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14 July 2011

EC File: 4510 055 N003 002
NWB File: 3BC-ERK1015

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Manager of Licensing
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Via email: licensing@nunavutwaterboard.org

RE: Submission of Abandonment and Restoration Plan

Environment Canada (EC) has reviewed the above-mentioned Abandonment and Restoration Plan (A&R Plan) submitted to the Nunavut Water Board (NWB). 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*.

The Department of National Defense submitted an A&R Plan to the NWB as a requirement of Part I, Item 1 of water license 3BC-ERK1015 for Canadian Forces Station (CFS) Eureka. The A&R Plan is focused on two waste facilities, specifically the Barrel Dump and the Battery Dump, on-site.

Upon review of the A&R Plan, EC provides the following comments and recommendations for the NWB's consideration:

A&R Plan

- Under Section 3.1 Abandonment and Restoration Plan (Also known as Final CRP), it states that "All soils characterized as hazardous will be shipped off-site if feasible...". If off-site shipping is deemed unfeasible, then what on-site method for hazardous waste disposal will be used (i.e. landfarmed)? EC recommends that any disposal method other than what has been approved under the license issued by the NWB be reviewed.
- This A&R Plan, as a requirement of the water license, is to cover the battery dump, barrel dump, and other on-site facilities no longer in use and areas where debris has been identified as requiring restoration. As only the barrel dump and the battery dump are mentioned in the A&R Plan, if there are other facilities that are no longer used or require restoration, EC recommends the Plan be updated accordingly.

If there are any changes in the project EC should be notified as further review may be necessary. Comments previously submitted on behalf of EC regarding water license 3BC-ERK would still apply to this project. Please do not hesitate to contact the undersigned 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,



Paula C. Smith

Environmental Assessment Coordinator

cc: Carey Ogilvie (Head, Environmental Assessment-North, EPO, EC, Yellowknife, NT)
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