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June 4, 2004

Mr. Scott Stewart
Indian and Northern Affairs Canada
Nunavut District Office
P.O. Box 100
Iqaluit, Nunavut
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Fax: 979-6445

Re: Action Plan Pertaining to North 40 Inspectors Direction – June 3, 2004

Dear Mr. Stewart:

We are in receipt of your direction dated June 3, 2004.

Immediate Actions

On June 3, 2004 upon receipt of the Inspectors Direction the City took the following actions:

- A. locked the gates to the North 40 Gravel Pit;
- B. faxed a copy of the Inspectors Direction with a fax letter informing the contractors that gravel extraction from the North 40 is to cease immediately for an indeterminate period;
- C. provided a copy of the fuel spill report in the North 40 to your office.

We believe we have complied with Items 1 and 4 of your direction as well as the first part of Item 2.

Interim Plan – Environmental Management

The direction given in the June 3, 2004 letter has effectively halted construction in Iqaluit. We are therefore proposing the following interim actions to accelerate the ability for granular materials to be taken from the North 40 this summer.

- A. Work with INAC to map out existing granular stockpiles in the North 40.
- B. Implement the following protocol to sample and test the existing stockpiles.
 - catalogue the existing stockpiles of granular material in the North 40;



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- collect one sample composed of a minimum of five composites for every 5,000 cubic meters of currently stockpiled material;
- as requested by INAC, these samples will be submitted for laboratory analysis of Total Petroleum Hydrocarbons (TPH);
- upon confirmation that each stockpile does not have concentrations of TPH above the applicable guidelines, the stockpiles material can be hauled off-site for use in the City.

- C. The excavation and processing of raw granular material will not be permitted either below the existing water line, or in areas of gross metal debris.
- D. Additional granular material which is excavated and processed in the North 40 will not be allowed to leave the Site until samples have been collected following the above protocol and the analytical results for TPH have been shown to be below the applicable guidelines.
- E. This protocol will be incorporated in to our existing Quarry Management Plan.

Abandonment and Restoration Plan

We are currently sourcing a consultant who has experience with the preparation of Abandonment and Restoration Plans in Nunavut. To date we have been unable to locate a consultant with this experience in Nunavut. The Nunavut Water Board has been requested to provide assistance with identifying an experienced consultant.

The City has also scanned the Nunavut Water Board Web Site but we have been unable to find an existing Abandonment and Restoration Plan for an existing or proposed quarry and/or waste disposal site which could be used as a template. We therefore propose the following:

- A. Due to the apparent absence of a guidance document or other template, we propose to prepare a draft Table of Contents for the Abandonment and Restoration plan to ensure we will be addressing all issues required by INAC. This will be submitted to INAC for review.
- B. Upon approval of the Table of Contents by INAC, the City will proceed with the preparation of an Abandonment and Restoration Plan for the North 40. A draft of this report will be submitted to INAC for review and comment prior to submission to the Nunavut Water Board.

We would like to take this opportunity to point out that while the City collects royalties from the extraction of granular material from the North 40, these monies should be adequate to implement restoration activities required from the removal of granular materials, however the monies will likely not be sufficient to address the long term disposal or encapsulation of metal debris currently located at the Site. The City will be contacting the Federal Contaminants Department to discuss funding for the removal, disposal, and/or encapsulation of the metal debris in the North 40.



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Site Drainage

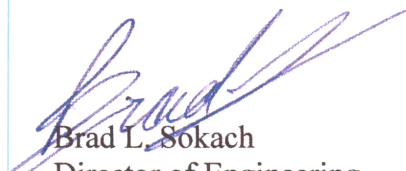
Currently an earthen berm exists at the north end of the North 40 site. The berm diverts water, flowing down a stream from the surrounding hills, to a drainage ditch which runs along the east boundary of the North 40. The berm appears to be in good condition and is continuing to divert away from the North 40. In general, the drainage ditch is also working well. There may be sections of the drainage ditch which are overflowing during spring runoff. These sections will be restored this summer.


There is surface water flow through the North 40 throughout the summer. The water likely is from the continuing thawing of frost, ice and snow at the site. The City is proposing to develop a drainage plan for the Site to collect the water through the summer in one area. This water would periodically be pumped to settling lagoons to reduce the suspended matter prior to discharge to an existing drainage structure. This approach should eliminate the uncontrolled discharge of water from the site and allow controls to be developed should a spill of some nature develop.

Closing

We believe the above approach will address the concerns identified by INAC. We request that INAC review this approach and respond to the City with comments as soon as possible. We feel the approach proposed above will allow construction to proceed in the summer of 2004 with adequate assurance that hydrocarbon contaminated soil is not being used in the City.

Regards,


Brad L. Sokach
Director of Engineering
City of Iqaluit


Dave St. Louis
Acting Chief Administrative Officer
City of Iqaluit.

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