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**Brad Sokach
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City of Iqaluit
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June 15, 2004

Re: Clarification of Requirements for the Inspectors Direction of June 3, 2004 .

Dear Mr. Sokach

I apologise for the late response to your letter but I have been unexpectedly out of the office since Thursday June 10, 2004. I think perhaps you misunderstood me at the meeting held on June 4, 2004. I will attempt to resolve any confusion my comments may have caused.

Your letter to this office titled **Response to INAC letter dated June 8, 2004** suggests that extraction or processing of granular material would be allowed to begin once an Environmental Management Plan had been submitted and reviewed by INAC. This is incorrect.

In our discussion on June 4, 2004 I wanted to let the City know that the environmental component of a Quarry Management Plan would be *an important part* of an Abandonment and Restoration Plan for the North 40 dump site. Obviously, if gravel extraction is going to continue in the North 40 this will affect the Abandonment and Restoration options for the site as A&R for the site is tightly bound to the land use. I thought that pointing this out to the City would save them some work by allowing them to develop the environmental component of a quarry management plan and essentially plug it in to the A&R plan for the North 40 Dump. I apologise for any confusion this may have caused. To clarify;

Provision of the Environmental Component of a Quarry Management plan and the first draft of an A&R Plan for the North 40 Metal Dump will allow for the removal of previously stockpiled material that has been sampled and revealed to be safe for use in the community.

Prior to any further gravel extraction in the North 40, the Abandonment and Restoration Plan must be implemented (or if you wish, the site must be restored) to the satisfaction of INAC and the NWB.

I have verbally told the City's representatives on more than one occasion that diversion of Carney Creek and control of surface water at the site would be a big step toward continued gravel extraction in the area. I did not say in the letter that the approved A&R plan needed to be completed before extraction could begin. If I had, it would be years before gravel extraction could continue. In my attempt to give the City some leeway I caused confusion. I will be more careful not to do so in the future.

Petroleum Hydrocarbon Contamination

I did not realise the City had initiated the collection of soil samples from stockpiles in the North 40 on June 9, 2004. I thought I made it clear that I wanted to be present during sampling. With respect to the sampling protocol, I received new information that caused a modification of the sampling requirements. It is unfortunate that the information was not provided sooner but unavoidable.

The City did not provide information on the sampling protocol to be used i.e. systematic, random, judgmental, this information needs to be provided to show that the City is sampling in a concise and reproducible manner. It was the opinion of the Contaminants division of INAC that discrete samples would better reveal hotspots of contamination as opposed to potentially diluted composite samples. That is the reason for the change in requirements.

To remove any confusion or ambiguity the City should follow the latest contaminated soil guidelines developed by the Canadian Council of Ministers of the Environment entitled, Canada-Wide Standards for Petroleum Hydrocarbons (PHC) in Soil.

I would like to point out that the City has had since March 11, 2004 to comply with the requests of this office. It is not INAC alone that is responsible for the hold up of construction in Iqaluit.

In terms of Guidance for an A&R plan the only information I have received from the NWB is the Contaminated Site Remediation Guideline I forwarded to your office. If further information is provided I will pass it along but I would suggest that the City perhaps look outside Nunavut for potential A&R options.

If you have any questions or concerns please contact me.

Sincerely,

Scott Stewart

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Environment Canada - Iqaluit (Sid Bruinsma)
Environment Canada - Yellowknife (Anne Wilson)
Fisheries and Oceans - Iqaluit (Keith Pelley)