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Prairie and Northern Region  
344 Edmonton Street  
Winnipeg MB R3C 0P6

NWB Licence No: 1BR-RLF2030  
TC File No: R 7184-90-69 U

June 12, 2020

Richard Dwyer  
Nunavut Water Board  
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**RE: Nunavut Water Board (NWB) Licence 1BR-RLF2030 - Resolute Bay Landfarm – Landfarm Integrity Assessment and Improvement Report Request**

Thank you for your letter of May 19, 2020 indicating Nunavut Water Board (NWB)'s renewal of Licence 1BR-RLF2030 for the Resolute Bay Landfarm.

The NWB has requested that TC submit a *Landfarm Integrity Assessment and Improvement Report* to address the current condition of the Land Treatment Unit (LTU). Transport Canada has evaluated the risks and benefits of various options for the ongoing management of this site since Per and Poly-fluoryl alkyl substances (PFAS) were identified as a Contaminant of Concern.. In consultation with Public Services and Procurement Canada and a qualified engineering consultant, TC commissioned a Preliminary Qualitative Risk Assessment (PQRA) to evaluate the risks associated with the LTU in its current condition.

The PQRA identified that there is no risk to human health or the environment from this site as there are no receptor pathways, human (p. iii, Stantec, 2018) or ecological (p. iv, Stantec, 2018). Resolute Bay is subject to continuous permafrost, groundwater is not used as potable water, and the nearest continuous water bodies to the Site are located more than 800 m away (p. 1, Stantec, 2018). The contents of the LTU are frozen through based on TC's last in-person inspection in 2019 and are stable in place despite some degradation of the liner due to the local climate. TC is actively working to identify long term solutions to address PFAS in the LTU which would allow for closure of the site.



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Based on these considerations, it is Transport Canada's position that the PQRA sufficiently addresses short term concerns related to the integrity of the liner. TC is committed to addressing any residual impacts from the LTU at the time of decommissioning. As such, we request that the PQRA be accepted in lieu of the requested *Landfarm Integrity Assessment and Improvement Report*.

Should you wish to discuss TC's request further or should you have any questions, please contact Holly Poklitar at (204) 688-3872.

Sincerely,

Kelly Hunnie  
Regional Environmental Supervisor, Programs, Prairie and Northern Region  
Transport Canada