



Nunavut Regional Office (NRO)
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February 19, 2014

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board
P.O. Box 119, Gjoa Haven,
Nunavut X0B 1J0

Dear Ms. Beaulieu,

**RE: Water Board Licence No. 1BR-STU1318
Amendment Request – CAM-A (Sturt Point) Site Remediation Project**

In reviewing the Water License for the CAM-A project, AANDC has realized that some conditions in the Licence no longer apply to this project. These conditions are:

1. Clause 16, Part D states that *“The licensee shall for the purposes of monitoring install groundwater monitoring wells, at least one up-gradient and two down-gradient of the Non-Hazardous Waste Landfill, the Landfarm Facility and any other areas of the Project site requiring monitoring”*.

AANDC and PWGSC recently re-evaluated the contamination on CAM-A site vis-a-vis the Remedial Action Plan (RAP) that was previously submitted for the project and concluded that, based on the quantity of contamination on the site, a walk-away solution, where-by all the contaminated media/material (except PHC Type B Soils) at the site are shipped to the south for disposal, would be a better option for CAM-A. Consequently, all non-hazardous wastes on CAM-A will no longer be disposed of in an on-site landfill but they will be packaged and disposed of-site in a landfill facility in southern Canada. Furthermore, the landfarm that will be constructed and operated on CAM-A, for the treatment of the will PHC Type B Soils, will be small and temporary in nature. The landfarm will be constructed in 2014 and will be used to treat approximately 430 m³ of Type B contaminated soil. It is expected that the landfarm will be in use for approximately 6 weeks at which time it will be decommissioned. Since no wastes or landfill will be left on site, there will not be any need for on-going monitoring after completion of remediation at CAM-A. Consequently there is no longer the need to install monitoring wells on the CAM-A site. We are, therefore, requesting the removal of the requirement to install monitoring wells at the CAM-A site.



2. Clause 2, Part E states that “The Licensee shall use aggregates for construction from approved sources that have been demonstrated to not possess acid generating and metal leaching properties”.

The Crown's consultant (AECOM) has provided a memorandum titled “CAM-A Sturt Point Borrow Source Geochemistry” (copy attached) to demonstrate that the potential for the granular material at CAM-A (Sturt Point) site to generate acid or leach metal are extremely low to non-existent. On the strength of this memo, we are requesting the removal of the requirement to complete sampling and analytical testing to demonstrate that the granular material within the borrow sources at the CAM-A are non-acid generating.

We would appreciate the Board's immediate action on this request so that we can have these amendments in place before we get to the site this year.

Should you have any questions or require further details concerning this request, please do not hesitate to contact the undersigned or the Project Manager, Dele Morakinyo at dele.morakinyo@aandc-aadnc.gc.ca, or by telephone at (819) 934-9224

Sincerely,

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