavut Regional Office
P.O. Box 100
Iqaluit, Nunavut X0A 0H0

October 29, 2013

Dany P. Breton
Lieutenant-Colonel
Wing Logistics and Engineering Officer
8 Wing / CFB Trenton
P.O. Box 1000 Station Forces
Astra, Ontario K0K 3W0

RE: DND Response to Water Use Inspection conducted at Eureka July 10, 2013.

Dear Mr. Breton,

Thank you for taking the time to write the response delivered to our offices and that of the Nunavut Water Board on September 12, 2013. The role of Aboriginal Affairs and Northern Development Canada (AANDC) in issues related to the use of water or deposit of waste in Nunavut is one of compliance monitoring and enforcement. Our preferred option is to work with clients by identifying instances of non-compliance, risks to the environment and/ or people, bringing them to the licensee's attention and ensuring the operator addresses these issues to achieve and maintain compliance with the License (3BC-ERK) and the *Nunavut Waters and Nunavut Surface Rights Tribunal Act*, SC 2002, c 10.

1. I will attempt to provide some surety and clarity in answer to your comments and I invite a continuing dialog between our agencies.
2. Waste Disposal: I have been forwarded the sampling results for the Eureka Sewage Lagoon, Surveillance Network Program (SNP) monitoring station ERK-1 (Sewage Treatment Facility). Thank you for your cooperation. This report will be kept on file and be an available resource to the inspector.
3. Solid Waste: I am pleased to hear that all the 2012 waste stored at Nanisivik has been picked up and shipped to an appropriate location. However, the unsecured storage of hazardous is not acceptable. Given that we are operating in the high Arctic, inclement weather conditions and sea ice conditions are expected to cause delays and should be planned for. Further to this, I was informed that the feedback received on site with respect to this issue indicated that the Canadian Coast Guard (CCG) off-loaded this material in expectation that the Department of National Defense (DND) would make arrangements for its transport to a southern port. No mention of weather delays or ice conditions was provided during the inspection and thus was not referenced in the Inspection Report. DND is ultimately responsible for these materials and should make a plan to deal with them appropriately. As requested in the Inspection Report, please submit a plan for this in an addendum to the Annual Report.



4. Fuel Storage: With respect to the contaminated site behind the large stationary tanks, which has remained after four years, it was noted that concern still remains that the spill may migrate and contaminate an area larger than initially assessed or extend under the current Bulk Fuel Storage area adjacent to the airstrip. Although you have identified that the site presents clearly 'no risk of off-site migration into water bodies' and the site presents a 'low risk to the surrounding environment and people,' I request that your office confirm these claims and provide your information from Step 3 of the Federal Contaminated Sites Action Plan. Please submit this document to me no later than November 30th, 2013. Pending my review of this document, I will recommend a suitable course of action.

In closing, after reviewing your letter and Inspectors Keim's inspection report, I have definitely noted the progress made at the site including the implementation and strict adherence to the management of the waste stream and the installation of the secondary containment at the Airstrip. Many of the requests and recommendations made in the Inspection report and further in this letter are on the obligation, under the *Act*, to respect water resources in Nunavut; ultimately, they have been made with your interests, those of Canadians and the interests of the environment at heart.

Sincerely,

Justin Hack
Water Resource Officer
Aboriginal Affairs and Northern Development
Iqaluit, NU X0A 0H0
Nunavut Regional Office
Tel: 867-975-4289
Justin.Hack@aandc.gc.ca

CC:

Erik Allain – Field Operations, AANDC
Phyllis Beaulieu – Manager Licensing, Nunavut Water Board
Andrew Tam – Assistant Wing Environmental Officer, DND
Drew Craig – Environmental Officer, DND