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NUNAVUT WATER BOARD  
NUNAVUT IMALIRIYIN KATIMAYINGI  
OFFICE DES EAUX DU NUNAVUT

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File: **1BR-LTU1013/TR/ B2, E1, E3, H1, I1, J10**

October 22, 2010

Michael Molinski, Environment Officer  
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**Subject: Licence No. 1BR-LTU1013 “Iqaluit Airport Project”, Qikiqtani Region,  
Nunavut, Transport Canada – Environmental Affairs, Programs;  
Technical Review of submitted Report and Plans**

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Dear Mr. Molinski;

The Nunavut Water Board (“NWB”) received the following documents from Transport Canada, Environmental Affairs on July 12, 2010, submitted under Licence No. 1BR-LTU1013.

- a. **2009 Annual Report** (received on July 12, 2010) under Part B, Item 2;
- b. **“Iqaluit Airport Land Treatment Units(LTUs) As-built inspection results (LTU C and LTU D)”**, (June 4, 2010) under Part E, Item 1;
- c. **“Addendum to Operations and Maintenance Plan”**(July 12, 2010) under Part E, Item 3;
- d. **“Spill Contingency Plan”** (July 12, 2010) under Part H, Item 1;
- e. **“Stand Alone Abandonment and Restoration Plan”** (July,12, 2010) under Part I, Item 1; and
- f. **“QA/QC Plan”** (July 12, 2010) under Part J, Item 10

These submissions were distributed to the interested parties for comments on September 17, 2010. Comments were received from Environment Canada (EC) on October 15, 2010. These comments are available at the NWB FTP site: <ftp://nunavutwaterboard.org>. NWB has completed a technical review of the submitted documents.

### **2009 Annual Report**

The 2009 Annual Report was submitted under Part B, Item 2 of the Licence. No comments were

received from interested persons for this report. The report is found to be meeting the reporting requirements of the licence. However, an annual report form should be used for the future submissions. This form is available on the NWB FTP site.

### **Iqaluit Airport Land Treatment Units (LTUs) As-built inspection results (LTU C and D)**

This document was submitted on June 4, 2010. The submission is found to be meeting the reporting requirements of the licence.

### **Addendum to Operations and Maintenance Plan**

No comments were received from interested parties for the Addendum to the Operations and Maintenance Plan. The Plan is also found to be meeting generally the reporting requirements of the licence. However, NWB notes that as stated in Part E, Item 3 the Addendum shall

1. include the approved Quality Assurance Quality Control Plan required under Part J, Item 10.

The Quality Assurance Quality Control (QA/QC) Plan shall be approved by an accredited laboratory.

### **Spill Contingency Plan**

No major concerns with the Spill Contingency Plan were stated by EC at this time. It was noted however, that all spills are to be documented and reported to the NWT-NU 24 hour Spill Line at (867) 920-8130. EC stated also that comments previously submitted on behalf of EC by C. Spagnuolo on June 30, 2006 would still apply to this project.

NWB reviewed the document entitled “NWB Water License Number: 1BR-LTU0608, Part H: Spill Contingency Plan” (Plan). NWB notes that Part H, Item 1 of the licence states:

The Board acknowledges receipt of the Plan entitled “NWB Water License Number: 1BR-LTU0608, Part H: Spill Contingency Plan” undated and received on June 26, 2009. The Plan, although containing basic information, is lacking specific components of a plan acceptable to the Board. The Licensee shall therefore submit to the Board for approval, within sixty (60) days of issuance of the Licence, a revised Spill Contingency Plan, developed in the format set out by the Consolidation of Spill Contingency Planning and Reporting Regulations R-068-93, and address comments received during the application review process. In addition to addressing products to be stored, the procedures for the prevention, monitoring, detection, containment and cleanup of potential failures from the Land Treatment Unit containment structures shall also be included.

It was noted that the content of this plan is completely the same as the content of the Plan previously submitted on June 26, 2009, which was not approved by the Board. An approval of the plan as submitted will be withheld and the Licensee is requested to revise the plan and re-submit for approval within sixty (60) days of the date of this letter, taking into consideration the

comments received during the application review process. The procedures for the prevention, detection, containment and clean-up of potential spills shall also be included with the Plan.

### **Stand Alone Abandonment and Restoration Plan**

EC stated that it has no major concerns with Abandonment and Restoration Plan (Plan) at this time. The NWB reviewed the Plan and identified some items that should be addressed by the Licensee. Part I. Item 1 of the current licence states:

The Licensee shall submit to the Board for approval in writing, within sixty (60) days of issuance of this Licence, a standalone Abandonment and Restoration Plan, for the licensed facilities and include or address the following:

- a. Pre-amble with effective period, project name, location description, reference to maps and regulatory instruments in place;
- b. Introduction with descriptions of the project area, scope of the plan and when seasonal or final abandonment will be implemented;
- c. Schedule with estimated time frame for carrying out the plan; and
- d. Project infrastructure including seasonal and final abandonment and restoration procedures for the project components.

No information is provided by the Licensee about the effective period of the project. No drawings indicating the location of site characteristics and infrastructure or reference to maps are included with Plan. No schedule with estimated time frame for carrying out the Plan is provided. It is my understanding that the detailed project schedule that will outline the time frames for each associated project work activity should be submitted by the contractor when a contract is awarded.

As this information is a required minimum of the plan, Board approval has not been granted at this time. All above noted items shall be included in a revised Plan, to be submitted within sixty (60) days of the date of this letter.

### **QA/QC Plan**

No comments were received from interested parties for this Plan. However, under the terms of the current licence this plan is to be approved as stated in Part J, Item 10 of the licence:

The Plan shall include up to date sampling methods to all applicable standards, acceptable to an accredited laboratory as required by Part J, Item 8 and Part J, Item 9. The Plan shall include a covering letter from the accredited laboratory, confirming acceptance of the Plan for analyses to be performed under this Licence.

An approval letter from an accredited laboratory shall be included with the Plan. The Licensee is requested to provide the NWB with a copy of the approval letter.

Should you have any questions, please feel free to contact the undersigned at (867) 360-6338 (ext. 30) or [k.kharatyan@nunavutwaterboard.org](mailto:k.kharatyan@nunavutwaterboard.org), at your earliest convenience.

Yours truly,

*Original signed by:*

Karén Kharatyan  
Technical Advisor

cc: Distribution List – Qikiqtani