



NWB Tools

Robin Ikkutisluk &lt;robin.ikkutisluk@nwb-oen.ca&gt;

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**[Licensing] Licence No. 1BR-GLA0815 -- Additional Information Regarding Licence Renewal Application**

1 message

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

Fri, Jan 23, 2015 at 4:58 PM

To: tamara.vandyck@dcc-cdc.gc.ca

Cc: Licensing Department &lt;licensing@nwb-oen.ca&gt;

Dear Tamara Van Dyck:

Thank you for the Licence Renewal Application for Licence 1BR-GLA0815, submitted to the NWB on January 19, 2015.

On preliminary analysis the Application appears to generally meet licence requirements. However, I am requesting that DCC provide additional information on the following issues before the application process continues:

1. Regarding frequency of monitoring events, it is understood DDC followed a multi-phase sampling schedule which, although not directly referenced, appears to follow the *Abandoned Military Site Remediation Protocol* (INAC, 2008) schedule where long-term monitoring events occur in years 1, 3, 5, 7, 10, 15, and 25. However, the Landfill Monitoring Program (2008) submitted with the Application states "The East Landfill and the Tier II Disposal Facility will be monitored on an annual basis for the first five years." The first five years in the document are identified as 2006-2010. Please clarify the DCC's monitoring strategy.
2. Pursuant to Part D, Item 1 of the Licence, the Licensee was to a Close-out Report for the sewage lagoon built during remediation activities (2005). NWB reminded the Licensee of this condition in an email dated October 13, 2010. The Close-out Report was never submitted.
3. Part K, Item 2 of the Licence required the Licensee to provide an addendum to the Monitoring Plan (2008) detailing the monitoring completed for the Landfarm Facility, including the criteria employed for contaminated soil and the location of remediated soil. The NWB reminded the Licensee of this requirement in an email dated September 23, 2010, but did not receive the addendum.
4. The Licensee failed over the course of the Licence to submit any Annual Reports, as required under Part B, Item 1 of the Licence. Although the NWB recognizes that in many respects it appears redundant to submit Annual reports in years that a) no monitoring activity occurs, or b) a Long-term Monitoring Report for the year has already been submitted, the Proponent is kindly reminded that Annual Reports are one of the few ways the NWB receives updates—to respond to if needed—on many of the licences under its jurisdiction. Long-term Monitoring Reports do not always cover many of the conditions imposed under the Licence which the NWB finds important, such as water use and waste generated during camp activities. The Annual Report also allows the Licensee to respond on a personal note to monitoring work undertaken by a third party, such as corrective measures to highlighted deficiencies. Lastly, the NWB requires the submission of Annual Reports from all Licensees involved in remediation work of former DEW Sites, and we cannot pick-or-choose with whom we reinforce this condition. Please provide Annual Reports as defined under Part B of the Licence for the years monitoring activities occurred.

Please contact me with any questions or concerns you may have.

Regards,



Brady MacCarl, MSc-  $\geq \Delta \cap \mathbb{L}^b b^c$

Technical Advisor- Conseiller Technique

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