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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

File Nos.: **1BR– KIV1621**
1BR–MTH1722
1BR–EKA1734
1BR- ELR1829
1BR–LOR1727
1BR– RES1626
1BR– SIM1520

September 24, 2019

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**RE: NWB Technical Review of Annual Reports and Associated Submissions for Remediation and Post-Remediation Programs under Water Licences Nos.:
1BR-KIV1621, FOX-D, Kivitoo Site Remediation Project;
1BR-MTH1722, CAM-C, Matheson Point Site Remediation Project;
1BR-EKA1734, FOX-C, Ekalugad Fjord Long Term Monitoring Project;
1BR-ELR1829, Ennadai Lake Long Term Monitoring Project;
1BR-LOR1727, Cape Christian Long Term Monitoring Project;
1BR-RES1626, BAF-5, Resolution Island Long Term Monitoring Project; and
1BR-SIM1520, CAM-D, Simpson Lake Long Term Monitoring Project**

Dear Ms. Lamontagne, Ms. Kydd, Ms. Theoret-Gosselin, and Mr. Morakinyo:

The Nunavut Water Board (NWB or Board) has completed a technical review of the Annual Reports and associated submissions for the Remediation Programs under Water Licences Nos. 1BR-KIV1621 and 1BR-MTH1722, and Post-Remediation Long Term Monitoring Programs under Water Licences Nos. 1BR-EKA1734, 1BR-ELR1829, 1BR-LOR1727, 1BR-RES1626,

and 1BR-SIM1520 provided to the Board in 2019. Overall, the following documents were considered during the technical review:

- Water Licence No. 1BR-KIV1621:
 - 2018 Annual Report
 - Spill Contingency Plan Addendum, dated March 2019
 - Remedial Action Plan Addendum, dated March 2019
- Water Licence No. 1BR-MTH1722:
 - 2017 and 2018 Annual Reports
 - Wastewater Treatment O&M Plan, dated September 2017
 - Soil Treatment Plan, dated September 2017
 - Erosion Sediment and Drainage Control Plan, dated September 2017
 - Spill Contingency Plan, dated April 2017
 - Quality Assurance/Quality Control Plan, dated February 2018
 - Sampling Methodology, Laboratory Location, Personnel and Protocols, dated June 2017
 - Reclamation Plan, dated May 2018
- Water Licence No. 1BR-EKA1734:
 - 2018 Annual Report
 - 2018 Long Term Monitoring Report
- Water Licence No. 1BR-ELR1829:
 - 2018 Annual Report
 - 2018 Long Term Monitoring Report
- Water Licence No. 1BR-LOR1727:
 - 2018 Annual Report
 - 2018 Long Term Monitoring Report
- Water Licence No. 1BR-RES1626:
 - 2018 Annual Report
- Water Licence No. 1BR-SIM1520:
 - 2018 Annual Report
 - 2018 Long Term Monitoring Report
 - Spill Contingency Plan, dated November 2018

Upon receipt, all above-mentioned submissions were distributed for public review. No comments have been received to date with the exception of the recommendations provided by Crown-Indigenous Relations and Northern Affairs (CIRNA) for the Wastewater Treatment O&M Plan and Updated Spill Contingency Plan submitted under Water Licence 1BR-MTH1722.

The technical review of the Annual Reports, along with the associated submissions, determined that the information provided generally addresses the requirements of respective Water Licences and could be deemed acceptable.

However, the NWB notes that the following deficiencies should be addressed in order to ensure compliance with the respective Water Licences:

- **1BR-KIV1621**

Part F, Item 1 states:

*The Licensee shall submit to the Board for approval in writing, at least forty-five (45) days prior to commencing operation of the **Sewage Disposal Facility and the Landfarm Facility, an operations and maintenance manual** that includes procedures for operating both facilities, as well as monitoring requirements and other relevant information.*

The Board's understanding is that the Sewage Disposal Facility and Landfarm have been constructed and are now in operation. However, the Board has no record of receiving the information required under Part F, Item 1 of Water Licence 1BR-KIV1621 to date.

- **1BR-MTH1722**

The Board understands that no post-remediation long term monitoring is planned for this site due to the walk-away nature of current cleanup activities. The Board also notes that the demobilization to the south has failed in 2018 and was rescheduled to August 2019. The Board would like to remind the Licensee that the July 2018 recommendations provided by CIRNA for the Wastewater Treatment O&M Plan and Updated Spill Contingency Plan should be addressed if the Licensee plan to continue any activities on site past the 2019 season.

- **1BR-ELR1829**

Part I, Item 1 states:

*The Licensee shall provide to the Board for review, and with the 2018 annual report, an **addendum** to the plan entitled "**Remedial Action Plan** Former Weather Station Ennadai Lake, Nunavut" dated November 2012*

Part J, Item 8 states:

*The Licensee shall submit to the Board for review, with the next annual report, or thirty (30) days prior to the release of any effluent, a **Quality Assurance/Quality Control Plan**. [...] The Plan shall be acceptable to an accredited laboratory and include a covering letter from the accredited laboratory confirming acceptance of the Plan for analyses to be performed under the Licence.*

To date, the NWB has no record of receiving this information, which was due on March 31, 2019. The Board would like to remind the Licensee that Part J, Item 8 was carried over from the previous Water Licence No. 1BR-ELR1419, because this condition was never fulfilled.

- **1BR-RES1626**

Part B, Item 8 states:

The Licensee shall review the Plans referred to in this Licence, as required by changes in operation and/or technology, and modify the Plan accordingly. Revisions to the Plans shall be submitted in the form of an Addendum to be included with the Annual Report.

The Board notes that active monitoring is no longer required for some of the waste management facilities that were captured in previous Licences issued to this Project and requests the Licensee to reflect these changes within the next update to the **Monitoring Program**.

- **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 [...] are to be submitted in the form of an addendum to the Board [...] by March 31, 2016.*

The NWB notes that a general Spill Contingency Plan was submitted for all remediated sites currently in the Long Term Monitoring Program in November 2018. However, this plan does not address the recommendations provided by CIRNA (or formerly known as AANDC) during the Licence renewal process. The Board would like to remind the Licensee that CIRNA requested to “provide an updated Spill Contingency Plan that reflects the project’s current status [...] specific to site remediation activities that were completed in 2010.”

Should you have any questions, please feel free to contact the undersigned at (867) 360-6338 (extension 29) or sergey.kuflevskiy@nwb-oen.ca, at your earliest convenience.

Sincerely,



Sergey Kuflevskiy
Nunavut Water Board,
Technical Advisor

Cc: Distribution List – Qikiqtani/ Kitikmeot/ Kivalliq