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Our file: 4517 000 025
NWB file: 3BC-FOD0919

Richard Dwyer
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Via email at: licensingadmin@nunavutwaterboard.org

RE: 3BC-FOD0919 – FOX-3 Dept. of National Defence E1 O&M Plan Landfill, Handling of Solid Wastes

On behalf of Environment Canada (EC), I have reviewed the information submitted with the above-mentioned application. The following specialist advice has been provided pursuant to the *Canadian Environmental Protection Act*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

On behalf of the Department of National Defence, Nasittuq Corporation has submitted an Operations and Maintenance (O&M) plan for the Landfill and Handling of Solid Wastes at North Warning System Site FOX-3, Dewer Lakes. The site is located on Baffin Island, north of Dewer Lakes, at 68°40'48"N 71°14'48"W. FOX-3 is an unmanned site, but between May and September there may be an average of five to twenty personnel on-site for scheduled maintenance. Although an existing landfill is present at the site, all hazardous materials and waste generated will be flown to Hall Beach for disposal at the Hamlet's landfill. This plan is a requirement of the revised Water License 3BC-FOD0919.

Upon review of the Plan, EC provides the following comments and recommendations for the Nunavut Water Board's consideration:

- Environment Canada recommends that all potential products that are attractants to wildlife be made inaccessible to wildlife at all times. Camp waste can attract predators of migratory birds (e.g., foxes and ravens) to an area if not disposed of or stored properly.
- It is stated that there are no records of the solid waste deposited in the past in the landfill. As such, Environment Canada recommends that there be sampling of surface water (ponded water, standing water in proximity to landfills) and seepage areas to assess the landfill's performance the potential for environmental risk.

Previous comments and recommendations submitted by EC staff relating to the FOX-3 site would still apply. If there are any changes to the proposed plan, EC should be notified, as further review may be necessary. Please do not hesitate to contact me with any questions or comments with regards to the foregoing at (867) 975-4631 or by email at paula.c.smith@ec.gc.ca

Yours truly,

Original signed by

Paula C. Smith
Environmental Assessment Coordinator
Environmental Assessment – North
Environmental Protection Operations

cc: Carey Ogilvie (Head, EA-North, EPO, Yellowknife, NT)
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