

File: 1BR-IAG1924

June 14, 2021

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Regional Environmental Advisor,
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Region
Transport Canada
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Email: reid.campbell@tc.gc.ca

RE: Licence No: 1BR-IAG1924 Type "B"; Monitoring Well Installation and Groundwater Sampling at Iqaluit Airport Project, Transport Canada; 2019 and 2020 Annual Reports Review

Dear Reid Campbell:

The Nunavut Water Board (NWB or Board) has completed the technical review of the 2019 and 2020 Annual Reports (2019 Report and 2020 Report, respectively) (Reports) for Type "B" Water Licence 1BR-IAG1924 (Licence). The 2019 Report was received on March 31, 2020, and the 2020 Report was received on March 30, 2021 from Transport Canada (TC or Licensee) and submitted as a requirement under Part B of the Licence.

Copies of all documents received during Reports review can be accessed through the NWB's Public Registry and FTP site using the following link:

ftp://ftp.nwb-oen.ca/registry/1%20INDUSTRIAL/1B/1BR%20-%20Remediation/1BR-IAG1924%20Transport%20Canada/3%20TECH/B%20GENERAL/2%20ANNUAL%20RPT/

The NWB distributed the Reports to the Qikiqtani distribution list for information on September 29, 2020 and April 6, 2021, respectively. No comments have been received to date. The Board considers that the monitoring information provided in the Reports satisfies the requirements of the Licence.

In the 2019 Report, the Licensee stated:

Due to the presence of PFAS in groundwater samples collected from the newly installed monitoring wells and exceedance of three (3) PFAS compounds in MW19-03 (located at the immediate vicinity of the downgradient boundary), it is recommended that additional investigation takes place at the Site. PFAS detection and exceedances in groundwater could be an indicator of potential residual sources that may lead to potential migration of the resultant PFAS plume off-site. The collection of soil and groundwater samples at the vicinity of the former FTA would be required to confirm any remaining source in that area.

Additional site investigations or sampling programs would also be required to evaluate the risk associated with each potential exposure pathways. Additional sampling and analysis would also be required to establish the nature and extent of PFAS for each applicable media (e.g., soil, sediment, surface water, and groundwater), and determine if there is a complete receptor pathway. Additional sampling and analysis would also be required to come up with the best remedial options to prevent further off-site migration of PFAS.

In its 2020 Report, TC indicated that the groundwater monitoring wells were decommissioned in accordance with the Board-approved *Abandonment and Restoration Plan – Iqaluit Airport Monitoring Wells, Nunavut* dated September 2020. The Licensee included a statement requesting cancellation of the Licence.

The Board would like to remind the Licensee of the requirement to submit a Quality Assurance/Quality Control Plan (QA/QC Plan) that conforms to the guidance document "Quality Assurance (QA) and Quality Control (QC) Guidelines For Use by Class "B" Licensees in Collecting Representative Water Samples in the Field and for Submission of a QAQC Plan" INAC (1996). The QA/QC Plan shall include a covering letter from the accredited laboratory confirming acceptance of the QA/QC Plan for analyses to be performed under the Licence.

In addition to the outstanding QA/QC Plan, the Board requests that the Licensee submit a summary of activities that TC is considering in light of the findings of the monitoring activities and the Monitoring Well Installation and Groundwater Sampling at Iqaluit Airport Project before applying for cancellation of the Licence.

If you have any questions, please contact the undersigned at assol.kubeisinova@nwb-oen.ca or (867) 360 6338 (ext. 31).

Best regards,

Assol Kubeisinova Nunavut Water Board Technical Advisor

Cc: Distribution List – Qikiqtani