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## 1BR-CIL1217

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**Brady MacCarl** <brady.maccarl@nwb-oen.ca>  
To: MLusty@gov.nu.ca  
Cc: Megan Porter <megan.porter@nwb-oen.ca>

Wed, Oct 8, 2014 at 8:51 AM

Megan,

Thank you for the submission of the 2012 and 2013 annual reports regarding licence 1BR-CIL1217. Both of the reports conform to licence requirements in most respects.

### 2012 Annual Report:

- It is recognized that no soil or water quality monitoring occurred nor results submitted as the land farm was not yet commissioned.

### 2013 Annual Report:

- It is recognized that no apparent effluent was discharged from the landfarm, and as such sampling did not occur at CIL-1. Also, it is recognized that no groundwater wells were installed by the licensee--as they were not required--and as such sampling at CIL-2, CIL-3 and CIL-4 became redundant.

- It is recognized that multiple exceedances were recorded of BTEX and F1 in the soil samples. As such, it is understood that remediation of the soil will continue contamination concentrations are within CCME guidelines.

- It is recognized that the following concerns raised by the Board in September, 2013, have since been satisfactorily addressed by GN and/or Stantec:

*Part E, Item 3: The Licensee shall provide to the Board, within ninety (90) days of completion of the construction of all respective design drawings and construction reports, including all as-built drawings, documentation of field decisions that deviate from original plans and any data used to support these decisions. These plans and drawings shall be stamped by and engineer.*

*The status of the Landfarm that the construction/operation was approved under the Licence is unknown as no 2012 Annual Report was submitted.*

*Part H, Item 2: The Licensee shall, within six (6) months of the issuance of the Licence, submit to the Board for review, an Addendum to the Spill Contingency Plan;*

### Outstanding issues:

Although most of the Board's concerns were addressed by GN, clarification is requested on the following issues presented in the 2013 Annual Report:

1. Pursuant to Part J, Item 3 of the Licence, the licensee is required to sample the landfarm at least twice per annum, once immediately following the spring thaw and then again just before the ground freezes in the fall. Even in the licensee's own O&M plan (Submitted 2012/05/01) it is indicated:

"Field testing will be completed on samples taken once a month, during the snow free season, immediately after the contaminated soil is turned. This will be a good indicator of the progress of the remediation."

In the 2013 Annual Report, however, it appears that soil sampling occurred once (June 28/29). The licensee is requested to elaborate on why additional sampling did not occur.

2. The Annual Report states that no effluent was discharged from the landfarm and therefore no water quality analysis was

Kind regards,



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