



NWB Tools

Robin Ikkutisluk <robin.ikkutisluk@nwb-oen.ca>

Re: 160915 1BR-FOX1118 Annual Reports-OVKE

1 message

Valerie Kogvek <valerie.kogvek@nwb-oen.ca>

Fri, Sep 16, 2016 at 9:43 AM

To: "Van Dyck, Tamara" <Tamara.VanDyck@dcc-cdc.gc.ca>

Cc: Licensing Department <licensing@nwb-oen.ca>, Sean Joseph <sean.joseph@nwb-oen.ca>,

"CYNTHIA.TREMBLAY2@forces.gc.ca" <CYNTHIA.TREMBLAY2@forces.gc.ca>, "DEBBIE.NICHOLLS@forces.gc.ca"

<DEBBIE.NICHOLLS@forces.gc.ca>

Good Morning Tamara, thank you very much for directing me to the files you have submitted in August.

Best Regards

Valerie Kogvek

Licensing Administrator



Valerie Kogvek- ᐱᐱᐱᐱ ᐱᐱᐱᐱ

Licence Administrator Assistant- Administratrice des permis

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NUNAVUT WATER BOARD - OFFICE DES EAUX DU NUNAVUT

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On Fri, Sep 16, 2016 at 4:58 AM, Van Dyck, Tamara <Tamara.VanDyck@dcc-cdc.gc.ca> wrote:

Hi Valerie,

The Annual Reports that you are looking for are already posted on the NWB registry, further down in this email are your links. As previously discussed and agreed upon with the board, a cover letter was issued indicating which sites were visited for monitoring events each year. For those sites where no monitoring event occurred no report was issued, this is indicated in the cover letter; and for those sites where a monitoring event occurred in that particular year a complete monitoring report was attached.

<http://www.nwb-oen.ca/public/registry/1%20INDUSTRIAL/1B/1BR%20-%20Remediation/1BR-CAP0914%20PIN%202/3%20TECH/9%20MONITORING/>

The link above has correspondence from the NWB acknowledging the receipt of the reports and cover letter as fulfilling the requirement for Part D of the Licence.

- 1BR-CAP0914 - 2013

<http://www.nwb-oen.ca/public/registry/1%20INDUSTRIAL/1B/1BR%20-%20Remediation/1BR-CAP0914%20PIN%202/3%20TECH/9%20MONITORING/DLFMON%20PIN-2%202013%20FINAL/Final%20report/13-MONIT-rf-1.pdf>

- 1BR-CAP0914 – 2014

<http://www.nwb-oen.ca/public/registry/1%20INDUSTRIAL/1B/1BR%20-%20Remediation/1BR-CAP0914%20PIN%202/3%20TECH/9%20MONITORING/160215%201BR-CAP0914%202014%20Monitoring-ILAE/PIN-2%20LFM%20Report%202014.pdf>

- 1BR-CAP0914 – 2015

<http://www.nwb-oen.ca/public/registry/1%20INDUSTRIAL/1B/1BR%20-%20Remediation/1BR-CAP0914%20PIN%202/3%20TECH/9%20MONITORING/160816%201BR-CAP0914%20DLCU%202015%20PIN%202%20LTM-IAAE.pdf>

- 1BR-FOX1118 - 2014

[http://www.nwb-oen.ca/public/registry/1%20INDUSTRIAL/1B/1BR%20-%20Remediation/1BR-FOX1118%20FOX%204/3%20TECH/9%20MONITORING%20\(J\)/160215%201BR-FOX1118%20FOX-4%20LFM%20Report%202014-ILAE.pdf](http://www.nwb-oen.ca/public/registry/1%20INDUSTRIAL/1B/1BR%20-%20Remediation/1BR-FOX1118%20FOX%204/3%20TECH/9%20MONITORING%20(J)/160215%201BR-FOX1118%20FOX-4%20LFM%20Report%202014-ILAE.pdf)

- 1BR-FOX1118 - 2015

There was no Monitoring Event at this site in 2015 consequently no Monitoring Report for this site was included in the submitted package; the submission cover letter indicates the sites that were not visited in the given field season. As a result, for those sites not visited no Monitoring Report is included and as such the information provided in the cover letter table act as the Annual Report for that site. The attached email is a record of the most recent details of this agreement in regards to the DEW Line Clean Up Project Annual Reporting to the NWB.

<http://www.nwb-oen.ca/public/registry/1%20INDUSTRIAL/1B/1BR%20-%20Remediation/1BR-CAP0914%20PIN%202/3%20TECH/9%20MONITORING/160816%201BR-CAP0914%20Long%20Term%20Monitoring%20Reports%20for%20Dew%20Line%20Sites-IAAE.pdf>

Regards,

Tamara

From: Valerie Kogvek [mailto:valerie.kogvek@nwb-oen.ca]

Sent: Thursday, September 15, 2016 6:44 PM

To: Van Dyck, Tamara

Cc: Licensing Department; Sean Joseph

Subject: 160915 1BR-FOX1118 Annual Reports-OVKE

Good Afternoon Tamara, please submit the following information to the Nunavut Water Board we can not locate the following information for your files

- 1BR-CAP0914 - 2013, 2014, and 2015 Annual Reports
- 1BR-FOX1118 - 2014 and 2015 Annual Reports
- 1BR-CAP0914 - 2013, 2014, and 2015 Annual Reports
- 1BR-FOX1118 - 2014 and 2015 Annual Reports

The Licensee has provided the following information suggesting that the reports have been submitted:

1. 1BR-CAP0914

- a) 2013 Annual Report – submitted in the package dated 18 March 2013
- b) 2014 Annual Report – submitted in the package dated 6 May 2015
- c) 2015 Annual Report – submitted in the package dated 16 Aug 2016

2. 1BR-FOX1118

- a) 2014 Annual Report – submitted in the package dated 6 May 2015
- b) 2015 Annual Report – submitted in the package dated 16 Aug 2016 (note: as agreed upon by the Board, there was no Monitoring Event at this site in 2015 consequently no Monitoring Report for this site was included in the submitted package)

Regards

Valerie Kogvek

Licensing Administrator

vk/sj



Valerie Kogvek- ᠊ᠠᠨ ᠤᠯᠤᠰ

Licence Administrator Assistant- Administratrice des permis
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----- Forwarded message -----

From: Brady MacCarl <brady.maccarl@nwb-oen.ca>

To: "Laura D'Costa@forces.gc.ca" <Laura.D'Costa@forces.gc.ca>

Cc: David Hohnstein <david.hohnstein@nwb-oen.ca>, Andrew Keim <Andrew.Keim@aandc-aadnc.gc.ca>, "Van Dyck, Tamara" <Tamara.VanDyck@dcc-cdc.gc.ca>, Phyllis Beaulieu <phyllis.beaulieu@nwb-oen.ca>

Date: Thu, 12 Feb 2015 20:42:03 +0000

Subject: Re: Clarification of DEW Line Monitoring Licensing Requirements - Application for Approval of Use of Waters on Deposit of Waste Without a License
Thanks for this Laura.

If I could just add an administrative request on the NWB's end in order to ensure that this information is processed orderly and efficiently in the future:

1. In Case (a), regarding a letter of notice to substitute for an annual report for sites where no monitoring activities occurred, I request that the letter specifically state that it is fulfilling the obligations (Under Section 14.1 of the *Regulations*) for an Annual Report on the listed files. This clarification will ensure that the information is processed expeditiously.

2. Similarly, in Case (b), where a monitoring event has occurred at one of the sites in a given year, I request that the cover letter/introduction of the report indicate that the report fulfills the obligations (Under Section 14.1 of the *Regulations*) for an Annual Report.

I appreciate your time and cooperation Laura and Tamara.

Kind regards,



On Thu, Feb 12, 2015 at 12:39 PM, <Laura.D'Costa@forces.gc.ca> wrote:

Hello Everyone,

Thank you for your time and participation in our call.

In follow up to yesterday's call, I wanted to outline my understanding of everyone's agreement:

1. Since the DEW Line remediation started as a Type B License, the long term monitoring remains under a Type B License unless AANDC confirms otherwise. *Please note: As an aside (as per the 2nd paragraph below in David Hohnstein's February 11, 2015 email), DND/DCC will follow up with AANDC to ascertain if an inspection and closure to reduce the license requirements may be an option as we move forward. In the interim, DND/DCC will continue to maintain our Type B licenses.*

2. Regarding compliance with the Type B license reporting requirements, for DEW Line (all 15 Nunavut sites), there are two acceptable cases (a or b) as outlined next. These two cases have been the standard practice for reporting under the Type B Licenses on the DEW Line Monitoring, and can continue. The rationale, is that the information of interest in the licensing, pertains to the effectiveness of the remedial solution.

a. Case 1: When there has been no monitoring event in a given year at a site, an annual letter can be submitted outlining that no-one went to site that year. This letter will confirm that no water has been collected, and no monitoring report will be provided. *Please note: After our call, Andrew Keim confirmed with Tamara (DCC) that one letter addressing all 15 sites can be provided, and 15 individual letters are not required.*

b. Case 2: Where there has been a monitoring event in a given year at a site, the reporting requirement constitutes the provision of a copy of the final monitoring report from that year. The monitoring report details the water and soil quality from the samples collected at the site, as well as any results from the landfill inspection. Confirmation that a minimal amount of water (<1m3/day) would have been collected on site for monitoring purposes should be outlined. Water use has been defined as any water use (no matter how small the volume), and water collection for monitoring purposes has not been excluded.

Should there be any questions, concerns or corrections related to this understanding please advise me by replying to this email by Thursday February 19, 2015, or please advise me that more time is required. If no email response is received by the end of day on Thursday February 19, 2015, this correspondence will be considered a complete and accurate record of the licensing and reporting requirements for the DEW Line long term monitoring events in Nunavut.

Sincerely, Laura

Laura D'Costa, P.Eng., M.Sc., Distant Early Warning Line Project Manager
Directorate of Contaminated and Legacy Sites Project Delivery | Direction Realisation de projets
Department of National Defence | Défense nationale
101 Colonel By Drive, Ottawa ON K1A 0K2 | 101, promenade Colonel By, Ottawa ON K1A 0K2 (180 Kent Street Minto Building, 180 rue Kent, édifice Minto)
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Government of Canada | Gouvernement du Canada

From: David Hohnstein [mailto:david.hohnstein@nwb-oen.ca]
Sent: February-11-15 10:38 AM

To: Brady MacCarl

Cc: D'Costa LN@ADM(IE) DCLSPD@Ottawa-Hull; Andrew Keim; Tamara.VanDyck@dcc-cdc.gc.ca

Subject: Re: Clarification of DEW Line Monitoring Licensing Requirements - Application for Approval of Use of Waters or Deposit of Waste Without a License

Good morning everyone,

for an initial background to the NWB's licensing, i've attached a letter that was prepared for the Polaris mine Type A Licensee some time ago with respect to a request to scale the licence from a type A to a type B, which in principle is similar to going from a type b, to what now is available with the new regulations in the form of an approval without a licence. Essentially, the legal perspective is, the NWB issues licences for the undertaking (throughout its lifecycle), and not for the current activities at the site. see initial paragraphs.

The only mechanism that might be available to reduce the licensing requirement (ie from a type b to an approval WL) would be if AANDC were to issue the necessary correspondence indicating that an inspection has taken place and all activities are completed, the site has been remediated to the satisfaction of the inspector, and the file can be closed. As this likely has not taken place, a type b licence would still be a requirement.

As for other areas of requirements under a licence, reporting requirements are set out in sec 14(1) of the regulations with respect to annual reporting of licensees.

We look forward to discussing these and other items you have included in your request during our teleconference call at 9am.

Regards,

David Hohnstein

On Tue, Feb 10, 2015 at 8:42 AM, Brady MacCarl <brady.maccarl@nwb-oen.ca> wrote:

Great. Thanks.

On Tue, Feb 10, 2015 at 8:07 AM, <Laura.D'Costa@forces.gc.ca> wrote:

Hi Everyone,

Please find a tentative meeting invitation subject to availability.

Conference ID - 5704079

Local Dial-in number - **613-960-7513**

Toll-free Dial-in number -

1 877-413-4788

From: Brady MacCarl [mailto:brady.maccarl@nwb-oen.ca]

Sent: February-09-15 2:51 PM

To: Andrew Keim

Cc: D'Costa LN@ADM(IE) DCLSPD@Ottawa-Hull; Tamara.VanDyck@dcc-cdc.gc.ca<mailto:Tamara.VanDyck@dcc-cdc.gc.ca>; David Hohnstein
Subject: Re: Clarification of DEW Line Monitoring Licensing Requirements - Application for Approval of Use of Waters or Deposit of Waste Without a License

Hi everyone,

There are a few things we would like to discuss with our legal team before having this meeting.

Andrew, Laura and Tamara, will Wednesday afternoon work?

On Feb 6, 2015 8:36 AM, <Laura.DCosta@forces.gc.ca<mailto:Laura.DCosta@forces.gc.ca>> wrote:
Hello Mr. Hohnstein, Mr. MacCarl and Mr. Keim,

I am writing to follow up with you to set up a teleconference call, to discuss recent correspondence regarding the long term monitoring events scheduled for the Distant Early Warning Line in Nunavut.

In review of the correspondence in the past week or so, I took a look at the Nunavut Waters Regulations (SOR/2013-69, current to December 22, 2014) to understand our requirements. What I noted in my review is the following:

1) Under Schedule 2, column 2 we fall into the category of "Any other use of waters", under column 3 "Use of less than 50 m3 per day"; According to the Regulations, this categorizes our DEW Line monitoring events as "Water Use Authorized Without License". The scope of work on site involving water is the collection of water samples, these events would result in less than 1 m3 of water being taken over the duration of the monitoring event. A small amount of water is placed in water bottles (very small amount on the order of 10's of litres at most) for analysis at an off-site laboratory and the rest is returned to the ground and the active layer/groundwater table (i.e. back to where it came from without any change, literally pumped to the ground surface, where it infiltrates back into the ground).
2) During these monitoring events contractors will sometimes set up short term camps (up to 4-5 days) for approximately 5 people. They bring in their own potable water during this time, and would dispose of any human sewage through burial on site. All other generated waste is taken off site for proper disposal.

I would like to clarify the following in our call:

- i) what are our licensing requirements are for these monitoring events;
- ii) the scope of our monitoring events; and
- iii) the best path forward from a regulatory perspective for our activities in 2015 and future years. For this year and future years, I would like to "apply for approval of use of waters or deposit of waste without a license".

Please advise of your availability next week (February 9-13) to discuss, and I will set up a call.

Thank you so much for your consideration, Sincerely, Laura

Laura D'Costa, P.Eng., M.Sc., Distant Early Warning Line Project Manager
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