



Water Resources Division
Nunavut Regional Office
Iqaluit, NU X0A 0H0

March 14, 2018

Richard Dwyer
Licensing Administrator
Nunavut Water Board
PO Box 119
Gjoa Haven, NU X0A 1J0

**Re: Indigenous and Northern Affairs Canada's Review of Department of
National Defence's Type B Water Licence amendment application for
water licence #3BC-FOD0919 – Fox 3 – Dewar Lakes**

Dear Mr. Dwyer,

Thank you for your February 12, 2018 invitation for review comments on the
above referenced application.

The Water Resources Division of Indigenous and Northern Affairs Canada
(INAC) examined the application and the results of our review are provided in the
enclosed memorandum for the Nunavut Water Board's consideration. Comments
have been provided pursuant to INAC's mandated responsibilities under the
Nunavut Waters and Nunavut Surface Rights Tribunal Act and the *Department of
Indian Affairs and Northern Development Act*.

INAC appreciates the opportunity to participate in this review. If there are any
questions or concerns, please contact me at (819) 953-8988 or by e-mail at
ian.parsons@canada.ca.

Sincerely,

Ian Parsons
Regional Coordinator, B.Sc.

Cc. Spencer Dewar, Director Resource Management, Nunavut Regional
Office, INAC
Erik Allain, Director of Lands, Nunavut Regional Office, INAC



Technical Review Memorandum

To: Karen Kharatyan, A/Manager of Licensing - Nunavut Water Board

From: Ian Parsons, A/Manager Water Resources Division - Indigenous and Northern Affairs Canada – Nunavut Regional Office

Re: Indigenous and Northern Affairs Canada's Review of Department of National Defence's Type B Water Licence amendment application for water licence #3BC-FOD0919 – Fox 3 – Dewar Lakes

Background

FOX-3 is a Long Range Radar Site (LRR) for the North Warning System. FOX-3 is an unmanned site, but it is visited by FOX-M (Hall Beach) staff on scheduled quarterly preventive and corrective maintenance trips and on an as needed basis. During the months of May to September the site may have an average of 5 to 20 personnel on-site due to seasonal project activity and occasional third party visitors.

FOX-3's facilities include site buildings with their integral mechanical and electrical systems, power generation system, fuel tanks, radar, antennas, satellite ground terminals, weather equipment, roads and airstrip.

The nearest communities to Fox 3 are Clyde River, 230 km to the northeast; Qikiqtarjuaq, 320 km to the southeast and Hall Beach, 410 km to the west.

Recommendations / Comments

1. Sewage Disposal

Comment: INAC has reviewed the entire application, including the July 20, 2016 inspection report. At this time INAC would like to know if adequate repairs have been undertaken to repair the breach in the sewage lagoon. As well, INAC would question the effectiveness of this lagoon given its size and the amount of untreated sewage it holds.

Discharging untreated sewage to the environment that is over effluent quality criteria is unacceptable.

Recommendation: INAC recommends that the applicant confirm if repairs to the sewage lagoon have been undertaken. In addition, all effluent discharges should be monitored and results confirmed against criteria in the water licence.



2. Spill Contingency Plan

Comment: In reviewing the application, INAC found that the application states that the required spill kits at site are located in the warehouse.

Recommendation: INAC recommends that the applicant should place the spill kits in appropriate locations to minimize the time it would take to go get the spill kits from the warehouse to the spill site. This would especially be true for bulk fuel resupply, refuelling situations and when people would be at site for extended periods. Therefore at minimum these spill kits should be placed in the vicinity of any and all refuelling activities or in other higher risk spill areas.

3. Landfarm

Comment: In reviewing the application, INAC found that the applicant only planned to have the landfarm in place until the remediation of the soil from previous spills was completed.

Recommendation: INAC recommends leaving the landfarm in place, in case of future spills. It would not be productive to have to build a landfarm every couple of years because of spills. Also the applicant is planning to be at site at minimum until 2035.

4. Duration of Licence

The licensee has only requested a new term of 10 years. Yet in the application documentation that applicant states that they will be at site until at least 2035. Given this statement INAC is not opposed to granting the applicant a 17 year licence until 2035. However INAC defers to the board for this determination.