



North Warning System Office
Department of National Defence
National Defence Headquarters
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Ottawa, Ontario
K1A 0K2

28 January 2018

Karén Kharatyan
Senior Technical Advisor / Acting Licensing Manager
Nunavut Water Board
P.O. BOX 119
Gjoa Haven, Nunavut
XOB 1J0

RE: 3BC-FOH0919, FOX-M Hall Beach Water Use Licence Renewal/Amendment

At the time of this renewal/amendment the Department of National Defence (DND) would like the Nunavut Water Board to consider updating a few of the historical Terms and Conditions associated with past Water Use Licences for FOX-M, Hall Beach.

Item	Location in Licence (3BC-FOH0919)	Current Clause	Requested Change
2.	Part B: #9	The Licensee shall submit <u>one paper copy</u> and one electronic copy of all reports, studies, and plans to the Board. Reports or studies submitted to the Board by the Licensee shall include a detailed executive summary in English and Inuktitut.	DND would like to only submit electronic copies of reports, studies and plans.



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Item	Location in Licence (3BC-FOH0919)	Current Clause	Requested Change																																		
3.	Part D: #10	<p>All discharge of Effluent at Monitoring Station FOH-3 (Fuel storage area) shall not exceed the following Effluent quality limits:</p> <table border="1"><thead><tr><th>Parameter</th><th>Maximum Concentration of any Grab Sample (µg/L)</th></tr></thead><tbody><tr><td>pH</td><td>6 to 9 (units)</td></tr><tr><td>Oil and Grease</td><td>5000</td></tr><tr><td>Arsenic (total)</td><td>100</td></tr><tr><td>Cadmium (dissolved)</td><td>10</td></tr><tr><td>Chromium (dissolved)</td><td>100</td></tr><tr><td>Cobalt (dissolved)</td><td>50</td></tr><tr><td>Copper (dissolved)</td><td>200</td></tr><tr><td>Lead (dissolved)</td><td>50</td></tr><tr><td>Mercury (total)</td><td>0.6</td></tr><tr><td>Nickel (dissolved)</td><td>200</td></tr><tr><td>PCB (total)</td><td>1000</td></tr><tr><td>Phenols</td><td>20</td></tr><tr><td>Zinc (total)</td><td>500</td></tr><tr><td>Benzene</td><td>370</td></tr><tr><td>Toluene</td><td>2</td></tr><tr><td>Ethylbenzene</td><td>90</td></tr></tbody></table>	Parameter	Maximum Concentration of any Grab Sample (µg/L)	pH	6 to 9 (units)	Oil and Grease	5000	Arsenic (total)	100	Cadmium (dissolved)	10	Chromium (dissolved)	100	Cobalt (dissolved)	50	Copper (dissolved)	200	Lead (dissolved)	50	Mercury (total)	0.6	Nickel (dissolved)	200	PCB (total)	1000	Phenols	20	Zinc (total)	500	Benzene	370	Toluene	2	Ethylbenzene	90	<p>FOH-3 represents the discharge point of accumulated water from the fuel storage bermed area. DND requests that the parameters analyzed be directly correlated with the presence of hydrocarbons.</p> <p>Field screening could be used to determine if berm water meets with the discharge criteria; saving the requirement to transport samples to an analytical laboratory, awaiting results, chartering a plane to return to the site and subsequently discharging the berm water.</p> <p>Historical analytical data (2010-2018) for the berm water at FOX-M does not indicate the presence of any of the analytes listed in the parameters of the licence.</p>
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4	Part I: #8	<p>The Licensee shall within ninety (90) days following issuance of the Licence, submit to the Board a Quality Assurance / Quality Control (QA/QC) Plan. The Plan shall be include up to date field sampling methods to all applicable standards, acceptable to an accredited laboratory as required by Part I, Item 6 and Part I, Item 7. The Plan shall include a covering letter from the accredited laboratory confirming acceptance of the Plan for analyses to be performed under this Licence.</p>	<p>This information has previously been provided to the NWB. DND requests that this clause be removed from the future licence.</p>																																		
5	N/A	N/A	DND requests the ability to conduct land farm operations on-site. A generic Landfarm Plan has been included in the relicensing package.																																		

The following documents are being submitted as the Water Licence Renewal Package for FOX-M:

- Application for Water Licence Amendment 3BC-FOH0919
 - Annex A1 - NPC File 148954, 3BC-FOH0919 Renewal - NIRB Screening Required (26Oct2018)
 - Annex A2 - 181221-03DN013-NIRB Screening Decision Report-OT8E
 - Annex A3 - FOX-M Landfarm Plan
 - Annex A4 - Berm Water Sampling QAQC Plan
 - Annex A5 - 170925 3BC-FOH0919_AUGUST_2017_INSPECTION_REPORT-ILAE

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- Annex A6 - NWB Licence Compliance Assessment
- Remote Camp Supplementary Questionnaire 3BC-FOH0919
 - Annex Q1 - 3BC-FOH0919 Executive Summary
 - Annex Q2 – Spill Contingency Plan (PLN-EHS-2)(Rev.5)
 - Annex Q3 – FOX-M Site Description
 - Annex Q4 – FOX-M Site Plan
 - Annex Q5 – Jet A1 SDS

Should you have any additional questions or require further clarification please contact, Will Wyman, Raytheon Canada Limited, by phone at 613-787-3655 or email William.wyman@raytheon.com.

Regards,

A handwritten signature in black ink that reads "Chris Greaves".

Major Chris Greaves

Officer Commanding, Det NWS, Real Property Operations (North)

Date: 28 Jan 19

The word "Canada" is written in a large, bold, serif font. A small red maple leaf symbol is positioned above the letter "a".