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Department of Economic Development & Transportation
Pivalliayuliqiyikkut Ingilrayuliqiyitkullu
Ministère du Développement économique et des Transports

November 7, 2014

Mr. David Hohnstein, Director of Technical Services Nunavut Water Board P.O. Box 119 Gjoa Haven, NU XOB 1J0

Dear Mr. Hohnstein,

In response to questions in from the September 16, 2014 correspondence from Mr. Damien Côté related to the chromium soils issue and our subsequent discussion on the matter via telephone conference on October 1, 2014 with Mr. Côté, Ms. Meadows and Mr. MacCarl, we are enclosing an updated and consolidated report prepared by our technical advisors WSP Canada Inc. (WSP) to describe more fully the current site conditions and nature and origin of the material, the challenge to our Iqaluit Airport Project, and proposed solutions.

The report confirms that Chromium has been detected in various levels across most areas of the airport, that no hexavalent chromium (Cr VI) is present on site, that total chromium levels are consistent with background levels found elsewhere in uninhabited areas of South Baffin Island, and the soil will have no negative impact on the local environment or health and safety. Based on its analysis, WSP has recommended that soil found to contain chromium within the airport site be managed as clean native soil and not as waste or contamination as defined under the applicable regulations in Nunavut.

We note that WSP identified that Total Chromium on site has been detected above the CCME Guideline criteria and outlines the approach to developing site specific conditions by the Ontario Ministry of Environment (MOE), which Province faces a very similar situation with the predominance of Canadian Shield geology much like the background found in Nunavut.

In conclusion, the Iqaluit International Airport Improvement Project involves moving substantial amounts of earth within the airport bounds. It is reasonable to believe that much of this earth contains some level of chromium. We respectfully submit that the attached report from WSP be considered by the Board in any deliberations related to allowing Project impacted soil

containing naturally occurring chromium to be managed as clean native soil without a water license. We seek authorization to reuse the soil on site found to contain chromium as native soil that is generally to be used as backfill in areas that are projected to be covered with a permanent structure.

Your timely and expedited consideration of this matter is much appreciated.

Yours Sincerely,

Per:

Jim Stevens

**Assistant Deputy Minister** 

**Economic Development & Transportation** 

## **Enclosure:**

ENVIRONMENTAL MANAGEMENT OF CHROMIUM IN SOIL, IQALUIT INTERNATIONAL AIRPORT IMPROVEMENT PROJECT, WSP Canada Inc. (November 2014)

## cc:

Brady MacCarl, Technical Advisor, Nunavut Water Board
Pauloosie Suvega, Deputy Minister, Economic Development & Transportation, Government of Nunavut
Roy Green, Deputy Minister, Community and Government Services, Government of Nunavut
John Hawkins, Director Iqaluit Airport, Government of Nunavut
Barry Reimer, IIAIP Chief Project Officer, Government of Nunavut