



Indigenous and
Northern Affairs Canada

Affaires autochtones
et du Nord Canada

Your file - Votre référence
1BR-MDR----

June 7, 2017

Our file - Notre référence
IQALUIT-#1150382

Licensing Department
Nunavut Water Board
P.O. Box 119
GJOA HAVEN, NU, X0B 1J0

Sent via email: licensing@nwb-oen.ca

**Re: Technical Review of Water Licence Application (No. 1BR-MDR----) – Former
Iqaluit Metal Dump Remediation (Transport Canada)**

To Whom It May Concern,

Thank you for the Nunavut Water Board's May 17, 2017 notice of the above mentioned water licence application.

A memorandum is provided for the Nunavut Water Board's consideration. Comments and recommendations have been provided pursuant to Indigenous and Northern Affairs Canada's mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

Please do not hesitate to contact me by telephone at 867-975-3877 or email at Amanda.Winegardner@aandc-aadnc.gc.ca for further information.

Sincerely,

Amanda Winegardner
Water Management Specialist
Water Resources Division
Indigenous and Northern Affairs Canada
P.O. Box 100
Iqaluit, NU X0A 0H0

Encl.

Cc. Ian Parsons, A/Manager, Water Resources, INAC, Nunavut Regional Office (NRO)
Erik Allain, Manager, Field Operations, INAC, NRO

Canada 

Memorandum

To: Licensing Department, Nunavut Water Board

From: Amanda Winegardner, Water Management Specialist, Indigenous and Northern Affairs Canada (INAC)

Cc: Ian Parsons, A/Manager, Water Resources, INAC
Erik Allain, Manager, Field Operations, INAC

Date: June 7, 2017

Re: Technical Review of Application No. 1BR-MDR---- for Former Iqaluit Metal Dump Remediation Project

Applicant: Transport Canada
Project: Former Iqaluit Metal Dump Remediation Project
Region: Qikiqtani

Comments:

A. Background

Transport Canada (the Applicant) has applied for a new Type 'B' Water Licence to support the "Former Iqaluit Metal Dump Remediation Project". The Water Licence is meant to cover water use and waste disposal activities associated with remediation of a former bulky metal disposal area near the Sylvia Grinnell River (Iqaluit). The Applicant has proposed to complete remediation activities between summer 2017 and December 2020 to formally decommission this site, including: removal of debris and metal materials, removal of contaminated soil and sediments, temporary diversion of a drainage feature in order to remove contaminated sediments, drainage feature improvement, swale design to divert precipitation and meltwater away from decommissioned landfill slopes and the collection of surface water samples around the site to monitor the remediation efforts.

The Applicant has proposed water use of less than 50 m³ per day (with projected total use of 0.1 m³), to be used for surface water sampling. The Applicant has indicated that all water temporarily diverted to perform remediation activities will be returned to the sources. Waste remediated from the site will be disposed of in off-site facilities. The project is not expected to generate additional waste.

The Applicant has requested 3.5 year Water Licence term, covering late spring/early summer 2017 to December 2020.

B. Results of review

On behalf of INAC's Water Resources Division, the following comments and recommendations are provided for the NWB's consideration:

1. **Building of temporary access road**

Source:

- 1) 1BR-MDR---- Water Licence Application Form- Former Iqaluit Metal Dump, Section 9: 'Description of Undertaking'

Comment: The Applicant has described the construction of a temporary access road from the top of the escarpment part of the site to be remediated to a lower area that will be used to remove debris and contaminated material from the site. The Applicant has further stated that this temporary access road is not expected to cross any drainage features.

Recommendation 1: INAC recognizes that this road is to be temporary in nature and is likely to be quite short in length. However, INAC recommends that the Applicant advise whether any water use will be required for dust suppression on this road. If the operation of the road will require water use, it is recommended that this be accounted for in the Water Licence.

Recommendation 2: INAC reminds the Applicant to use best practices for erosion control when constructing the temporary access road, particularly if the road ends up having to cross any drainage features.

2. **Storage and containment of removed contaminated soil and sediments**

Source:

- 1) 1BR-MDR---- Water Licence Application Form- Former Iqaluit Metal Dump, Section 9: 'Description of Undertaking'

Comment: The Applicant has indicated that contaminated soil and sediments will be removed from the site and will be either deposited at an on-site landfill or the Iqaluit land treatment unit, or packaged for shipment to an appropriate facility. The Applicant has also indicated that sediments may need to be dried prior to disposal.

Recommendation 3: INAC recommends that the Applicant ensure that the appropriate approvals are obtained from any receiving facilities for waste associated with this project.

Recommendation 4: INAC recommends that the Applicant ensure that they are using proper containment when drying sediments (if done). INAC also recommends that the Applicant use secondary containment when storing contaminated soil and sediments prior

to disposal.

3. Proposed term of licence

Source:

- 1) 1BR-MDR---- Water Licence Application Form- Former Iqaluit Metal Dump, Section 25: 'Proposed Term of Licence'

Comment: The Applicant has requested a 3.5 year licence term.

Recommendation 5: INAC recommends that any issued Water Licence be for the requested 3.5 year term. INAC reminds the Applicant that they will be required to meet any monitoring or reporting conditions outlined in the licence for the duration of the licence term (even after major remediation activities are completed).