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October 22, 2003

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Licencing Administrator
Nunavut Water Board
P.O. Box 119
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Your file - Votre référence
NWBSFOD
Our file - Notre référence

Via facsimile

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Re: FOX-3 Dewar Lakes Project - Application for new water licence

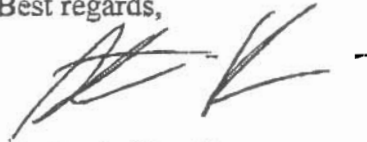
On behalf of Indian and Northern Affairs Canada (INAC), I have reviewed the August 13, 2003, application of the Nasitnuq Corporation for the licencing of the FOX-3 Northern Warning System (NWS) Long Range Radar (LRR) site. Items of concern identified in the review of the submitted documents are as follows:

1. Section 26 of the Exploration/Remote Camp Supplementary Questionnaire identified the water bodies in site map H-D67/2-8400-103 as the primary and secondary water sources for this site. It is subsequently requested that the hydrometric data be provided for the water sources to ensure that the 16000 L annual draw will not pose any deleterious consequences to water system health.
2. The incineration of blackwater and controlled discharge of greywater appear to be appropriate for the small and temporary staffing requirements of the site. Clarification is sought, however, on the following items:
 - a. Sewer plans are identified on the G-1 FOX-3 Site Plan (Sheet 3 of 3). It is unclear if this sewer infrastructure has been entirely decommissioned and, if so, if any waste facilities remain on the site (i.e. effluent discharge points or abandoned lagoons).
 - b. The location of the current wastewater outfall/release site(s).
 - c. The contingency plan to be implemented for the disposal of wastewater in the event that the outfall does not meet the guidelines identified in Section 36 of the Exploration/Remote Camp Supplementary Questionnaire.
3. With respect to the designated landfill identified in Section 8 of the Water License Application Form, and Section 32 of the Exploration/Remote Camp Supplemental Questionnaire, the following information is requested:
 - a. Location and topography of the landfill site
 - b. The details of the landfill site construction.

- c. Predicted drainage patterns/volumes from the landfill site.
 - d. Anticipated incorporation, or lack thereof, of solid wastes into the permafrost.
 - e. Anticipated leachate monitoring. It is unclear if this is to be included as part of the effluent monitoring identified in Section 36 of the Exploration/Remote Camp Supplementary Questionnaire.
4. With respect to wastewater monitoring:
- a. It is presumed that the outfall monitoring identified in Section 36 of the Exploration/Remote Camp Supplementary Questionnaire supercedes the Section 4.3.1 of the project description, which states that no monitoring programs are to be conducted at the FOX-3 site. It is requested that the information contained in these sections be harmonized.
 - b. If additional monitoring programs have been implemented as allowed per Section 4.3.1 of the project description, it is requested that these be identified and described.
5. Due to the indeterminate nature of the proponents undertaking, no plans for abandonment and reclamation (A&R) plans were included in the current Water License application. It is therefore requested that the conditions under which an A&R plan will be submitted are identified.
6. The management of POLs on-site appears to be adequate, provided:
- a. All containment structures of all POL storage facilities are consistent with current standards.
 - b. Liquid waste placed in empty fuel barrels, as identified in Section 32 of the Exploration/Remote Camp Supplementary Questionnaire, is not released on site prior to treatment for hydrocarbon contamination.
7. Section 24 of the Exploration/Remote Camp Supplementary Questionnaire states that spill kit locations are denoted on site maps H-D67/2-8400-104 and H-D67/2-8400-105. It is requested that the locations of these kits be made more readily identifiable.
8. It is requested that Section 7 of the Exploration/Remote Camp Supplementary Questionnaire and the Supplementary Information Sections 2.4 and 4.1.6 be made consistent in their accounting of on-site staffing.

Please do not hesitate to contact me if there are any further questions or concerns.

Best regards,

A handwritten signature in black ink, appearing to read 'Stephanie Hawkins', with a stylized flourish at the end.

Stephanie Hawkins

Qikiqtani Regional Coordinator, Water Resources
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