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[Licensing] NWB Licence No. 1BR-LOR0813

1 message

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Cc: Licensing Department <licensing@nwb-oen.ca>

Thu, Dec 4, 2014 at 4:16 PM

Hi Allison,

I am currently conducting a preliminary technical review for the Renewal and Amendment Application for Licence No. 1BR-LOR0813 submitted to the NWB on July 23, 2014. The Application generally appears to be in good order, however, before distributing the Application for external review I would appreciate some clarification on the following items:

1. A tabular summary and discussion of results from sampling locations (LOR-1 to LOR-7) are missing from the Annual Reports, pursuant to Part K, Item 1 of the Licence. Although the Remediation Closure Report (2011) provides several hundred pages of lab analysis reports covering samples taken in 2009, and 2010, there is no proper analysis of these results highlighting exceedances and areas for concern. Did this analysis occur?
2. No sampling results are provided for LOR-6 and LOR-7 (Monitoring wells down and up-gradient to the landfarm), and in the Closure Report, the contractor indicates that these locations were not included in their scope of work. However, it is understood that groundwater monitoring wells (MW-1 to MW-4) were installed in the vicinity of the landfarm in 2009. Clarification should be provided on the relationship between the wells mentioned in the Licence (LOR-6 and LOR-7) and the wells installed by the contractor.
3. What is the current status of the landfarm facility? The Closure Report states that contaminated soils have been remediated. Does this mean the landfarm facility has been properly decommissioned?
4. Part K, Item 9 of the Licence states that the Licensee must submit for approval a QA/QC Plan to a certified lab (CALA) 30 days prior to any discharge. This was never submitted. The NWB normally requires a coverletter from an accredited lab indicating their approval of field sampling procedures. However, it is recognized that the 2011 and 2013 Monitoring Reports are both comprehensive and appear to have utilized accredited labs for all soil and water analyses. Therefore, the Licensee is simply reminded to include a QA/QC plan approved by an accredited laboratory in future submissions.

Please contact me with any questions or concerns you may have.

Regards,



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