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NUNAVUT WATER BOARD
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Philippe Simon, LDS Consultants
c/o Qikiqtaaluk Corporation
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Date: July 24, 2001

Re: NWB5RES9803 – Resolution Island Project- *Annual Report 2000* with supporting documentation, *Summary of 2000 Activities & Scientific Investigation Reports*

Dear Mr. Simon:

The Nunavut Water Board has reviewed Qikiqtaaluk Corporation's "Annual Report 2000" with supporting documentation: the "Summary of 2000 Activities" by LDS Consulting and "The Resolution Island 2000 Scientific Investigation" by the Analytical Services Unit (ASU) of Queen's University, received April 19, 2001 in compliance with Part B, Item 1 of their current water licence.

During the year 2000 season, on-site activities were primarily conducted as planned except for the reconstruction of the camp due to a polar bear attack, replacement of water tanks, road repair, the relocation of the sewage lagoon and the use of a mobile testing lab. The NWB would like to remind the proponent that under Part H, Item2;

"The Licensee shall provide as-built plans and drawings of the modifications referred to in this Licence within ninety (90) days of completion of the modification."

Please submit as-built drawings of the new sewage lagoon, in addition to a site map with the new sewage lagoon depicted.

The NWB recognizes that mobile scientific testing lab uses water, gases and chemicals in its operation and is a modification to the original project proposal approved by the Board on July 31, 1998. Amendments to "The Resolution Island Project- Spill & Fire Safety Emergency Plan" are required in order to incorporate the use of the mobile testing lab into this Plan, as per Part G, Item 4, which reads:

“The Licensee shall annually review the Spill Contingency Plan and modify the Plan to reflect changes in operation, technology and personnel. Any proposed modifications shall be re-submitted to the Board for approval.”

Please re-submit a Spill Contingency Plan that addresses contingency against malfunctions and accidents at the lab, including Material Safety Data Sheets (MSDS) for the lab, as well as the items listed in the Board’s conditional approval letter of the Spill Contingency Plan, dated June 26, 2001.

The “Annual Report 2000” refers to the ASU Report, entitled “The Resolution Island 2000 Scientific Investigation” for information on the Surveillance Network Program (SNP). Although the NWB finds the information contained in the report useful for general monitoring purposes, Part B, Item 1.e. requires that “tabular summaries of all data and information generated under the SNP” be contained within the Annual Report. The ASU Report gives general monitoring data but does not specifically address the needs of the SNP by citing the SNP stations, and information required under Schedule 1 of the water licence. **In future, Qikiqtaaluk Corporation should endeavor to provide the Board with tabular data on each specific the SNP stations along with the sampling date and numbers of samples taken for each parameter listed in the Licence and tested.**

The NWB has noticed that levels of PCB from soil samples and contamination from the drainage pathway at the furniture dump and S1/S4 valley have exceeded the 50ppm limit (p. III-28, Table III-4, III-8 & III-9 of ASU Report). **Since the furniture dump is considered “completed remediated” (LDS, page 14), the Board would like to know whether these levels represent final reclamation in this area and whether the single contamination barrier will be sufficient to ensure the uptake of PCBs to the acceptable limit over the longterm. Furthermore, the Board would also like to know of any future plans to monitor and remediate the areas specific to these results, in order to meet the compliance level of 50ppm of PCB.**

In the “Summaries of Activities 2000”, PCB levels exceeding 50ppm were found near the road by the Department of National Defence (DND) NWS helipad (p. III-36). It is written that DIAND has informed DND of the contamination. **The NWB would like copies of the correspondence between DIAND and DND regarding this contaminated DND parcel of land and any future plans and/or arrangements to clean it up.**

Finally, although the DIAND Inspector Philippe Lavallee indicated in his report dated November 15, 2000 that “besides a low pH, the analytical results from the lower level metal landfill (figure 5) sample proved relatively benign,” the Board is aware of the low pH and high metals seem to be appearing in other areas on site (e.g. p. V-7) as indicated in the ASU Report. Data from the Lake Water Results, Table V-2 and Beach POL Tanks V-3 of the ASU Report shows exceedances of the Canadian Council of Ministers of the Environment (CCME)’s *Canadian Water Quality Guidelines*, December 1996 and *Interim Canadian Environmental Quality Criteria for Contaminated Sites*, EPC-CS34 in September 1991, respectively. **The Board would like to gain further understanding from Qikiqtaaluk Corporation as to how they believe the low pH and high level of metals, such as zinc, lead, copper and phenols are interacting to produce these results and whether further monitoring and mitigation is necessary in order to ensure the receiving water quality at Resolution Island is protected.**

If you have any concerns or questions, please do not hesitate to contact me at 867-360-6338 or by fax 867-360-6369 or e-mail dionne@polarnet.ca

Dionne Filiatrault
Technical Advisor

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