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Department of Environment

Ministère de l'Environnement

June 28, 06

Richard Dwyer
Licensing Trainee
Nunavut Water Board

via Email to: licensingtrainee@nwb.nunavut.ca

**RE: NWB1BR-KRK – GOVERNMENT OF NUNAVUT LAND FARM WATER
LICENSE APPLICATION**

Dear Richard:

The Department of Environment (DOE) has reviewed the water license application from the Government of Nunavut – Community & Government Services for contaminated soil remediation in a land farm in Kugaaruk, and has the following comments and recommendations.

1. MONITOROING

- During active treatment process, soil samples should be taken at least once every four months to monitor the remediation performance until the treatment result is below Canadian Soil Quality Guidelines set forth by the Canadian Council of Ministers of the Environment (CCME).
- To ensure groundwater not contaminated by hydrocarbon during the treatment process, water samples from down-gradient monitoring wells should be taken at least twice per year.

2. ABANDONMENT & RESTORATION

Based on the DOE's *Environmental Guideline for Site Remediation*, the DOE has the following recommendations to make:

- Final inspections of the entire site should be conducted by the proponent and lead agency to make sure that all areas of the site have been reclaimed as much as possible to its previous condition. Soil Samples and pictures before and after the project would make this process easy on the proponent and leading agencies involved in determining areas of concern.

It is important the level of residual contamination that will remain on the site be identified.

- The DOE, Environmental Protection Service (EPS) monitors the movement of hazardous wastes including contaminated soil and waste fuel, from generators, carriers to receivers, through a tracking document (Waste Manifest). A Waste Manifest must accompany all movements, and all parties must register with the EPS. There is no mention of this procedure in the project proposal.

We thank NWB for giving us the opportunity to review and provide comments on the Government of Nunavut water license. Please contact us if you have any further questions or comments.

Yours sincerely,

Original signed by

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