

### TR: 1BR-THI1722 Amendment Application Inquiry

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

Wed, Aug 26, 2020 at 10:14 AM

To: Raquel Labranche <rlabranche@qenv.ca>

Cc: Jennifer Godin <igodin@genv.ca>, licensing licensing@nwb-oen.ca>

Hello Raquel,

Thank you for providing these clarifications and the updated O&M Manual. However, the following comments should still be addressed:

Part F, Item 5 is specifically talking about the Construction Summary Report, not just an insertion of an As-Built into the O&M Manual. The purpose of the construction design report is to prove to the interveners that the structure was designed in a way that is safe for the environment. Please provide this Design Report (and attach the updated O&M Manual to your submission) to the licencing (licensing@nwb-oen.ca) asap, since it will have to go for public review, where the public and interveners might ask questions.

**Part G, Item 7** was asking to update both the O&M Manual and the Environmental Protection Plan to reflect the correct Monitoring Station Description and labelling.

**Part I, Item 1a** is specifically asking about remediation activities on the abandoned facility (previous location) located at 63° 45' 44" N and 68° 32' 41" W. This was required under the previous water Licence, but was never provided to the Board. In your email, you are stating that no remediation activities are planned in the future. Please note that the abandoned location has to be remediated in any case. If this is not done, the company will have to face serious consequences with the Inspector. Please, confirm if what you said is true indeed and your company does not want to remediate their previous location (or if it has already been remediated). In this instance the NWB will have to contact the enforcement agency to deal with this issue.

Part J, Item 11 is asking for a stand alone QA/QC Plan, not just a section within the O&M Manual. Please provide this Plan to licensing (licensing@nwb-oen.ca) asap, as it will have to go for public review as well.

Thank you for understanding and looking forward to your response.



# Sergey Kuflevskiy- 296 dec979

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Hello Sergey,
Please see the points I have addressed below from the review:
Part F, Item 5:
The berm in 2018 was expanded and is already included in the as-built drawing we had added to the O&M.
Part G, Item 7:
More information on the sampling strategy from the License Part J, Item 1 has been added to the O&M (see attached)
Part I, Item 1a:
As stated in our compliance table, there is no reclamation work to be done.
Part J, Item 11:
The O&M was modified to reference the QAQC AANDC document.
And as addressed in our recent communications, we are looking to find a third party to follow our sampling campaign
I hope that this responds to the points in your review.
Thank you!
Raquel
De: Sergey Kuflevskiy [mailto:sergey.kuflevskiy@nwb-oen.ca] Envoyé: Monday, July 13, 2020 2:58 PM À: Raquel Labranche Cc: Jennifer Godin Objet: Re: 1BR-THI1722 Amendment Application Inquiry
Hi Raquel,
In the Letter, I quoted the sections of the Licence that had to be covered within the 2019 Annual Report submission. The Licence was issued with quite a few conditions.
Please refer to the Licence itself. In the Introductory sections, I have explained what needs to be submitted after the issuance of the Licence and why.
All items indicated in my Letter are still outstanding.

#### Sergey



## Sergey Kuflevskiy- パしム dペニペイト

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