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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

File: DND /Nasittuq Corp. Licences
3BC-DYE0409 3BC-FOH0409
3BC-CAM0409 3BC-SHE0409
3BC-BAF0409 3BC-FOD0409

October 29, 2008

Jacques Plante, President
Nasittuq Corporation
Suite 100, 170 Laurier Avenue W.
Ottawa, Ontario
K1P 5V5

Email: jacques.plante@nasittuq.com

Subject: Department of National Defence/Nasittuq Corp.; Licence Renewal Applications; Issues and Concerns Identified during Preliminary Technical Review

Dear Mr. Plante;

The Nunavut Water Board ("NWB") acknowledges the receipt of the renewal applications from Nasittuq Corporation (Nasittuq) for Licences 3BC-DYE0409, 3BC-FOH0409, 3BC-CAM0409, 3BC-SHE0409, 3BC-BAF0409 and 3BC-FOD0409.

The NWB has completed its preliminary technical review of the files and have identified issues that require clarification from the proponent. These are as follows:

1. A description of how combustible wastes are treated at all sites. Specifically the NWB requests clarification as to the type of incineration taking place. Otherwise how is the combustible waste disposed of?
2. Which locations currently have on-site landfills that are operating, which have landfills that are closed?
3. What is the total number of person days, per year for each of the sites? This calculation should include all people on site, including DND personnel, contractors, Nasittuq Corp. staff, etc;
4. For all tank farms as-built engineered drawings, stamped and signed by a professional engineer registered in Nunavut are required. The drawings would need to show retention berms, tanks, liners, secondary containment and all other areas of interest;
5. The submitted Spill Contingency Plans are not site specific. The plans are to be specifically written for each site, identifying the fuels and chemicals on each site, their location and quantities. They should also discuss site specific equipment and infrastructure for responding to a spill and cleanup. Finally the plans should also identify the contact persons on each site and what their specific roles and duties are. Spill kit capacity should be identified, including the components of

the spill kits. Contingency plans should discuss the refueling procedures making reference to site specific conditions and limitations;

6. The current system of greywater and sewage waste disposal at several of the sites is not acceptable. Sewage and greywater at federal sites are subject to the *Guidelines for Effluent Quality and Wastewater Treatment at Federal Establishments*;
7. The current applications contain site specific 'Initial Environmental Evaluation' documents produced in 1987. In these documents there are lists of activities, including remediation activities, that are planned for the sites. The new licence applications should list all the remediation activities that have already taken place on each of the sites, all the activities planned for each of the sites in the next five years, and a timeline for implementation. If Nasittuq is not remediating the sites but another operator is, then that information should be communicated; and
8. For the landfarm at BAF-3 Brevoort Island, the remediation objective is stated to be 2500 ppm TPH. The proponent is asked to clarify this objective- why are no other remediation standards in place such as CWS-PHC fractions, BTEX, Lead and Total Heavy Metals as recommended in the *Federal Guidelines for Landfarming Petroleum Hydrocarbon Contaminated Soils*? What specifically is the end use for reclaimed soils? The application simply states that they will be used 'as backfill for the excavated areas'.

Should you have any further questions, please feel free to contact me at (867) 360-6338, at your earliest convenience.

Yours truly,

Original Signed By:

Deon Bridge
Technical Advisor

DB/dc

Copy Louise Chawner Nasittuq Corporation