



April 26, 2021

Mia Otokiak
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Nunavut Impact Review Board
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VIA EMAIL

Subject: Response to CIRNAC Information Requests (210409-21XN012)

Dear: Mia Otokiak,

On behalf of Environment and Climate Change Canada (ECCC), please find enclosed our responses to Crown- Indigenous Relations and Northern Affairs Canada (CIRNAC)'s information requests pertaining to ECCC's "Landfarm, Solid Waste Non-Hazardous Facility, Water and Sewage Treatment Infrastructure Upgrades for the Eureka High Arctic Weather Station" (HAWS) Project (the Project) Proposal.

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 nonhazardous waste facility capping;*
- *Ensure that staff is adequately trained prior to commencement of solid nonhazardous 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 nonhazardous 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.*

ECCC #1: Response

ECCC appreciates the recommended mitigation measures proposed by CIRNAC for the proposed solid non-hazardous waste facility and landfarm. The suggested mitigation measures will be considered for integration into the Project's planning phase.

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.*

ECCC #2: Response

The Waste Management Table represents waste associated with the Camp and Site Cleanup/Remediation activities. Hydrocarbon contaminated soils are not waste; the intent is to remediate the soils.

The 5000 lbs of combustible wastes ash will be deposited in the existing solid waste facility.

The expected 31.5 m³ of waste's treatment and disposal method are still within design stages; however, it is anticipated that waste will be de-watered and disposed in either the existing solid waste facility or off-site, at an approved location.

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.

ECCC #3: Response

The aforementioned plan will be part of the construction tender process and a requirement for the successful contractor to provide, to ensure compliance with regulations and execution of mitigation measures.

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.

ECCC #4: Response

On January 19, 2021, Project information was provided to the community of Grise Fiord and the Iviq Hunters and Trappers Organization (HTO) as recommended by NIRB on September 4, 2020. On March 9, 2021, notification letters describing the proposed archaeological impact assessment work were also sent to the Qikiqtani Inuit Association and the Iviq HTO.

Local Inuit individuals will be hired to provide ongoing wildlife monitoring and support during the archaeological impact assessment, as well as throughout the duration of the project. Furthermore, these

groups, as well as other interested organizations, communities and Inuit businesses, will also be further notified prior to any procurement/employment opportunities being made public.

Projects awarded through PSPC are required to follow Article 24 (Government Contracts) of the Nunavut Land Claims Agreement. All procurements where the deliverables of a contract, or even a portion of them, are to be delivered or performed in the Nunavut Settlement Area (NSA), must follow the prescribed procurement measures contained in the [Directive on Government Contracts, including Real Property Leases in the Nunavut Settlement Area](#).

All contractors bidding on the Project will be asked to provide an Inuit Benefits Plan (IBP) with their proposal. The plan should demonstrate how they will provide employment, training and sub-contracting opportunities for Inuit community members and businesses through the course of the project. The IBP will be worth between 30 to 35 percent of the proposal's point rated evaluation. Once the contract is awarded, the winning bidder's plan becomes part of their contract deliverables and will be monitored and reported annually.

CIRNAC #5: Consultation with Interested Parties

CIRNAC recommends that the Proponent maintain open communication with the Hamlet of Grise Fiord, the Iviq Hunters and Trappers Organization, community members, and local organizations that have an interest in project activities. Issues that should be considered in 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; and*
- *Regular updates on the status of project activities.*

ECCC #5: Response

Please refer to ECCC #4 Response.

In the annual updates, communities, the HTO, and any other interested parties will have the opportunity to comment if they want to contribute or participate in traditional and non-traditional activities in close proximity to the Project.

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With the exception of personal information, all comments will become part of the public record.

Best Regards,

Asif Mohammed