



03 July 2019

Nunavut Water Board
PO Box 119
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Response to CIRNAC Review Questions for Water Licence Renewal Application #8BC-NNF1418 - Nanisivik Naval Facility Construction Project

On behalf of Department of National Defence (DND), Defence Construction Canada is responding to the questions submitted by the Nunavut Water Board (NWB) from Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) regarding the DND application for a water licence renewal at the Nanisivik Naval Facility Construction Project.

CIRNAC Questions and DND Responses:

1. General

Comment:

The applicant states that they have been using the Hamlet of Arctic Bay community infrastructure for fresh water and waste services. They have also indicated they if there is hardship stemming from this relationship on the community's infrastructure then alternate options are available; such as using East twin lake as a potable water source.

Recommendation:

CIRNAC would like the applicant to provide evidence that the use of the Hamlet of Arctic Bay's infrastructure is not burdening the Hamlet's resources. Such as drawing down the communities' water supply.

DND Response:

A letter from the Hamlet to the contractor for the supported use of water and waste water services is attached. The arrangement for the purchase of fresh water and the disposal of waste water between the contractor and the Hamlet has worked well from the beginning of the project. The contractor has their own fresh water and waste water trucks, so no burden is placed on the community's resources. The Hamlet has never indicated any concerns or identified a problem with the arrangement.

2. General – Water Source

Comment:

The applicant states that if they need to they can use potable water from East Twin lake, the same source that the former Nanisivik Mine used.

Recommendation:

CIRNAC would like to know if DND has used this lake for potable water since they have been on site for a variety of reasons. (i.e. Water truck breakdown, weather, etc)

DND Response:

No, this contingency was never utilized.

Recommendation:

CIRNAC would also like to know if DND completed hydrostatic testing on any of their tanks and where they sourced the water.

DND Response:

Yes, this was completed in 2017. Sea water from Strathcona Sound (Arctic Ocean) was sourced for the testing.

3. Operation & Maintenance (O&M) Plan for the Naval facility

Comment:

The applicant stated in their original water licence application that the O&M plan will be developed by the contractor in future years.

Recommendation:

CIRNAC reminds the licensee that unless otherwise stated in their water licence that they submit an O&M plan at least 90 days prior to the start-up of the facility to allow for adequate time for review and approval of the plan.

DND Response:

Acknowledged. An O&M plan will be submitted at least 90 days prior to the start-up of the facility. The infrastructure is not yet in operation and the contractor is currently preparing all the site manuals. These are currently in draft form.

4. Spill Contingency Plan

Comment 1:

There is no clear information of an updated spill contingency plan.

Recommendation:

CIRNAC did not find a spill contingency with the application or any reference to a previously approved plan. CIRNAC advises that the applicant provide an update to NWB on their updated spill plan.

DND Response:

The contractor has care custody and control of the site until the completion of the construction phase of the project. The contractor's EPP includes a spill response plan (attached). Following a switch to the operations phase of the project a revised spill plan will be forwarded.

Comment 2:

The licensee did not indicate contaminated soil as a waste in its application.

Recommendation:

CIRNAC would like the licensee to indicate if they have had any spills in the past 5 years and what was done to clean the spill and location where the contaminated soil/products are stored.

DND Response:

The contractor has care custody and control of the site until the completion of the

construction phase of the project. There have been minor spills (not reportable volumes) during construction. There was no impact to water for any of the spills, all impacted soil was removed and either shipped to the south for disposal or treated on-site in the CanZino remediation area. Minor spills have been detailed in the yearly reports to NWB.

5. Abandonment & Restoration (A&R) Plan for the Naval facility

Comment:

The applicant has indicated that the contractor will be responsible for the decommissioning of the construction camp and facilities that will no longer be required once the naval facility is operational. However, there is no mention of an A&R Plan for the naval facility and its associated structures (i.e., tank farm, dock and all other associated structures).

Recommendation:

CIRNAC recommends that the applicant submit a preliminary A&R plan for the entire Nanisivik Naval Facility to the NWB for review and approval before the site becomes operational.

DND Response:

Acknowledged. DND will provide NWB with a preliminary A&R plan for the Nanisivik Naval Facility prior to the site becoming operational.

6. Disturbance of reclamation work by Nyrstar

Comment:

CIRNAC would like to indicate to DND and the NWB that there is another stakeholder in the area (Nyrstar) who currently has valid permits in the area. CIRNAC would like to remind DND to be diligent when working and or travelling in other areas outside of the immediate area of the Nanisivik Naval Facility as previous reclamation works have been completed, in order to avoid any disturbances.

Recommendation:

CIRNAC recommends that DND communicate with the NWB and Nyrstar if they need to use East Twin Lake for potable water usage.

DND Response:

Acknowledged. DND will communicate with the NWB and Nyrstar if potable water from the East Twin Lake is required.

This letter is to respond to the comments and recommendations provided by CIRNAC as part of the review of the DND water licence application and approval process.

Should you require any additional information please do not hesitate to contact me.

Sincerely,



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