



Environment and
Climate Change Canada

Environnement et
Changement climatique Canada

Environmental Protection Operations Directorate
Prairie & Northern Region
5019 52nd Street, 4th Floor
P.O. Box 2310
Yellowknife, NT X1A 2P7

ECCC File: 6600 000 020 /009
NWB File: 8BC-FOD----

March 9, 2018

Via email at: licensing@nwb-oen.ca

Karen Kharatyan
A/Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0

Dear Mr. Kharatyan:

**RE: 8BC-FOD---- – Department of National Defence – FOX-3 Dewar Lakes Project –
Type B Water Licence Amendment and Renewal Application**

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above-mentioned water licence application and is submitting comments via email as requested by NWB. ECCC's specialist advice is provided based on our mandate, in the context of the *Canadian Environmental Protection Act* and the pollution prevention provisions of the *Fisheries Act*.

The following comments are provided:

Water Licence Amendment Application

1. The amendment application proposes to use portable field analytical equipment for water quality monitoring to reduce the time and monetary requirements of sending samples to be tested at an analytical laboratory. However, no details are provided on the type of field analytical equipment that is proposed to be used or the accuracy and detectability of the analysis as compared to laboratory analyzed samples.

ECCC recommends that the Department of National Defence (the Proponent) provide additional details on the proposed field analytical equipment to sample for the required parameters under the water licence. ECCC also recommends that the Proponent discuss the accuracy (including Quality Assurance/Quality

Control) and detection limits of the field analytic equipment as compared to laboratory.

Water Licence Inspection Report – July 20, 2016

2. The inspection report provided in the renewal application includes a report that the sewage effluent receiving sump may be overtopping the sides, allowing the sewage to flow directly into the environment.

ECCC recommends that the Proponent provide confirmation that this issue of sewage effluent overtopping the receiving sump has been resolved.

Should you require further information, please do not hesitate to contact me at (867) 669-4733 or Melissa.Pinto@canada.ca.

Sincerely,

[original signed by]

Melissa Pinto
Senior Environmental Assessment Coordinator

cc: Georgina Williston, Head, Environmental Assessment North (NT and NU)
ECCC Review Team
Major Ian Creighton, North Warning System Facilities Manager, Department of National Defence