



Our reference
File #9545-2-1.3BC.KARA
CIDMS #414348

July 13, 2010

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board
Gjoa Haven, Nunavut
X0E 1J0

Your reference
3BC-KAR0812

Sent Via Email

Dear Phyllis,

**Subject Water License #3BC-KAR0812, Canadian Wildlife Service of
Environment Canada, Karrak Lake Project, Kitikmeot Region,
Amendment Application**

Please be advised that on behalf of Indian and Northern Affairs Canada, I have completed a review of the above referenced Canadian Wildlife Service of Environment Canada submission to the Nunavut Water Board.

A Technical Review Memorandum (attached) is provided to the Board for consideration.

Should you have any questions regarding this submission, feel free to contact me at 867 975-4555 or david.abernethy@inac-ainc.gc.ca.

Regards,

David W. Abernethy
Water Resources Regional Coordinator
Operations Directorate, Nunavut Regional Office
Indian and Northern Affairs Canada
Iqaluit, Nunavut
X0A 0H0

Attached.

Cc: Lou-Ann Cornacchio, INAC Water Resources Manager
Peter Kusugak, INAC Field Operations Manager
Melissa Joy, INAC Water Resources Officer

TECHNICAL REVIEW MEMORANDUM

Date: July 13/10

To: Phyllis Beaulieu, Nunavut Water Board

From: David Abernethy, Indian and Northern Affairs Canada

Re: **Water License #3BC-KAR0812, Canadian Wildlife Service of Environment Canada, Karrak Lake Project, Kitikmeot Region, Amendment Application**

A. PROJECT DESCRIPTION

On June 14/10 the Nunavut Water Board (NWB or Board) distributed the Canadian Wildlife Service of Environment Canada (CWS) Mar. 27/10 license amendment application to allow for the use of water and disposal of waste associated with a new cabin in their Karrak Lake project area. The NWB requested representations from interested parties by July 14/10.

The CWS proposes that a new cabin be constructed 15 kilometers northwest of their existing camp to facilitate their research on the population ecology of arctic-nesting water fowl. Fresh water will be consumed from the Karrak Lake outflow drainage, commonly referred to as the North Karrak Lake River, for domestic purposes only. This cabin will accommodate up to 6 people and will be periodically throughout the project's annual field seasons (May 1 to August 31). The CWS has not proposed any changes to their existing license terms and conditions. As requested by the NWB, the CWS included a revised Abandonment and Restoration Plan, a revised Spill Contingency Plan, and monitoring information for 2009 in their license amendment application.

B. RESULTS OF REVIEW

On behalf of Indian and Northern Affairs Canada (INAC), I am providing the following comments / recommendations for the Board's consideration,

1. General

- INAC is not opposed to the CWS's proposed use of water and disposal of waste associated with the construction of a new cabin provided that they follow their current license terms and conditions.

2. Waste Management

- The submitted supplementary questionnaire states that combustible waste materials, including waste oil and hazardous wastes, will be burned in 45 gallon drums/burn barrels and the remaining ash will be buried in pits. Open burning is not a form of incineration. Any incineration of solid waste should be conducted in accordance with Environment Canada's March 2009 "Technical Document for Batch Waste Incineration." Alternatively, the CWS can backhaul their waste material to an approved waste management facility for proper disposal. Furthermore, the CWS must backhaul all hazardous waste materials, waste oil, and non-combustible waste materials generated by project activities to an approved waste disposal facility as specified in Part D, Item #4 of their license.

3. Spill Prevention and Contingency Planning

- The submitted Spill Contingency Plan makes reference to the open burning of recovered absorbent materials. As stated above, all recovered hazardous waste materials must be backhauled and disposed of in an approved waste disposal facility. This plan should be revised accordingly.
- The Spill Contingency Plan should include a complete list of the emergency spill response kit contents and any other equipment or materials that can be mobilized when responding to fuel and hazardous material spills.
- The submitted Spill Contingency Plan makes no reference to fuel and hazardous material spill prevention measures. EC-CWS must ensure that all fuel caches, fuel transfer areas, and hazardous material storage areas are equipped with secondary containment. This plan should be revised accordingly.
- The submitted Spill Contingency Plan should be revised to include a more detailed site map(s) that references all fuel and hazardous material storage areas, fuel transfer areas, spill response equipment, building structures, and surrounding water bodies (including drainage basins).

4. Abandonment and Restoration Planning

- The submitted Abandonment and Restoration Plan should be revised to include progressive reclamation, seasonal, and interim closure procedures.

Prepared by David Abernethy