



Environmental Protection Operations Directorate
Prairie & Northern Region
5019 52nd Street, 4th Floor
P.O. Box 2310
Yellowknife, NT X1A 2P7

ECCC File: 6600 000 056/002
NWB File: 1BR-MDR1721

August 31, 2017

Via email to: licensing@nwb-oen.ca

Richard Dwyer
Licence Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0

Dear Richard Dwyer:

**RE: 1BR-MDR1721 – Transport Canada – Iqaluit Former Metal Dump and
Community Landfill – Performance and Long Term Monitoring Plan**

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above-mentioned Performance and Long Term Monitoring Plan and is submitting comments via email as requested by the NWB. ECCC's specialist advice is provided based on our mandate, in the context of the *Canadian Environmental Protection Act*, the pollution prevention provisions of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

The following comments are provided:

1. Section 5 – Remedial Performance Monitoring Plan

During the active remediation there will be ongoing performance monitoring to ensure that mitigation measures to reduce additional impacts are performing as anticipated. The proposed monitoring parameters are temperature, turbidity and total dissolved solids using field instrumentation. ECCC notes that the potential contaminants that have been identified at site are not included in the monitoring plan (metals, PHCs, PAHs, etc). During active remediation, especially in close proximity to water bodies, there is the potential for contaminants to be remobilized and enter a water body. Additional parameters which are identified as potential contaminants should be include in the monitoring program.

ECCC recommends that the Proponent include identified potential contaminants (metals, PHCs, PAHs, etc.) as monitored parameters submitted for analysis.

2. Section 6.1.1.2 – Monitoring Plan: Visual Monitoring

The Performance and Long Term Monitoring Plan states that regular visual inspections will be conducted to check the physical integrity of the isolation cover and to look for evidence of erosion, frost action, animal burrows, vegetation, staining, seepage points, exposed debris, breeches in the cover, condition of monitoring instruments and condition of the warning signs. No specifics are provided on what frequency constitutes “regular” monitoring.

ECCC recommends that the Proponent provide a monitoring schedule that includes the frequency of visual monitoring be provided.

3. Section 6.1.4.2 – Monitoring Plan: Surface water sampling, Section 6.1.5.2 – Monitoring Plan: Sediment Sampling

The surface water sampling and sediment sampling sections indicate location of sampling but do not indicate frequency or sampling schedule.

ECCC recommends that the Proponent provide specifics on the surface water and sediment monitoring schedule.

Should you require further information, please do not hesitate to contact me at (867)669-4732 or Emily.Nichol@canada.ca.

Sincerely,



Emily Nichol
Environmental Assessment Coordinator

cc: Bradley Summerfield, Senior Environmental Assessment Coordinator
Georgina Williston, Head, Environmental Assessment North (NT and NU)