



Water Resources Division  
Resource Management Directorate  
Nunavut Regional Office  
P.O. Box 100  
Iqaluit, NU, X0A 0H0

Your file - Votre référence  
1BR-MDR1721  
Our file - Notre référence  
GCDocs#94328189

May 05, 2021

Mr. Richard Dwyer  
Manager of Licensing  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, NU, X0B 1J0  
E-mail: [licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca)

**Re: Crown-Indigenous Relations and Northern Affairs Canada's review of Water Licence 1BR-MDR1721 Renewal Application for the Iqaluit Metal Dump Remediation Project, Transport Canada**

Dear Mr. Richard Dwyer,

Thank you for your April 21, 2021 email request for review and comments on the additional documents of the above-noted water licence renewal application.

Pursuant to its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*, Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) reviewed the renewal application documents and has the following comments and recommendations to provide to the Nunavut Water Board for consideration.

CIRNAC notes that in the most recent 2020 Monitoring Report (i.e., Compliance Long Term Monitoring For Transport Canada at the Former Iqaluit Metal Dump Iqaluit, Nu) prepared by BluMetric™ Environmental, one of the eight surface water samples exceeded the Freshwater CCME (Canadian Council of Ministers of the Environment) CWQG (Canadian Water Quality Guideline for the Protection of Aquatic Life) limit for zinc and five of the eight sediment samples exceeded the applicable CCME Canadian Sediment Quality Guidelines for the Protection of Aquatic Life (SQGPAL) limits for PHC-F2, PHC-F3, chromium, cadmium, lead, zinc, and total PCBs.

CIRNAC also notes that in the 2020 Monitoring Report, among the eight surface water and the eight sediment samples, one duplicate sample was collected and analyzed for



surface water and one for sediment for the purpose of QA/QC (Quality Assurance/Quality Control). The relative percentage difference (RPD) between the duplicate sample pairs is above 40% - a limit recommended by CCME - for six measured parameters and among them, at least four (i.e., PHC-F2, lead, zinc, and total PCBs) exceeded the applicable CCME limits.

CIRNAC is concerned with the quality of the monitoring results; the discrepancies in the duplicates could indicate a problem with sampling methods and put in question the accuracy of the reported results. CIRNAC recommends that the licensee re-evaluate and, if necessary, revise its sampling and QA/QC plans prior to the next monitoring event so that the quality of the monitoring results could be assured in carrying out future monitoring activities.

CIRNAC would also like to note that although it is stated on page 15 of the 2020 Monitoring Report that “(T)he full RPD results for the duplicate pairs are provided in Table 17 for surface water and Table 18 for sediment”, both Table 17 and Table 18 could not be found in the report. We recommend that all tables be included in future reports.

CIRNAC appreciates the opportunity to participate in this review. If there are any questions, please contact me at [david.zhong@canada.ca](mailto:david.zhong@canada.ca), or Sarah Forté at [sarah.forte@canada.ca](mailto:sarah.forte@canada.ca).

Sincerely,

David Zhong  
Regulatory and Science Advisor