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[Licensing] Follow up on Renewal Applications for NWB Licences 1BR-CL10914 and 1BR-LOR0813

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To: Lilianne <lilianne.arsenault@aandc-aadnc.gc.ca>
Cc: Licensing Department <licensing@nwb-oen.ca>

Fri, Jan 9, 2015 at 1:07 PM

Hi Lilianne,

Andrea Morgan has informed me that you are assigned to the following Licence Applications. I have completed the Preliminary Technical Review for these applications and they generally appear to be in good order. However, I am requesting clarification on a few issues, before finalizing the PTR and sending the Application out for external review.

1BR-CL10914

Pursuant to Section K, Item 2 of the Licence, and Items G and H of the Annual Report requirements, a tabular summary of all sampling results are required from the monitoring program locations. Did any water and soil quality sampling occur at the DEW site in 2009 and 2010?

1BR-LOR0813

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 ie. closure report?

4. Part K, Item 9 of the Licence states that the Licensee must submit for approval a QA/QC Plan supported by a certified lab (CALA) 30 days prior to any discharge. This was never submitted. 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, but if a QA/QC exists it should be submitted.

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

Kind regards,

