

Phyllis Beaulieu <phyllis.beaulieu@nwb-oen.ca>

Re: FW: Iqaluit Airport Project - discussion on proposed works

1 message

Andrew Keim < Andrew. Keim@aandc-aadnc.gc.ca>

Wed, Jul 16, 2014 at 1:15 PM

To: karen.kharatyan@nwb-oen.ca, Michael.molinski@tc.gc.ca

Cc: Erik Allain < Erik. Allain@aandc-aadnc.gc.ca>, david.hohnstein@nwb-oen.ca, phyllis.beaulieu@nwb-oen.ca, Dale.Kirkland@tc.gc.ca

I am out of the office and will hopefully be back in iqauit on the 19th. I will review the license and any documentation provided over the weekend and try and have an answer by monday.

Mike are u in Iqaluit?

Andrew

Andrew Keim

Aboriginal Affairs and Northern Development- Government of Canada

1 867 975 4289

1 867 222 6488

>>> Karén Kharatyan 7/16/2014 10:57:29 AM >>> Good Morning Mike,

From my understanding the Tier 3 Risk Based Approach is with respect to the site remediation. I am not sure if using it as fill material may be interpreted as proceeding with this approach to site remediation.

Also the Water Licence Part D, Item 9 states:

The Licensee shall treat Type B Soil in the Landfarm Facility, to the Treatment Objective and, prior to the removal of any treated soil for future use, confirm with the Government of Nunavut, Environmental Protection Service that the soils have been treated to meet the required Treatment Objective, in a manner in accordance with the Operation and Maintenance (O&M) Plan dated January 1, 2009 and Addendum to the O&M Plan dated July 7, 2010, and any subsequent revisions to the Plan approved by the Board in writing.

Part I, Item 9 states:

Areas that have been contaminated by hydrocarbons from normal fuel transfer procedures shall be reclaimed to meet objectives as outlined in the Government of Nunavut's Environmental Guideline for Site Remediation, January 2002. The use of reclaimed soils for the purpose of back fill or general site grading may be carried out only upon consultation and approval by the Government of Nunavut, Department of Environment and an Inspector.

So i am not sure whether GN-DOE approval for back fill could be applied if contaminated soils is not reclaimed according to the Criteria included within the Licence. I would believe it couldn't apply.

At the same time, according to the Licence, Inspector approval is needed along with the GN even for reclaimed soils back-filling.

I hope it helps,



On Wed, Jul 16, 2014 at 7:16 AM, Molinski, Michael Michael.Molinski@tc.gc.ca wrote:

Hi Andrew,

Hope all is well in Iqaluit (other than the dumpcano!) ...

I was interested in getting your opinion on an issue we are having with the Iqaluit Airport re-development plan. Transport Canada has 2 active landfarms (and one that is empty) between the runway and Apron I. The landfarms are in the way of the new apron and taxiway that they are planning to develop. There is approximately 5,000m3 of PHC contaminated soil in the landfarms. TC has a water license to operate these as you know.

This issue is that the airport is proposing to remove the contaminated soil and use it as fill material for the construction of the new apron (please see the attached links below for the work plan). They are using the Tier 3 risk based approach from the NU Guidelines for Contaminated Sites to "remediate sites." In this case they are not remediating the site but placing contaminated soil *in the site*. I have discussed this with the NWB (Phyllis Beaulieu and Karen Kharatyan) and both agreed this does not meet the license requirements. However, Robert Eno (below link via e-mail) has accepted and agreed to the conditions set forth by the consultant for this approach.

It is TC's opinion that this contravenes the CCME PHC Guidelines, Water License issue by NWB and the Nunavut Guidelines for Contaminated Site Remediation. I would like your opinion if this is an acceptable method to proceed. TC will not allow the airport to remove any contaminated soil unless we have approval from NWB and AANDC.

Thanks for your assistance, please contact me if you wish to discuss further.

Phyllis and Karen: Please feel free to add your comments to further this discussion. It would be helpful for TC to have a response from the NWB in writing.

Mike Molinski B.Sc., B.Sc., E.P.

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e: michael.molinski@tc.gc.ca w: http://www.tc.gc.ca/

From: Winmill, Tanya [mailto:TWinmill@GOV.NU.CA]

Sent: Wednesday, July 16, 2014 7:23 AM

To: Kirkland, Dale; Molinski, Michael; 'Karen Kharatyan'; 'Barry Reimer'; Frederickson, Todd; Hawkins, John;

Stevens, Jim

Subject: RE: Iqaluit Airport Project - discussion on proposed works

Hi Dale

Here are some documents that Barry wanted me to pass along prior to our meeting.

Thanks

Tanya

Link to Updated Work Plan:

 $https://dl.dropboxusercontent.com/u/90859893/IIAIP_remediation_work_plan\%20 rev12.pdf$

Link to Phase III ESA:

https://dl.dropboxusercontent.com/u/90859893/IIAIP%20Phase%20III%20ESA%20-%20Final%20Report.pdf

Original Appointment From: Kirkland, Dale [mailto:Dale.Kirkland@tc.gc.ca]
Sent: Tuesday, July 15, 2014 4:09 PM To: Kirkland, Dale; Molinski, Michael; 'Karen Kharatyan'; 'Barry Reimer'; Winmill, Tanya; Frederickson, Todd Subject: Iqaluit Airport Project - discussion on proposed works
When: Thursday, July 17, 2014 10:30 AM-11:30 AM (GMT-07:00) Mountain Time (US & Canada). Where: via conference call
When: Thursday, July 17, 2014 10:30 AM-11:30 AM (UTC-07:00) Mountain Time (US & Canada).
Where: via conference call
Note: The GMT offset above does not reflect daylight saving time adjustments.
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Barry et al,
Barry et al,
Transport Canada would like to have a conference call to discuss the works and activities proposed for the Iqaluit
Airport Project.
Dial In Number: 1-877-413-4790
Conference ID: 9151284
 In particular, we would to discuss: the proposed works and schedule related to the land-farms that TC is operating and the drum cache
 confirmation of the potential excavation of LTU impacted soils for placement in an on-site waste containment cell
or for use within secure areas of the Project works
 any potential implications to the Department's Water License (1BR-LTU 1013)
thanks,
Dale

Dale Kirkland

Regional Manager - Environmental Services

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