File No: 1BR-THI2027

June 24, 2020

Raquel Labranche
Project Manager
Qikiqtaaluk Environmental Inc.
PO Box 2110 / 2027 Iqaluit Lane
Iqaluit, NU X0A 0H0

Email: rlabranche@qenv.ca Email: jgodin@qenv.ca

RE: NWB Technical Review of 2019 Annual Report for the Qikiqtaaluk Environmental Waste Processing Facility; Water Licence No: 1BR-THI2027

Jennifer Godin

Iqaluit, NU X0A 0H0

Qikiqtaaluk Environmental Inc.

PO Box 2110 / 2027 Igaluit Lane

Director

Dear Ms. Labranche and Ms. Godin:

The Nunavut Water Board (NWB or Board) has completed its technical review of the 2019 Annual Report (Report) provided to the Board on April 7, 2020. Following receipt, the Report was made available to the Qikiqtani distribution list for information. No comments have been received to date.

The technical review of the Report determined that the information provided generally addresses the requirements of the Water Licence. However, the NWB notes that the only monitoring data provided with the Report was for the monitoring station THI-1a. The Licensee is strongly advised to report all data required under Part J, Item 1 of the Water Licence in all future reports, or provide an explanation as to why this data was not collected.

Additionally, the NWB notes that the Licensee has not provided all submissions previously required by the Water Licence:

## • Part F, Item 5:

The Licensee shall provide to the Board, within ninety (90) days of completion of the construction of any dams, dykes or structures intended to contain, withhold, divert or retain Water or Waste, including facilities or systems for the storage, treatment and disposal of contaminated Waters, soils, and storage of Hazardous Wastes, design drawings and construction reports, including as-built drawings stamped by an Engineer, documentation of field decisions that deviate from original plans, and any data used to support these decisions.

The Board is of understanding that the additional lined watertight cell was constructed in June 2018 as an emergency measure. However, the Construction Summary Report for this structure has not been provided to the Board to date.

## • Part G, Item 7:

The Licensee shall submit updated versions of the Plans referred to in Part G, Items 5 ["Operations and Management Plan, Environmental Waste Processing Facility"] and 6 ["Environmental Protection Plan, Environmental Waste Processing Facility"] for Board review with the 2019 Annual Report to reflect the sampling strategy described in Part J, Item 1.

To date, the NWB has no record of receiving this information which was due on May 31, 2020.

## • Part I, Item 1a:

The Licensee shall submit with the 2019 Annual Report an addendum to the ["Abandonment and Restoration Plan, Environmental Waste Processing Facility, 2019 Amendment to 1BR-THI1722"] that includes schedule of reclamation work to be completed on the Hydrocarbon Impacted Water Treatment Facility (previous location) located at 63° 45' 44" N and 68° 32' 41" W, within the City of Iqaluit

To date, the NWB has no record of receiving this information, which was due on May 31, 2020.

## • Part J, Item 11:

The Licensee shall submit to the Board for approval, with the 2019 Annual Report, a Quality Assurance/ Quality Control Plan, approved by an Analyst, that includes requirements for independent third party sampling and analysis. This Plan shall be developed in accordance with the 1996 Quality Assurance (QA) and Quality Control (QC) Guidelines for Use by Class "A" (INAC).

To date, the NWB has no record of receiving this information, which was due on May 31, 2020.

The Licensee is requested to submit to the Board all outstanding information listed above, or an explanation as to why it was missing along with the timeline advising when these outstanding submissions will be provided to the NWB, within sixty (60) days from the issuance of this letter.

Should you have any questions, please feel free to contact the undersigned at (867) 360-6338 (extension 29) or <a href="mailto:sergey.kuflevskiy@nwb-oen.ca">sergey.kuflevskiy@nwb-oen.ca</a>, at your earliest convenience.

Sincerely,

Sergey Kuflevskiy Technical Advisor Nunavut Water Board,

Cc: Distribution List – Qikiqtani