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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

File: 1BR-RAN0914/TR/H1,I1,E6

September 16, 2010

Mr. Wayne Thistle
Regional Projects Manager
Government of Nunavut
Dept. of Community & Government Services,
PO Bag 002
Rankin Inlet, NU, X0C 0G0
Email: WThistle@gov.nu.ca
ron@fsc.ca

Subject: Review of Spill Contingency Plan, Abandonment and Restoration Plan & Operation and Maintenance Plan.

Dear Mr. Thistle:

The Nunavut Water Board (NWB or Board) received the Spill Contingency Plan (SCP), Abandonment and Restoration (A&R), and Operation and Maintenance (O&M) Plan on March 27, 2009. The Plans were distributed for review and comment by interested parties on April 3, 2009. The SCP, A&R Plan, and O&M Plan address conditions under Part H, Item 1; Part I, Item 1; and Part E, Item 6 of Licence 1BR-RAN0914 held by the Government of Nunavut Department of Community and Government Services for the operation of a Landfarm Facility. The NWB received comments on the plans from Environment Canada (EC) and Indian and Northern Affairs (INAC) which have been available on the NWB's ftp site at the following link:

<ftp://nunavutwaterboard.org/1%20PRUC/1%20INDUSTRIAL/1B/1BR%20-%20Remediation/1BR-RAN0914/3%20TECH/>

Please note that the O&M Manual is located in the folder entitled "undertaking", while the A&R Plan and SCP are located in their respective folders.

The NWB has undertaken a review of the documents and comments received. With respect to the SCP, INAC provided the correct contact information for the Water Resources Officer. EC found that the SCP meets the minimum requirements of the Licence but recommended the plan include additional information, which the NWB believes should be considered in future revisions of the plan, as may be required in accordance with Part B, Item 1(g). The NWB has determined that the SCP meets the requirements of the Licence and it therefore has been approved by the Board under Motion #2010-15-L03.

With respect to the A&R Plan, the NWB finds that it has been insufficiently developed to address the Licence requirements, particularly in the areas of decommissioning procedures (Part I, Item 1(e)) and sampling (Part I, Item 1(f)). The NWB further expects that the A&R Plan be developed to incorporate other applicable Licence conditions, including those under Part D, Items 4,5,7 & 8. The NWB would also draw the Licensee's attention to the comments provided by EC and INAC, which are to be incorporated into a revision of the plan, where appropriate. The NWB requests that a revised A&R Plan be submitted within sixty (60) days of this letter, for Board approval in writing.

With respect to the O&M Plan, the NWB has made a similar finding that the Plan should reflect the Licence conditions, particularly those related to Part D: Conditions Applying to Waste Disposal. Although the O&M Plan states that water will not be discharged from the Landfarm, the Plan should reflect the Effluent discharge criteria provided in the Licence in the event discharge is required. The NWB also notes that condition Part D, Item 8 requires that the Licensee confirm the quality remediation objectives with the Government of Nunavut (GN). This should be documented within the plan. As well, the O&M Plan does not reference the GN's Environmental Guideline for Site Remediation (March 2009), which outlines guidelines for soil. Based on the review of the NWB and the comments provided by EC and INAC, which should be incorporated into a revision of the plan, where appropriate, the NWB requests that a revised O&M Plan be submitted within sixty (60) days of this letter, for Board approval in writing.

For the revision of both the A&R Plan and O&M Plan, the Licensee shall provide a concordance table indicating where changes have been made to address the issues identified by the NWB, EC and INAC.

The above-mentioned Plans and submissions have been posted to the NWB's ftp site. Should you have any questions please contact the NWB office.

Yours truly,

Original signed by P. Beaulieu (for)

David Hohnstein, C.E.T.
Director Technical Services

DH/tla/sl

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Attached: Comments: EC, INAC