

1BR-THI1722 Amendment Application Inquiry

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

Wed, Jul 17, 2019 at 9:41 PM

To: osimard@qenv.ca

Cc: Richard Dwyer <richard.dwyer@nwb-oen.ca>

Hi Olivier,

I am the NWB Technical Advisor currently processing the Qikiqtaaluk Environmental's Amendment Application for Water Licence 1BR-THI1722. 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.

