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NUNAVUT WATER BOARD  
NUNAVUT IMALIRIYIN KATIMAYINGI  
OFFICE DES EAUX DU NUNAVUT

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File No.: 1BR-MDR----

November 15, 2010

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**RE: Preliminary Technical Review (PTR) for File No. 1BR-MDR----, Phase - 111  
Remediation, Sylvia Grinnell Park Dump (Iqaluit Airport Metal Dump)**

Dear Christopher Aguirre and Mike Molinski:

The Nunavut Water Board (“NWB”) received on June 1, 2010, a licence application from Transport Canada to allow for the deposit of waste in support of a Phase III remediation project for the Sylvia Grinnell Park Dump (metal dump site at the Iqaluit Airport). On June 14 and 22, 2010, the NWB acknowledged receipt and informed Transport Canada that the following documents were outstanding and had to be submitted before the application could be processed:

- A Spill Contingency Plan (SCP);
- A Remediation Action Plan(RAP);
- Details on whether the contaminated soil will be transported to a landfill facility away from the site being remediated;
- Confirmation on whether the access ramp/road to the base of the dump involves any river crossing;
- Specific with respect to long-term monitoring;
- NIRB Screening Decision; and
- NPC Conformity.

On August 27, September 27, 2010, and November 2, 2010, respectively, the NWB reminded Transport Canada to submit the outstanding information so that the application to be processed.

In response to the NWB's request, on November 10, 2010, the Nunavut Water Board received the following submissions from Transport Canada:

- Spill Contingency Plan (SCP);
- Monitoring Plan separate;
- Remedial Action Plan; and
- Responses to questions with respect to the transport and disposal of contaminated soil, potential river crossings and long-term monitoring.

The results of the reviews conducted on the above-mentioned plans are as follow:

### **Spill Contingency Plan**

The spill contingency plan should be revised to include following items:

- A title page, page numbers, table of contents, an introduction, date prepared, and effective date;
- Information on the purpose and scope of the plan;
- Procedures for responding to spills on ice, water and land;
- Details on training provided to personnel affiliated with the project;
- A copy of the NT-NU spill report form;
- Copies of or reference to MSDS for substances that will be stored or potentially encountered on site;
- The contact information for INAC's Manager of Field Operation, EC, DFO, QIA, GN-DOE, and NWB; and
- A detailed site map, in an appropriate scale, depicting the location of spill kits and equipment, project infrastructure, nearby water bodies and other relevant information.

The Board notes Transport Canada's assertion that contractors carrying out the remedial work will provided spill contingency equipment; nevertheless, the responsibility for developing and implementing a comprehensive Spill Contingency Plan does belong to the Licensee or potential Licensee, which in this case is Transport Canada. Any spill plan or measure provided by a contractor should merely be incorporated into Transport Canada's overall Spill Contingency Plan.

### **Remediation Action Plan**

The monitoring plan should be revised to include at least the following items:

- A title page, page numbers, table of contents, date prepared, effective date, introduction, site history and site location;
- Sited characteristic including, climatic conditions, terrain and geology;
- Scope of work to be undertaken;
- Detailed inventory on the type or category of waste present on the site;
- Details with respect to the removal of hazardous materials, including hydro-carbon impacted soil, and non-hazardous material from the site

- Measures to control fine particulates that can potentially become airborne during remedial activities; and
- The phase/stages in which the remediation will be carried out and what each stage/phase will involve; and
- Measures to secure the site from wild life and unauthorized personnel;

Transport Canada indicated that the PHASE I/II ENVIRONMENTAL SITE ASSESSMENT report from Franz Environmental Inc., dated February 2009, contained a Remedial Action Plan. However, the information provided in that report is a conceptual remedial action plan that include options for remediation as opposed to site-specific remedial action plan, which is required for the project.

Should you have any questions, please feel free to contact the undersigned at 867-360-6338 ext. 25 or by email at [sjoseph@nunavutwaterboard.org](mailto:sjoseph@nunavutwaterboard.org).

Yours truly,

*Original Signed By:*

Sean Joseph  
Technical Advisor