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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

Licence No: **1BR-RLF2030**

June 15, 2020

Kelly Hunnie
Transport Canada
Environmental Affairs – Programs
3rd Floor – 344 Edmonton St
Winnipeg, Manitoba R3C 0P6
Email: Kelly.Hunnie@tc.gc.ca

RE: Acceptance of the Preliminary Qualitative Risk Assessment (PQRA)

Dear Ms. Hunnie,

The Nunavut Water Board (the NWB or the Board) received on June 12, 2020, a request from Transport Canada (TC) to accept the Preliminary Qualitative Risk Assessment (PQRA) in lieu of the requested *Landfarm Integrity Assessment and Improvement Report*.

According to **Part E, Item 2** of Licence No: 1BR-RLF2030, the Licensee is required to submit to the Board for approval, a *Landfarm Integrity Assessment and Improvement Report* within six (6) months of issuance of the Licence. Stantec reported¹ some concerns regarding the integrity of the LTU liners. They observed numerous rips and tears of the liners at both LTU 1 and LTU 2 during their inspection. The Board requested the *Landfarm Integrity Assessment and Improvement Report* to assess and propose engineering options for improving the berms and prevent accumulated surface water from overflowing or blowing over the berm of Landfarm Facility.

Transport Canada, in their letter dated June 12, 2020, explained that there is no risk to human health or the environment from this site as there are no receptor pathways, human or ecological. 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. The contents of the LTU are frozen, 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. It is TC's position that the Preliminary Qualitative Risk Assessment (PQRA), which was submitted along with the renewal application, sufficiently addresses short-term concerns related to the integrity of the liner.

Based on these considerations, the NWB accepts that the PQRA could be addressing concerns

¹ 2018 Environmental Monitoring Program, Resolute Bay Airport Land Treatment Unit, Cornwallis Island, Nunavut prepared by Stantec

related to the integrity of the liner, and the submission of a *Landfarm Integrity Assessment and Improvement Report* as required under Part E, Item 2 of the Licence No: 1BR-RLF2030, is not necessary at this time.

Should you have any questions, please feel free to contact the undersigned at (867) 360-6338 (extension 33) or ali.shaikh@nwb-oen.ca, at your earliest convenience.

A handwritten signature in blue ink, appearing to read 'mali', with a horizontal line underneath and two small dots below the line.

Mohammad Ali Shaikh
Nunavut Water Board,
Technical Advisor

Cc: Distribution List – Qikiqtani