



**Environment Environnement
Canada Canada**

Environmental Protection Operations (EPO)
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2 March 2009

Our File: 4717 000 025

Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0

licensing@nunavutwaterboard.org

Attention: Richard Dwyer

Re: NWB 3BC-FOD0409 – New Application - FOX-3 - Dewar Lakes – Nasittuq Corporation.

Environment Canada's (EC) contribution to your request for specialist advice is based on the mandated responsibilities under **Section 36(3)** of the *Fisheries Act*, the *Canadian Environmental Protection Act* (CEPA), the *Migratory Birds Convention Act* (MBCA) *Regulations* and the *Species at Risk Act* (SARA).

EC has reviewed the above noted new application for a, "Type B", water license for water use and waste disposal associated with activities in the Qikiqtani region of Nunavut. The application replaces the previous application requesting a name change from the Department of National Defence (DND) to Nasittuq.

Comments and Recommendations

EC has no concerns or issues with the name change from the Department of National Defence to Nasittuq Corporation to operate the North Warning System provided all terms and conditions of the original Water License, NWB 3BC FOD0409, apply to the new application for a "Type B" water license being applied for by Nasittuq Corporation.

EC has no issues with the mitigation measures outlined in the proponents Spill Contingency Plan. It should also be, noted that all releases of harmful substances regardless of quantity are to be reported to the NWT/NU Spill Line under the following circumstances:

- if the release is near or into a water body;
- is near or into a designated sensitive environment or sensitive wildlife habitat;
- poses imminent threat to human health or safety;
- poses imminent threat to a listed species at risk or its critical habitat;
- or is uncontrollable.

The proponent should also include copies of the NWT/NU Spill Report Form in the Spill Contingency Plan.

The proponent is proposing to dispose of non-hazardous solid waste in community landfills. Specifically waste from CAM-M and CAM-3 will be hauled to Cambridge Bay, waste from FOX-M and FOX-3 will be hauled to Hall Beach, and waste from DYE-M and BAF-3 will be hauled to Iqaluit. Additional information is needed regarding the types and quantities of waste that the proponent is proposing to dispose at community landfills. Are these community landfills designed to take this type of waste and do the landfills have the sufficient capacity to accommodate waste from these camps?

The proponent is considering onsite incineration as another waste disposal option. EC is developing a Technical Document for Batch Waste Incinerators. The technical aspects of the document focus on appropriate incineration equipment and best management practices required to achieve the Canada-Wide Standards for dioxins/furans and mercury. To assist the board, a draft copy of the executive summary of the technical document is provided. The board and the proponent are encouraged to contact EC for further information regarding the technical document.

The proponent shall not deposit, nor permit the deposit of any fuel, chemicals, wastes or sediment into any water body. According to the Fisheries Act, Section 36(3), the deposition of deleterious substances of any type in water frequented by fish,

or in any place under any conditions where the deleterious substance, or any other deleterious substance that results from the deposit of the deleterious substance, may enter any such water, is prohibited.

EC should be notified of changes in the proposed or permitted activities associated with this application.

Please do not hesitate to contact me at (867) 669-4744 or ron.bujold@ec.gc.ca with any questions or comments.

Yours truly,

Ron Bujold
Environmental Assessment Technician

cc: Carey Ogilvie (Head, EA-North, EPO)
Anne Wilson (Water Pollution Specialist, EA-North, EPO)
Carrie Spavor (Environmental Assessment Coordinator, EA-North, EPO)
Dave Fox (Air Pollution Management Analyst, EPO)