



NWB Tools

Richard Dwyer <richard.dwyer@nwb-oen.ca>

1BR-PEL1016 Renewal Application: Clarification

TLA Consultants <slines@tlaconsultants.ca>

Thu, May 24, 2018 at 6:12 AM

To: Laura.D'Costa@forces.gc.ca

Cc: ktunaley@tlaconsultants.ca, ALISON.STREET@forces.gc.ca, karen.kharatyan@nwb-oen.ca, Richard Dwyer <richard.dwyer@nwb-oen.ca>

Good morning Laura,

Thank you for the update and plan forward.

I'll check with Richard at the NWB office but I haven't seen if any INAC inspection reports were received following the letter that went out on this file. Have you been provided with anything from INAC? I believe you had put a call in to the INAC office as well in follow up to the letter.

Regards,

Steve

From: Laura.D'Costa@forces.gc.ca [mailto:Laura.D'Costa@forces.gc.ca]

Sent: May 18, 2018 12:07 PM

To: slines@tlaconsultants.ca

Cc: ktunaley@tlaconsultants.ca; ALISON.STREET@forces.gc.ca; karen.kharatyan@nwb-oen.ca

Subject: RE: 1BR-PEL1016 Renewal Application: Clarification

Hello Mr. Lines,

Thank you for the call as well.

As part of our discussion I am asking our Environmental Working Group to provide a technical summary with more details regarding why they disagree with the Consultant's conclusions/recommendations in the 2016 CAM-4 Monitoring Report. I am doing this under contract through a change order (multiple steps involved with the Contract Authority), and at the moment the earliest possible date that the EWG have told me they can get this to me as a draft is June 22, 2018. I have also discussed this with our Consultant Arcadis, and will give them an opportunity to respond (which may also require a contract amendment – tbd).

With this in mind I don't anticipate having this sorted until the end of July/early August. At this point in time, based on the EWG's review we had not intended on returning to CAM-4 this year; however I can plan for a return to CAM-4 in 2019 if it is deemed to be technically necessary.

I will work on a summary of key issues and recommendations that I can also provide. This cannot be fully completed until the difference in technical opinion is sorted on the 2016 monitoring program between the EWG and the Consultant. I will add it in to the summary as soon as solved, and will send you the complete summary as soon as possible.

Sincerely, Laura

From: Steve Lines [mailto:slines@tlaconsultants.ca]
Sent: April-17-18 11:00 AM
To: D'Costa LN@ADM(IE) DCLSPD@Ottawa-Hull <Laura.D'Costa@forces.gc.ca>
Cc: ktunaley@tlaconsultants.ca; Street AM@ADM(IE) DCLSPD@Ottawa-Hull <ALISON.STREET@forces.gc.ca>
Subject: Re: 1BR-PEL1016 Renewal Application: Clarification

Hi Laura

Thank you for the call yesterday to discuss CAM-4.

I advised Karen that you plan to double check with INAC if there are any inspection reports outstanding and that you will respond to his email below to indicate a timeframe for providing the information we discussed (summary of key issues encountered at CAM4 and recommendations made by the site contractors during phase I and initial phase II monitoring based on the reports and how those were addressed with some additional discussion for each).

If you have any questions please let me know and we can have another call.

Regards

Steve

Sent from my iPhone

On Apr 16, 2018, at 11:24 AM, <Laura.D'Costa@forces.gc.ca> <Laura.D'Costa@forces.gc.ca> wrote:

Hello Mr. Lines,

We are available today at your convenience anytime between 12:00 and 16:00 EST. Please advise of the best timing for you. I will book a boardroom on my end and can either call you (please

provide a number) or provide teleconference details. Please advise,

Sincerely, Laura

From: TLA Consultants [<mailto:slines@tlaconsultants.ca>]
Sent: April-15-18 11:13 PM
To: D'Costa LN@ADM(IE) DCLSPD@Ottawa-Hull <Laura.D'Costa@forces.gc.ca>
Cc: 'Karlette Tunaley' <ktunaley@tlaconsultants.ca>
Subject: FW: 1BR-PEL1016 Renewal Application: Clarification

Hi Laura,

I'm working on behalf of the NWB during a transition period as they bring on new staff. Your CAM-4 renewal application has been assigned to me to process and I'd like to set up a call with you to obtain some clarification on the file background.

I'm available at 1200 or 1700 Monday (tomorrow), or 0930 Tuesday. Shouldn't take more than about 30 minutes.

Thank you,

Steve

Stephen Lines M.Sc.

TUNALEY, LINES & ASSOCIATES

Environment, Regulatory and Community

From: ktunaley@tlaconsultants.ca [<mailto:ktunaley@tlaconsultants.ca>]
Sent: April 3, 2018 9:32 PM
To: slines@tlaconsultants.ca
Subject: FW: 1BR-PEL1016 Renewal Application: Clarification

From: Laura.D'Costa@forces.gc.ca [mailto:Laura.D'Costa@forces.gc.ca]
Sent: April-03-18 11:35 AM
To: karen.kharatyan@nwb-oen.ca
Cc: ALISON.STREET@forces.gc.ca; ktunaley@tlaconsultants.ca; licensing@nwb-oen.ca
Subject: RE: 1BR-PEL1016 Renewal Application: Clarification

Dear Ms. Kharatyan,

Please find this email as a preliminary response to address your largest concerns, we will follow with a letter to address everything shortly.

This email is intended to address 2 concerns: i) the missing monitoring reports; and ii) the 2016 Arcadis Recommendation to monitor CAM-4 annually. Please take a look at the information herein, and advise if you would like to discuss anything further. I would be happy to schedule a call.

Concern 1: Missing Monitoring Reports

On December 15, 2017, DND sent the attached email with a letter to the attention of Ms. Ene to respond to INAC's Letter. With respect to the Monitoring reports, within this letter, DND outlined the following as excerpted below. Should there be any difficulty finding the reports sent on December 12, 2017, we would be happy to resend them. I did not include the emails with the reports again herein at this time due to the file size. They were sent to the attention of Ms. Ene. Please advise if you would like DND to resend these and we will do so right away.

December 15, 2017, excerpt from the letter:

"DND Response:

It is standard practice every year for Defence Construction Canada, on behalf of the Department of National Defence, to submit the annual reports to the NWB once they are finalized. DND conducted a search of the NWB public registry where reports are normally located, and provided on December 12, 2017 another digital copy of any reports not found. Although not on the public registry, the missing reports should be otherwise available at the NWB; the December 12, 2017 submission was for ease of updating the public registry without having to search through historical correspondence.

- 2010: DND emailed a copy of the annual report to NWB on December 12, 2017.
- 2011: Located on NWB public registry ([http://www.nwb-oen.ca/public/registry/1%20INDUSTRIAL/1B/1BR%20-%20Remediation/1BR-PEL1016%20CAM%204/3%20TECH/10%20MONITORING%20\(J\)/120330%201BR-PEL1016%20DEW%20Line%20Clean%20Up%20Proj%20Mon%20Report%202011/](http://www.nwb-oen.ca/public/registry/1%20INDUSTRIAL/1B/1BR%20-%20Remediation/1BR-PEL1016%20CAM%204/3%20TECH/10%20MONITORING%20(J)/120330%201BR-PEL1016%20DEW%20Line%20Clean%20Up%20Proj%20Mon%20Report%202011/))
- 2012: Site not monitored, no annual report.

- 2013: DND emailed a copy of the annual report to NWB on December 12, 2017.
- 2014: Site not monitored, no annual report.
- 2015: Site not monitored, no annual report.
- 2016: Located on NWB public registry ([http://www.nwb-oen.ca/public/registry/1%20INDUSTRIAL/1B/1BR%20-%20Remediation/1BR-PEL1016%20CAM%204/3%20TECH/10%20MONITORING%20\(J\)/2016%20Long%20Term%20Landfill%20Monitoring/](http://www.nwb-oen.ca/public/registry/1%20INDUSTRIAL/1B/1BR%20-%20Remediation/1BR-PEL1016%20CAM%204/3%20TECH/10%20MONITORING%20(J)/2016%20Long%20Term%20Landfill%20Monitoring/))

Concern 2: 2016 Arcadis Recommendation to Monitor one Feature (Feature K) at the CAM-4 Tier II Facility Annually:

As per Section 7.1 of the *Agreement Between Nunavut Tunngavik Incorporated and Her Majesty in the Right of Canada as Represented by the Minister of National Defence for the Clean-up and Restoration of Distant Early Warning Sites Within the Nunavut Settlement Area* (NTI-DND Environmental Provisions, September 1998), an Environmental Working Group (EWG) has been established to examine the results of the DEW Line monitoring program. The EWG consists of two members chosen by DND and two members chosen by NTI.

As per Section 7.3 of the NTI-DND Environmental Provisions (September 1998), should changes to the monitoring plan and/or additional remediation be required, the EWG is responsible for making recommendations to the DEW Line Steering Committee on what action(s) should be taken. In accordance with the process, DND then takes action based on Steering Committee decisions.

Please find attached the EWG's letter in response to the more frequent monitoring recommendation at CAM-4. Please see the Summary Letter and Section 4 of the attached Meeting Minutes. The EWG wrote: "The EWG has further reviewed Feature K and concurs with our original assessment that the Feature should be rated as "Acceptable" and not

"Marginal". As such, there is no requirement of any additional monitoring in advance of the 2021 monitoring event."

DND's next step would be to discuss this with the NTI at the next Steering Committee Meeting. This meeting was originally scheduled for April 25, 2018, but is now being re-scheduled based on availability (new date to be determined). The NTI (Bert Dean) does have a copy of this EWG letter and the associated meeting minutes.

Sincerely, Laura

Laura D'Costa, P.Eng., M.Sc.

Senior Project Manager, Directorate of Contaminated Sites

Department of National Defence / Government of Canada

Laura.DCosta@forces.gc.ca / Office: 613-943-7852 / Mobile: 613-898-2686

Gestionnaire principale de projets, Direction des sites contaminés

Ministère de la Défense nationale / Gouvernement du Canada

Laura.DCosta@forces.gc.ca / Bureau: 613-943-7852 / Portable: 613-898-2686

From: Karén Kharatyan [<mailto:karen.kharatyan@nwb-oen.ca>]

Sent: March-29-18 1:43 PM

To: D'Costa LN@ADM(IE) DCLSPD@Ottawa-Hull <Laura.D'Costa@forces.gc.ca>

Cc: Street AM@ADM(IE) DCLSPD@Ottawa-Hull <ALISON.STREET@forces.gc.ca>; Karlette Tunaley <ktunaley@tlaconsultants.ca>; Licensing Department <licensing@nwb-oen.ca>

Subject: 1BR-PEL1016 Renewal Application: Clarification

Dear Ms. D'Costa,

Please find attached the NWB Correspondence regarding the renewal application for water licence 1BR-PEL1016.

Regards,

<image001.jpg>