From: David Hohnstein
To: "Longobardi, Ciro"
Cc: "Phyllis Beaulieu"
Subject: RE: Licence No 1BR-KRK1112, Kugaaruk Landfarm
Date: Monday, March 26, 2012 4:34:26 PM

Good afternoon Ciro,

Thank you for following up and reminding me of the response needed to Mr. Ediger's email.

I have had an opportunity to give the licence and letter a quick review and can provide the following with respect to the questions raised in the email below:

1) You are correct in the interpretation of Part B, Item 13, in that the requirement for a translated executive summary is only required with the submission of a report or study, prepared for submission to the NWB, in where there would normally be an executive summary provided in English as well. Operational Plans or manuals do not normally contain a summary and are prepared for reference of the licensee and to provide assurance to the Board of procedures being followed.
2) The requirement for sampling/monitoring was included in the licence as a minimum monitoring requirement. If monitoring (sampling) cannot be undertaken during certain times of the year due to logistical/practical reasons, it may be acceptable to simply indicate that within the annual report submission. As written, this would be a non-compliance issue with the licence, however if it is noted, and reasons for the deviation from the condition are presented, there should be no further issue. I would suggest, that if the Licence is to be renewed (or earlier through an amendment), that this and any other item that you may wish to be addressed and amended be brought to the Boards attention at that time and it will be taken into account.
3) No response seen as required at this time;
4) My apology for the misdirection of the letter. The letter should have been provided directly to the Licensee and not the consultant providing the services for the Licensee. In future we will endeavor to address the correspondence accordingly.

If you have any further questions regarding this licence, please feel free to contact me directly. If your inquiry is of an administrative matter, please feel free to contact our Manager of Licensing, Phyllis Beaulieu at licensing@nunavutwaterboard.org .

Regards,

David Hohnstein

From: Longobardi, Ciro [mailto:Ciro.Longobardi@tetratech.com]
Sent: Sunday, March 25, 2012 2:07 PM
To: dts@nunavutwaterboard.org
Subject: RE: Licence No 1BR-KRK1112, Kugaaruk Landfarm

Hello David,

Please provide your comments pertaining to the points below - if you have already replied to David Ediger, I appologize, I have not seen your comments.

David Ediger will no longer be addressing the correspondace regarding the NU Water Board license No. 1BR-KRK1112, which pertains to the impacted soil treatment facility in the Hamlet of Kugaaruk. Going forward, please address your comments and concernes to me. All my contact information is in the signature below.

Once again, I appologize if you have already sent replied to David Ediger's questions below; however, I have yet to see a reply to his email.

Regards,

Ciro Longobardi

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From: Ediger, David
Sent: February 16, 2012 9:50 AM
To: dts@nunavutwaterboard.org
Cc: Rostant, Stuart
Subject: Licence No 1BR-KRK1112, Kugaaruk Landfarm

David: I am in the process of responding to the issues contained in your correspondence, dated December 08, 2011, in reference to the Operations & Maintenance Manual submitted for the Kugaaruk Landfarm Facility. There are several points I would appreciate clarifying with you before we make the required changes.

1. Part B, 13 of the Licence requires the submission of an executive summary in English and Inuktitut for all studies and reports submitted under the Licence. Our interpretation was that the O&M manual was an operational document, not a study nor a report, and therefore, the executive summary was not required. Could you please confirm that our interpretation was not correct and that an executive summary is required for the O&M manual?
2. Part J, 12 requires soil sampling once every four months during active soil treatment. Our experience with the Kugaaruk project has been that the soil being treated is only frost free from June September each year, and it is only during this period that any active soil remediation is occurring. Therefore we scheduled one soil sampling event per year to coincide with the end of the active treatment season. Is it the Board's position that our sampling frequency does not meet the Licence condition?
3. We will consult with our client regarding the site security issue. My understanding was

that they were going to discuss the issue with the Hamlet to determine what steps could be taken to limit site access.

4. As a general observation, the O&M manual was developed primarily to document the activities to be undertaken by the general contractor to ensure that the soil remediation project proceeded in a proper manner and in compliance with the NWB Licence conditions. The intention was not necessarily to address the oversight and compliance role of the consultant, which includes the actions currently being undertaken by TetraTech. We will, however, endeavour to make the required changes to the manual to the satisfaction of the Nunavut water Board.

David Ediger | **Senior Environmental Engineer**
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