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File No.: **1BR-SAR1727**

1BR-LOR1727 1BR-CLI1727 1BR-ROS1727 1BR-SIM1520 1BR-EKA1734 1BR-ROB1536

June 26, 2018

Charlotte Lamontagne
Director, Contaminated Sites
Indigenous and Northern Affairs Canada
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Jean Allen Contaminants Specialist Indigenous and Northern Affairs Canada 969 Qimugjuk Building, 2nd Floor Iqaluit, NU XOA 0H0

Email: canada.ca Email: jean.allen@canada.ca

RE: NWB Technical Review of Annual Reports for Water Licences for Post-Remediation Long Term Monitoring Programs in Nunavut including Additional Reports and Submissions Since Licence Renewal.

Dear Ms. Lamontagne and Ms. Allen:

The Nunavut Water Board (NWB) has completed a technical review of 2017 Annual Reports for Water Licences for Post-Remediation Long Term Monitoring Programs in Nunavut along with additional submission(s) related to the Licences since their renewal. Overall, the review looked at the following documents:

- Water Licence No. 1BR-SAR1727:
 - o 2017 Annual Report
 - o Long Term Monitoring Report 2017
- Water Licence No. 1BR-LOR1727:
 - o 2017 Annual Report
 - o Long Term Monitoring Report 2017
 - Abandonment and Restoration Plan 2017
- Water Licence No. 1BR-CLI1727:

- o 2017 Annual Report
- o Long Term Monitoring Report 2017
- Abandonment and Restoration Plan 2017
- Water Licence No. 1BR-ROS1727:
 - o 2017 Annual Report
 - o Long Term Monitoring Report 2017
- Water Licence No. 1BR-SIM1520:
 - o 2015, 2016 and 2017 Annual Reports
 - Long Term Monitoring Report 2016
- Water Licence No. 1BR-EKA1734
 - o 2017 Annual Report; and
- Water Licence No. 1BR-ROB1536:
 - o 2015, 2016 and 2017 Annual Report
 - o Long Term Monitoring Report 2016
 - o Long Term Monitoring Plan 2017

On March 29, 2018, the NWB received 2017 Annual Reports from Indigenous and Northern Affairs Canada (INAC) for Water Licences 1BR-SAR1727, 1BR-LOR1727, 1BR-CLI1727, 1BR-ROS1727, 1BR-SIM1520, 1BR-ELR1419, 1BR-EKA1734, and 1BR-ROB1536. This technical review process excluded 1BR-ELR1419 as it is going through a renewal process that includes a review of all relevant reports and submissions.

This review included all Annual Reports submitted since the most recent Licence Renewal for all of the Licences under consideration. Annual Reports submitted prior to the renewal process were reviewed as part of that process and did not need to be included in this review.

Overall, the NWB is impressed with the quality of the annual reports and other submissions and determined that they addressed the requirements of the Licences and could be deemed acceptable. Table 1 provides a summary of the review.

However, the NWB notes that the Licensee has not provided all the submissions previously required by the Licences:

• 1BR-SAR1727, Part I, Item 1 states:

The Licensee shall submit an **updated Spill Contingency Plan** to the Board for approval within thirty (30) days from the date of issuance of the Licence.

To date, the NWB has no record of receiving this information which was due on September 1, 2017.

• 1BR-ROS1727, Part I, Item 1 states:

The Licensee shall submit an **updated Spill Contingency Plan** to the Board for approval within sixty (60) days from the date of issuance of the Licence.

To date, the NWB has no record of receiving this information which was due on November 10, 2017.

• 1BR-ROS1727, Part K, Item 4 states:

The Licensee shall submit to the Board, for review and acceptance, a **Quality Assurance** (QA) / **Quality Control** (QC) **Plan** within sixty (60) days following issuance of the Licence. The Plan shall include a letter from an analyst conforming that the plan is acceptable for achieving the monitoring proposed.

To date, the NWB has no record of receiving this information which was due on November 10, 2017.

• 1BR-SIM1520, Part H, Item 1 states:

Licensee shall submit an **updated Spill Contingency Plan** to address comments provided by AANDC-WRD during the review of this application. Revisions to the Plan ("Spill Contingency Plan CAM-D Dew Line Environmental Remediation Simpson Lake, Nunavut" for the above mentioned project which was submitted on September 9, 2010) are to be submitted in the form of an addendum to the Board, to be submitted to the Board by March 31, 2016.

To date, the NWB has no record of receiving this information which was due on March 31, 2016.

Table 1 provides a summary of the Annual Reports and additional management reports, including the outstanding reports submitted under the above stated Licences.

Should you have any questions, please feel free to contact me, Dave Baines, at (867) 360-6338 (extension 29), at your earliest convenience.

Dave Baines
Nunavut Water Board,
Technical Advisor

Cc: Distribution List – Qikiqtani/ Kitikmeot/ Kivalliq

Table 1 Summary of Licence Annual Reports and Management Plans Reviewed or Missing

Licence No.	2015 Annual Report	2016 Annual Report	2017 Annual Report	Additional Reports		Additional Plans		Missing Plans
				Title	Status	Title	Status	
1BR-SAR1727	P/R	P/R	Reviewed in 2018. Deemed Acceptable	Long Term Monitoring 2017	Reviewed in 2018. Deemed Acceptable			Updated Spill Contingency Plan
1BR-LOR1727	P/R	P/R	Reviewed in 2018. Deemed Acceptable	Long Term Monitoring 2017	Reviewed in 2018. Deemed Acceptable	Cape Christian Abandonment and Restoration Plan	Reviewed in 2018. Deemed Acceptable	None
1BR-CLI1727	P/R	P/R	Reviewed in 2018. Deemed Acceptable	Long Term Monitoring 2017	Reviewed in 2018. Deemed Acceptable	PIN-B Clifton Point Abandonment and Restoration Plan	Reviewed in 2018. Deemed Acceptable	None
1BR-ROS1727	P/R	P/R	Reviewed in 2018. Deemed Acceptable	Long Term Monitoring 2017	Reviewed in 2018. Deemed Acceptable			Updated Spill Contingency Plan Quality Assurance (QA) / Quality Control (QC) Plan
1BR-SIM1520	Reviewed in 2018. Deemed Acceptable	Reviewed in 2018. Deemed Acceptable	Reviewed in 2018. Deemed Acceptable	Long Term Monitoring 2016	Reviewed in 2018. Deemed Acceptable			Updated Spill Contingency Plan
1BR-EKA1734	P/R	P/R	Reviewed in 2018. Deemed Acceptable					None
1BR-ROB1536	Reviewed in 2018. Deemed Acceptable	Reviewed in 2018. Deemed Acceptable	Reviewed in 2018. Deemed Acceptable	Long Term Monitoring 2016 P/R = Previously Reviewe	Reviewed in 2018. Deemed Acceptable	Roberts Bay Long Term Monitoring Plan	Reviewed in 2018. Deemed Acceptable	None