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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

File Nos.: **1BR-BYR1320** **1BR-GLA1531**
1BR-CAM0520 **1BR-HAL1533**
1BR-CAP1623 **1BR-JEN1323**
1BR-DYE1623 **1BR-LON1422**
1BR-FOD1320 **1BR-MAC1323**
1BR-FOX1523 **1BR-PEL1833**
1BR-FRA1730 **1BR-QIK1320**
1BR-SHE1733

September 27, 2019

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RE: NWB Technical Review of Annual Reports for Water Licences for DND DEW Line Site Post-Remediation Long-Term Monitoring Programs

Dear Ms. D'Costa and Ms. Street:

The Nunavut Water Board (NWB or Board) has completed a technical review of the Annual Report submissions for Water Licences for the post-cleanup monitoring at the former DEW Line Sites in Nunavut currently managed by the Department of National Defence (DND). Overall, the following Monitoring Report submissions were considered during this technical review:

Site	Licence Number	Monitoring year		
		2015	2016	2017
PIN-2	1BR-CAP1623	Previously reviewed	Reviewed in 2019	Not Monitored
PIN-3	1BR-FRA1730	Previously reviewed		Not Monitored
PIN-4	1BR-BYR1320	Reviewed in 2019	Reviewed in 2019	Reviewed in 2019
CAM-M	1BR-CAM0520	Reviewed in 2019	Not Submitted	Not Monitored
CAM-1	1BR-JEN1323	Not Monitored	Reviewed in 2019	Not Monitored
CAM-2	1BR-GLA1531	Reviewed in 2019	Not Submitted	Not Monitored
CAM-3	1BR-SHE1733	Previously reviewed		Not Monitored
CAM-4	1BR-PEL1833	Previously reviewed		

CAM-5	1BR-MAC1323	Reviewed in 2019	Not Submitted	Reviewed in 2019
FOX-M	1BR-HAL1533	Not Monitored	Not Submitted	Reviewed in 2019
FOX-2	1BR-LON1422	Reviewed in 2019	Reviewed in 2019	Not Monitored
FOX3	1BR-FOD1320	Reviewed in 2019	Reviewed in 2019	Not Monitored
FOX-4	1BR-FOX1523	Not Monitored	Reviewed in 2019	Not Monitored
FOX-5	1BR-QIK1320	Not Monitored	Reviewed in 2019	Not Monitored
DYE-M	1BR-DYE1623	Previously reviewed	Reviewed in 2019	Reviewed in 2019

Upon receipt, all above-mentioned submissions were distributed for public review. No comments have been received to date.

The technical review of the above-mentioned submissions determined that the information provided generally addresses the requirements of respective Water Licences and could be deemed acceptable. The Board understands that the long-term monitoring involves intermittent monitoring events often separated by a number of years. Therefore, the Board does not require a comprehensive Annual Report from the Licensee during non-active years, however, in place of an Annual Report the Licensee shall continue to provide written notification to the Board indicating that no sampling events occurred at the site for the given year.

Additionally, the NWB notes that the following deficiencies should be addressed in order to ensure compliance with the respective Water Licences:

Site	Licence Number	Outstanding Submissions as per respective Licence Conditions		
		Updated SCP	QA/QC Plan	Other
PIN-2	1BR-CAP1623	Part I, Item 2	Part K, Item 10	
PIN-3	1BR-FRA1730			
PIN-4	1BR-BYR1320	Part H, Item 2		
CAM-M	1BR-CAM0520			
CAM-1	1BR-JEN1323			Part J, Item 2
CAM-2	1BR-GLA1531	Part I, Item 2		
CAM-3	1BR-SHE1733	Part I, Item 2	Part K, Item 4	
CAM-4	1BR-PEL1833			
CAM-5	1BR-MAC1323			
FOX-M	1BR-HAL1533			
FOX-2	1BR-LON1422	Part G, Item 1		
FOX3	1BR-FOD1320			
FOX-4	1BR-FOX1523	Part I, Item 2	Part K, Item 10	
FOX-5	1BR-QIK1320	Part H, Item 2		Part J, Item 1
DYE-M	1BR-DYE1623			Part K, Items 2 & 12

The Board would like to remind the Licensee that under Part J, Item 7, Part J, Item 8, and Part J, Item 7 of the respective Water Licences Nos. 1BR-BYR1320, 1BR-FOD1320, and 1BR-QIK1320, the NWB has included a requirement for the Licensee to submit a Preliminary Phase II Monitoring Summary Report as part of the Application to renew these Licences in 2020.

Additionally, the Board has reviewed the Addendum to Spill Contingency Plan provided within the 2017 Annual Report submission for Water Licence No. 1BR-DYE1623 in May 2018. The technical review of the Spill Plan Addendum found it to be complete and meeting the requirements of Part I, Item 2 of current Water Licence.

The NWB also notes that the correspondence dated February 9, 2017 proposed to change the scope of the soil and groundwater Monitoring Program for all DEW Line sites currently in care of DND. The Licensee has argued that *“mercury and PCBs in groundwater, as well as mercury in soil, are not useful indicators of potential landfill failure”* and recommended that *“mercury analysis be removed from the DEW Line soil and groundwater monitoring program and that PCB analysis be removed from the DEW Line groundwater monitoring program.”* The Board would like to remind the Licensee that modifying the Monitoring Programs requires Amendment to the respective Water Licences. The NWB will provide further correspondence with this respect.

Should you have any questions, please feel free to contact the undersigned at (867) 360-6338 (extension 29) or sergey.kuflevskiy@nwb-oen.ca, at your earliest convenience.

Sincerely,



Sergey Kuflevskiy
Nunavut Water Board,
Technical Advisor

Cc: Distribution List – Qikiqtani/ Kitikmeot/ Kivalliq