



NWB Tools

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[Licensing] 1AR-NAN1419 - Comments of 2014 Annual Report

1 message

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Tue, May 12, 2015 at 8:28 AM

To: licensing@nwb-oen.ca

Cc: sean.joseph@nwb-oen.ca

Dear Ms. Beaulieu,

The Department of National Defence (DND) would like to thank you for this opportunity to comment on the technical components of the 2014 Annual Report.

DND is providing comments on *Nanisivik Mine, Contaminated Soil Remediation, 2014 Progress Report* and on *Update to Soil Quality Remediation Objectives for the Former Nanisivik Mine*. Please, find DND's comments below and within the attached document.

Comments on the report: *Nanisivik Mine, Contaminated Soil Remediation, 2014 Progress Report*, SRK Consulting (Canada) Inc., March 2015

- 1- Lab certificates are not incorporated within the report.
- 2- Recommended SSRO undergoing review by NWB. DND asked PWSGC to review this document. Comments are provided in the attached document.
- 3- Section 4.4 mentions water sampling of station 159-6, for which results can be found within the water quality monitoring report. It also mentions sampling of water that had ponded in Area 4 and within the lines sump on the pad for which location of results can't be found in either the 2 reports (Soil remediation and Water Quality monitoring). Results are to be provided along with the laboratory certificates of analysis. Would be great to also include the result from station 159-6 within the Contaminated Soil Remediation Report so that it is a stand-alone document.
- 4- Figure 5-2 on page 11 is very confusing. On the bottom axis, what week does the number correspond to? Are these weeks only for one summer or over multiple summers?
- 5- Section 5.4.1, By reading this, it is our understanding that only 2 areas are requiring additional excavation. Does these 2 areas cover all the areas where exceedances have been observed? It does not seem like it. There is reference to the east wall of Area 1 which I assumed corresponds to 2 samples 15423-W and 15426-W and there is also reference to an area at the junction of area 2 and area 3, samples 15382-F and 15388-W. When looking at figure 5, there is also an exceedance at sample 15429-W, wall of the excavation, berm area. This would be a third area that is requiring additional excavation.
- 6- Section 7, A large volume of soil will be off-loaded to the secondary containment area. What will Nyrstar/SRK do with this soil after it is placed there? The area is needed by DND for the construction project. Nyrstar/SRK needs to make sure to stay outside the area that has been identified by DND for the construction project.

7- Section 7, "*Biopiles are not to be off loaded without confirmation that soil meets the SQROs unless the soil is destined for further management on the concrete pad.*" That being said in the report, it is very important to keep in mind that access to the concrete pad is only until August 1, 2015. All soil need to be remove and the concrete pad returned to its original conditional by August 1, 2015.

8- There is no mention on where the soil store on the concrete pad will end up.

9- There is no mention of the excavation depth.

10- Comments on tables and figures:

a. Some samples listed within the tables do not show up on the figure. (example Table 6 p. 3, sample names 14816, 14818, 14821, 14836)

b. Table 6, p.5, same sample name 15387 is repeated 3 times with different chemical results. I suspect a transcription error.

c. Table 4 says that sample 15428-W-Q is duplicate of 15426-W-D but figure 5 shows 15428 is duplicate of 15427. Also, based on the legend, it should be blue as the concentration is 410ppm for F2.

d. On figure 5, we can see 4 sample points 11013-W, 11014-W, 11015-W and 11016-W but there is no information within the report in regards with those samples (depth of samples, chemical results, lab certificates).

Questions for the NWB:

1- Report is written assuming that the recommended SSRO for PHC F2 will be approved by the NWB. When will the NWB make the decision about the approval of the recommended SSRO as described within the report "*Soil Toxicity Testing and the Derivation of the Site Specific Soil Remediation Objectives (SSROs) for the Nanisivik dock site*". The decision that will be made will influence the entire work for this coming field season starting in few weeks.

We appreciate this opportunity to comment. If you have any questions or require clarifications, please contact Johanne Paradis at [\(613\)947-3930](tel:6139473930).

Yours truly,

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