



May 24, 2019

Bijaya Adhikari
Science and Regulatory Coordinator
Inuvialuit Water Board
P.O. Box 2531
125 Mackenzie Road
Suite 302, Professional Building
Inuvik, NT X0E 0T0

**Re: Environment and Climate Change Canada
Water Licence Application – N5L8-1840
Waste Management Plan
Spill Contingency Plan
Erosion and Sediment Control Plan
Request for Review and Comments**

Dear Mr. Adhikari,

The Department of Environment and Natural Resources (ENR), Government of the Northwest Territories has reviewed the plans at reference based on its mandated responsibilities under the *Environmental Protection Act*, the *Forest Management Act*, the *Forest Protection Act*, the *Species at Risk (NWT) Act*, the *Waters Act* and the *Wildlife Act* and provides the following comment for the consideration of the Board.

Topic 1: Project Outstanding Information

Comment(s):

As specified in the project summary, Mould Bay was first established by Canadian and American governments in 1948 as 1 of 5 High Arctic Weather Stations. Mould Bay represents one of the least accessible locations in Canada, and is only accessible by air and not by sealift or icebreaker due to an ever-present ice pack. As Mould Bay station was no longer manned and became automated in 1997, the station fell under disrepair, and the causeway connecting the main airstrip to the weather station that has been washed out is to be repaired as part of the current project.

ENR notes that the following Project information/items have not yet been specified or provided:

- Waste Management Plan (WMP) p. 24 of 146 - Fuel Storage Specifications;

- Spill Contingency Plan (SCP) p. 16 of 130 - Satellite phone number for Brandon MacKay and Benoit Lefebvre within the Emergency Contact Call-Down;
- SCP p. 17 of 130 - Additional off-site resources will become available prior to mobilization; and
- WMP (as per Section 5) - Acceptance Letter from Final Receiving Facilities for:
 - 1) Inuvik landfill (for non-hazardous and non-combustible wastes),
 - 2) The Approved municipal sewage disposal facility (for sewage),
 - 3) The Approved Hazardous Waste Disposal Facility for all other operation wastes (empty barrels, petroleum, oils and lubricants, liner, geotextiles and cover tarps, spill containment material).

Recommendation(s):

- 1) ENR recommends that all outstanding information indicated, but not limited to the items outline above, be provided to the Board with sufficient time prior to mobilization as deemed necessary to ensure integration in the project.

Topic 2: Project Clarifications

Comment(s):

Section 4.1.2 specifies that all camp-generated hazardous wastes, as well as any recyclables and material which cannot be burned [on-site] will be packaged, backhauled to Inuvik and/or Yellowknife and shipped to an approved waste management facility for disposal.

Information provided in the Closure and Reclamation Plan (CRP) during the March 2019 review, specified that wastes retained on site would consist of greywater sumps and scrap metals (p. 117 of 158, document #190222). ENR notes that the WMP outlines that inert material such as scrap/old culverts and drums will be crushed if possible, and stockpiled near the weather station for future removal.

During March 2019 review, it was further specified in the CRP (under ‘Revisions’) that the CRP may be subject to revision following initial approval by Regulatory Authorities.

In section 4.1.2 of the current WMP (p. 16 of 146), it is stated that the Temporary Storage Area (TSA) will be located “at the work site, *least* 100 m from the ordinary high-water mark of any watercourse.”

Recommendations:

ENR recommends that the following clarifications be submitted to the Board:

- 1) Hazardous waste(s) types that will be burned on-site, if any;
- 2) Waste type(s) that will be left on-site for future removal once project is completed, and if any, when removal of these waste(s) is anticipated in the future;
- 3) Project's activities that will be occurring within 100 m from Ordinary High-Water, if any; and
- 4) If changes to planned closure and reclamation activities will be submitted to the Board for approval (within potential subsequent CRP revisions, if any).

Comments and recommendations were provided by ENR technical experts in the Water Management and Monitoring Division and the Inuvik Region and were coordinated and collated by the Environmental Assessment and Monitoring Section (EAM), Environmental Stewardship and Climate Change Division.

Should you have any questions or concerns, please do not hesitate to contact Patrick Clancy, Environmental Regulatory Analyst at (867) 767-9233 Ext: 53096 or email patrick_clancy@gov.nt.ca.

Sincerely,



Patrick Clancy
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