



CIRNAC Comments to NIRB

Re: Notice of Screening for Environment and Climate Change Canada's "Landfarm, Solid Waste Non-Hazardous Facility, Water and Sewage Treatment Infrastructure Upgrades for the Eureka High Arctic Weather Station" Project Proposal



Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence
21XN012
Our file - Notre référence
93623996

April 8, 2021

Mia Otokiak
Junior Technical Advisor
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0
Via NIRB public registry

Re: Notice of Screening and Comment request for Environment and Climate Change Canada's "Landfarm, Solid Waste Non-Hazardous Facility, Water and Sewage Treatment Infrastructure Upgrades for the Eureka High Arctic Weather Station" Project Proposal

Dear Mia Otokiak,

On March 18, 2021 the Nunavut Impact Review Board (NIRB) invited parties to comment on Environment and Climate Change Canada's "Landfarm, Solid Waste Non-Hazardous Facility, Water and Sewage Treatment Infrastructure Upgrades for the Eureka High Arctic Weather Station" project proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) appreciates the opportunity to provide comments and offers the responses below as it pertains to the NIRB's request:

Whether the Project is of a type where the potential adverse effects are highly predictable and mitigable with known technology, (please provide any recommended mitigation measures);

CIRNAC #1: Landfarm and Solid Waste Facility

The Project proposal includes the establishment of a landfarm facility to treat hydrocarbon contaminated soils, as well as the creation of a solid non-hazardous waste disposal facility. CIRNAC notes that the project application indicates that the landfarm and solid non-hazardous waste facility locations will be identified in 2021, but otherwise, there are few details related to the solid non-hazardous waste facility and landfarm.

CIRNAC recommends that the Proponent consider including the following measures for activities related to the solid non-hazardous waste facility to aid in mitigation of potential environmental effects:



- Ensure that appropriate dust suppression measures are carried out if needed during soil topping of solid non-hazardous waste facility materials, or solid non-hazardous waste facility capping;
- Ensure that staff is adequately trained prior to commencement of solid non-hazardous waste facility operations, and ensure all staff are aware of all operational guidelines and commitments;
- Carry out active management of rainwater and any leachate, and establish collection/treatment system, during operations, if deemed necessary;
- At closure, capping the solid non-hazardous waste facility with a thick cover which has been shown to be free of acid generation or metal leaching properties; and,
- Conduct long-term monitoring of the site to ensure stability of solid non-hazardous waste facility facilities.

Further, for the proposed landfarm, CIRNAC recommends that the Proponent consider including the following measures to aid in mitigation of potential environmental effects:

- Ensure that staff is adequately trained, and made aware of all operational guidelines and commitments, prior to commencement of landfarm operations;
- Minimize the environmental footprint of the landfarm facilities;
- Clean off any equipment used for aeration in the landfarm operation within the landfarm facilities prior to use elsewhere;
- Ensure appropriate dust suppression measures are carried out as appropriate during soil turning and removal;
- Treat only petroleum and hydrocarbon contaminated soils at the landfarm facility;
- Ensure any materials contaminated with other substances, such as glycol and heavy metals, are disposed of at an authorized facility;
- Provide adequate containment to ensure that contact waters do not enter surface or groundwaters; and,
- Ensure that any non-compliant discharge water is not released into the environment.

Any matter of importance to the Party related to the project proposal:

CIRNAC #2: Waste Management Table

In the Waste Management Table of the project application, the Proponent indicates that about 40, 000L of combustible waste (food and paper waste) created at the camp site, will be incinerated, and the ashes deposited in a non-hazardous waste facility and capped. A second line for combustible wastes (5,000lb) in the Camp would also be incinerated, but no other treatment procedures are listed.

Further, the Waste Management Table indicates that the Site Cleanup/Remediation project activity will create more combustible wastes with an estimated volume of 31.5m³,



with a method of disposal listed as 'solids, sludge from the treatment facility'. This line indicates 'n/a' under Additional treatment procedures.

The Non-technical project proposal description states that "construction of a landfarm is required to store and treat an estimated amount of 4,500-6,000m³ of contaminated soil". CIRNAC notes that these hydrocarbon contaminated soils are not listed in the waste management table.

CIRNAC recommends that the Proponent:

- Provide a rationale for not including the 4,500 m³ – 6,000 m³ hydrocarbon contaminated soils waste in the waste management table, given that the proposed activities include creation of a landfarm to remediate the contaminated soils;
- Clarify how the 5,000 lbs of combustible waste produced at the camp will be disposed of; and,
- Clarify the treatment and disposal method of the expected 31.5m³ of combustible waste created from Site Cleanup/Remediation activities.

CIRNAC #3: Demolition Work and the Environmental Protection Plan

In the Identification of Impacts and Proposed Mitigation Measures section, The Proponent states, "Demolition work will be completed by methods that minimize dust generation from operations, in accordance with the Environmental Protection Plan."

The Environmental Protection Plan does not seem to be attached to the Project Application in the NIRB registry. It is unclear if the Environmental Protection Plan will be provided to the NIRB for interested parties to comment on prior to commencement of activities. CIRNAC notes that provision of the Environmental Protection Plan for interested parties to comment on prior to commencement of activities can potentially lower the risk involved in potential project activities.

CIRNAC #4: Potential for Positive Effects to Inuit Through Employment and Training Opportunities

CIRNAC recommends that the Proponent prioritize the employment and training of local Inuit when implementing project activities. Such efforts will allow for positive effects to be realized by community members and the local Inuit population. Members of the community of Grise Fiord, the community in closest proximity to the project, should be prioritized in any project-related employment and training opportunities that may be made available.

CIRNAC #5: Consultation with Interested Parties

CIRNAC recommends that the Proponent maintain open communication with the Hamlet of Grise Fiord and the Iviq Hunters and Trappers Organization, as well as other community members and organizations which may have an interest in the project's activities. Issues that should be considered as part of any consultation activities include:



- Incorporation of Inuit knowledge or Inuit Qaujimajatuqangit into project activities;
- Mitigation measures designed to prevent any disturbance to wildlife and the environment;
- The experience of community members who participate in traditional and non-traditional activities in close proximity to the project area;
- Training and employment opportunities for community members;
- Regular updates on the status of project activities.

CIRNAC appreciates the opportunity to provide comments and looks forward to working with the NIRB and the Proponent throughout any further review phases related to this project. Should you have any questions, please contact Richard Bingley at (867) 975-4556 or by e-mail at Richard.Bingley2@Canada.ca.

Sincerely,



Felexce Ngwa
Manager, Impact Assessment

