
Fwd: 1BR-THI1722 Amendment Application Inquiry

Richard Dwyer <richard.dwyer@nwb-oen.ca>
Draft To: Sergey Kuflevskiy <sergey.kuflevskiy@nwb-oen.ca>

Fri, Sep 27, 2019 at 11:59 AM

From: **Raquel Labranche** <rlabranche@qenv.ca>
Date: Fri, Sep 27, 2019 at 11:00 AM
Subject: RE: 1BR-THI1722 Amendment Application Inquiry
To: Sergey Kuflevskiy <sergey.kuflevskiy@nwb-oen.ca>
Cc: Jennifer Godin <jgodin@qenv.ca>

Hello Sergey,

As discussed, here are the updated documents along with the 2017 and 2018 annual reports.

Have a nice weekend!

Raquel Labranche, P. Eng.

Project Manager



Iqaluit & Montreal

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De : Sergey Kuflevskiy [mailto:sergey.kuflevskiy@nwb-oen.ca]

Envoyé : Tuesday, September 17, 2019 1:38 PM

À : Raquel Labranche

Cc : Jennifer Godin

Objet : Re: 1BR-THI1722 Amendment Application Inquiry

Sounds good.

I will wait for the updated documents before distributing the file for public review then. This way we will have a more complete package.

Cheers,

Thank you for submitting the compliance table Raquel,

When should we expect the Items Scheduled to be delivered in September as per the table provided? Just a note that for the Annual reports you can just fill out the NWB's generic Annual Report form.

Thank you,



On Tue, Sep 17, 2019 at 8:13 AM Raquel Labranche <rlabranche@qenv.ca> wrote:

Hello Serguey,

I have gone over your comments with Olivier and I have prepared this compliance table which I hope responds to all your points.

Please let me know if you would like further information or if you have any other recommendations or concerns.

Thank you,

Raquel Labranche, P. Eng.

Project Manager



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De : Sergey Kuflevskiy <sergey.kuflevskiy@nwb-oen.ca>

Envoyé : Wednesday, September 11, 2019 6:24 PM

À : Olivier Simard <osimard@qenv.ca>

Cc : Jennifer Godin <jgodin@qenv.ca>

Objet : Re: 1BR-THI1722 Amendment Application Inquiry

Hi Oliver,

I am the NWB Technical Advisor currently processing the Qikiqtaaluk Environmental's Amendment Application for Water Licence 1BR-TH11722. I just finished reviewing the files submitted with the application package and wanted to touch base and give you a few pointers.

In your original email dated July 16, 2019, you asked to *provide a licence specific direction* for the Compliance Assessment/ Status Report. You can just submit an Excel Spreadsheet outlining the status of compliance for all Licence conditions. Here is an example of such table:

Licence Condition		Status of Compliance	Short Term Plan for Compliance	Schedule for Implementation of Short Term Plan for Compliance	Long Term Plan for Compliance	Schedule for Implementation of Long Term Plan for Compliance
B - 1						
B-1.a						
B-1.b						
B-1.c						

Additionally, I noticed that the updated plans are still missing some information required by the Water Licence.

For example, the O&M Plan for the Soil Treatment Facility does not include ground water monitoring details, well locations, etc. (**Part G, Item 7** of the Licence). However, I noticed that this information is provided in the Environmental Protection Plan (section 3.1.5). So, you can either add a comment and reference it in the Compliance Assessment Report, or include the required information into the O&M Plan, or comment on when this will be addressed in the Schedule column.

Spill Contingency Plan does not address all the requirements of **Part H, Item 2** (i.e. spill on water, CIRNA contact info - yes, starting from this week they are CIRNA without "C", so you might address this as well).

Abandonment and Remediation Plan was supposed to include schedule of reclamation work as per **Part I, Item 1**.

Updated QA/QC Plan was supposed to be submitted within 3 months after the Licence issuance as per **Part J, Item 11**. However, I noticed that some information was incorporated into the EP Plan. So, maybe you can comment on that in the Compliance table.

Also, you indicated in the application that the 2017 and 2018 Annual Reports will be provided in August 2019 - make sure you address all the conditions required by the Licence, and in particular **Part B, Item 1g** - description of all progressive reclamation work undertaken, and **Part B, Item 1m** - discussion of the WTF best achievable treatment levels.

The 2017 Amendment of the Licence asked to implement measures to minimize erosion from discharge of effluent (**Part E, Item 4**). Please, address this as well.

Also, the CIRNA Inspector noted that the additional Soil Containment Area was constructed without following Part F of the Licence. I would like to remind you that the Construction Summary Report should be submitted within 90 days of construction completion as per **Part F, Item 5**. Again, there are As-build drawings in the O&M Plan. So, you can probably comment on that in the Compliance table as well.

Let me know if you have any questions.

You can reach me by phone at (867)360-6338 (extention 29) or by replying to this email.

Kind regards and looking forward to working with you,

