



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

Your file - Votre référence

3BC-BAF0919, 3BC-CAM0919, 3BC-DYE0919, 3BC-FOH0919, 3BC-SHE0919

February 19, 2019

Our file - Notre référence
CIDM# 1241957

Richard Dwyer
Manager of Licensing
Nunavut Water Board
Gjoa Haven, NU X0B 1J0

Sent via email: licensing@nwb-oen.ca

**Re: Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)
comments on the Department of National Defence's (DND) North Warning
System sites BAF – 3, CAM – 3, DYE - M, FOX – M and CAM - M.**

Dear Mr. Dwyer,

Thank you for the email notice, received on February 7, 2019, requesting comments on 5 of DND's North Warning System sites. These sites are known as BAF-3, CAM-3, CAM-M, DYE-M and FOX – M.

CIRNAC reviewed these 5 applications and have provided comments pursuant to its mandated responsibilities from the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

Background

The North Warning System consists of a sequence of radar sites operating across the northern and eastern coasts of Canada from the Yukon in the west to the southern Labrador coast in the east.

There are a total of eleven (11) Long Range Radar (LRR) sites in the Canadian NWS. Two of these sites have radar and support sites combined in one facility. These sites are referred to as LRR/LSS stations and are each staffed by approximately ten people. The remaining nine sites are not permanently staffed. They are operated via remote monitor & control and local automation. The five sites being reviewed here fit into this category. The LRR site facilities consist of building groups which include: accommodations, technical services, power generation system, fuel tank farms, radar towers, satellite ground terminals, weather compounds, helipads, roads, and beach fuel tanks.





Results of Review

CIRNAC has reviewed the applications for all five sites and have combined all comments here since all the plans associated with the renewal applications are essentially the same.

CIRNAC finds the application packages of all five sites to be very well put together and only has three general comments

General Comments

i) Spill Plan

Comment: Although the spill plan in general is well organized and put together, the spill response system only had position titles. CIRNAC could find no names or phone numbers in the spill plan of who was in charge, who to contact and how to contact.

Recommendation: CIRNAC recommends that the Licensee add the names, contact information and phone numbers of who to contact in case of a spill. It is pertinent for the licensee and government departments to know who to contact (CIRNAC, DFO, ECCC).

ii) Water Quality Monitoring

Comment: The licensee is asking for changes in discharge criteria. Although CIRNAC is not against any change to discharge criteria it will be deferring to Environment and Climate Change Canada for comments and direction in this area.

iii) Water use (CAM-M)

Comment: The licensee is requesting an annual use of 3650 cubic meters of water instead of the daily use of 10 cubic meters for CAM-M only.

Recommendation: CIRNAC has no issue with this as long as the licensee is aware of the 300 cubic meters per limit for type b licenses. Also the licensee would still have to record daily use of water volume, including how much water has been pumped on a daily basis.

iv) Documentation

Comment: Some of the documentation and associated plans contained in the 5 separate application packages does not list all of the sites being reviewed. For instance the QA/QC Plan for Berm Water Sampling does not list BAF-3, however the BAF-3 renewal application package has this as one of its plans for review.



Recommendation: CIRNAC recommends that the licensee ensure that the documentation being submitted is relevant to the license and site being reviewed and if so ensure that these license and sites are referenced in the documentation.

If you have any questions or require further information with respect to this matter, contact me at (867) 222-9278 or email ian.parsons@canada.ca, or Godwin Okonkwo at (867) 975-4550 or email godwin.okonkwo@canada.ca.

Regards,

Ian Parsons
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