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Winnipeg, MB R3C 0P6

Your file Votre référence
1BR-LTU 1419 Transport Canada

Our file Notre référence
7184-90-46

May 06, 2015

Nunavut Water Board
P.O Box 119
Gjoa Haven, NU X0B 1J0

Attention: Cynthia Ene, Technical Advisor

**Re: Request for Additional Information – Type B water licence cancellation application
1BR-LTU 1419 Transport Canada**

Transport Canada has reviewed your email of March 24, 2015 requesting that we provide a response to the question posed by AANDC's Water Resources Division: *Following the cancellation of Transport Canada's License who is responsible for these Hydrocarbon Contaminated soils?*

The contaminated soils that were removed from the Transport Canada land treatment units (LTUs) at the Iqaluit Airport are located in a containment cell owned and operated by the Government of Nunavut (GN). As per the attached email, the Government of Nunavut has directed the Airport Improvement Ltd Partnership (AILP) to include the management of the contaminated soils from Transport Canada's licensed LTUs as a condition of the Water License for the Iqaluit International Airport Improvement Project. It is our understanding that the application for the referenced water license has been provided to the Nunavut Water Board.

Based upon the response from the GN dated April 24, 2015, it is Transport Canada's position that the Government of Nunavut and AILP will be responsible for the hydrocarbon contaminated soils following the cancellation of Transport Canada's water license.

Should you require any additional information please feel free to contact the undersigned at (204) 983-3388.

Regards,

Anita Gudmundson
A/Manager, Environmental Services

Encl.

Canada

Champagne Gudmundson, Anita

From: Hawkins, John [JHawkins@GOV.NU.CA]
Sent: Friday, April 24, 2015 2:15 PM
To: Kirkland, Dale
Cc: Stevens, Jim; Champagne Gudmundson, Anita; Frederickson, Todd
Subject: RE: TC NWB Water License - cancellation process - response to comment period

Categories: TO DO

Hello Dale,

The GN is committed to ensuring these contaminated soils are properly remediated in an approved, licenced manner. Accordingly, we have directed AILP to include management of the contaminated soils from Transport Canada's licenced LTUs as a condition of the Water Licence for the Iqaluit International Airport Improvement Project.

The soils will be maintained in a monitored containment cell for the duration of the construction, following which they will be remediated to the standard applicable for industrial sites.

AILP has submitted their Water licence application to the Nunavut Water Board; the application contains the following relevant text:

The Contaminated soils formerly contained in the Transport Canada LTUs will be treated in an engineered, licenced LTU until they are no longer deemed contaminated. This soil remediation will be undertaken in a manner that does not unduly interfere with the construction of the IIAIP. Soils will remain in the temporary containment cell until they can be treated in a licenced LTU. Options for the licenced LTU include ones off the airport site, a new onsite LTU specifically engineered and licenced to treat contaminated soils from the airport site, or an engineered modification of the Containment Cell to allow remediation. Details of the remediation plan and engineered drawings will be presented to the NWB for consideration and approval prior to any remediation works being undertaken. In any case the remediation will commence no later than the summer of 2018.

- F. As requested, a Long-Term Monitoring Plan has been drafted for this undertaking which is included in Appendix E of the SGMP (*Long-Term Monitoring Plan*).**

The Soil and Groundwater Management Plan (SGMP) addresses the LTU materials as follows:

2.4.2 Section 5.2 – LTUs and Underlying Soil

As mentioned in Sections 1.2 and 2.2 the contaminated soil from the LTUs and the underlying soil were transferred into a containment cell. These soils will remain in place until 2018, after which the containment cell will be converted into a landfarm. Plans and specifications, signed by an engineer registered in Nunavut, to convert the containment cell into a landfarm will be submitted to the Nunavut Water Board for approval in 2017. These plans will also include the possibility of the construction of new or additional landfarm areas inside, or outside of the fenced airport property, as long as the city zoning by-laws are respected. It is anticipated that the treatment of soil will start by June 2018. The soil will be treated in layers of 50 cm. The current plan is to remove the covering membrane and sample the first 50 cm of soil to determine the level of contamination. Should the soils meet the guideline levels, then it will be removed and used as fill at a pre-approved location. Should the soils not respect the guideline values, then an amendment will be added to accelerate the treatment process, and the soils will be tilled. The amount and type of amendment and the frequency of the tilling will be based on the level of contamination. Once the soil respects the guideline values, then the 50 cm layer will be removed and the treatment process will restart on the next 50 cm layer until all of the soils have been treated. It is expected that all soils will be treated by fall 2023.

Milestones:

- Send Landfarm Treatment Unit engineering and monitoring plans, specifications, abandonment and reclamation plans to the NWB with Licence amendment for Fall 2017;
- LTU construction in the summer of 2018;
- LTU reclamation initiated in 2018 with groundwater monitoring; and
- LTU soils reclamation completed by 2023 (if no adverse conditions or situations encountered).

The SGMP also includes a Long-Term Monitoring Plan including visual inspections and monitoring well sampling. My apologies for the delay in getting this to you, and I hope this is acceptable to AANDC and the NWB.

Regards,
John



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Building Nunavut Together
Nunavut iluqatigiingniq
Bâtir le Nunavut ensemble

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John S. Hawkins
Director of Iqaluit Airport
Department of Economic
Development & Transportation

John S. Hawkins
Aulapkaiki Iqalungni Milviliqinirmut
Pivalliyuliyiikkut
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Government of Nunavut

ᐅ(867) 975-7771

jhawkins@gov.nu.ca

From: Kirkland, Dale [<mailto:Dale.Kirkland@tc.gc.ca>]
Sent: April 14, 2015 4:58 PM
To: Stevens, Jim
Cc: Champagne Gudmundson, Anita; Frederickson, Todd
Subject: TC NWB Water License - cancellation process - response to comment period

Hi Jim,

As you are aware, Transport Canada has applied to cancel our Nunavut Water Board water license (1BR-LTU1419) for the Land Treatment Unit Project. As part of the application process, the Nunavut Water Board held a 30 day comment period which resulted in one question directed to Transport Canada.

The question from AANDC was "Following the cancellation of Transport Canada's License who is responsible for these Hydrocarbon Contaminated soils?". This is in reference to the soils that were removed from the Transport Canada land treatment units and is now contained within a retention cell owned and operated by the Government of Nunavut.

In order to support our response to the Nunavut Water Board and AANDC, could you please confirm that the Government of Nunavut holds responsibility for the hydrocarbon contaminated soils that were removed from the Transport Canada land treatment units and is now contained within a retention cell owned and operated by the Government of Nunavut. In addition, can you please confirm that this responsibility will remain once Transport Canada's Nunavut Water Board water license is cancelled. Once we have your confirmation, we will send a response to the Nunavut Water Board.

Please feel free to contact me should you wish to discuss.

Thanks Jim,

Dale

Dale Kirkland

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