

From: [Karen Kharatyan](#)
To: [Phyllis Beaulieu](#)
Subject: FW: 1BR-LTU1013 requirement for approved QAQC Plan
Date: Wednesday, November 03, 2010 2:08:48 PM

For the green file

Karen Kharatyan, Ph.D
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From: Molinski, Michael [<mailto:Michael.Molinski@tc.gc.ca>]
Sent: Wednesday, November 03, 2010 1:47 PM
To: 'k.kharatyan@nunavutwaterboard.org'
Subject: RE: 1BR-LTU1013 requirement for approved QAQC Plan

Ok, thanks.

I have revised the spill plan and have INAC (David Abernathy) currently reviewing it prior to submitting it to NWB. Once I have the comments I will mail it to you due to the size of the file (likely next week).

Thanks again,

Mike

From: Karen Kharatyan [<mailto:k.kharatyan@nunavutwaterboard.org>]
Sent: Wednesday, November 03, 2010 2:16 PM
To: Molinski, Michael
Subject: RE: 1BR-LTU1013 requirement for approved QAQC Plan

Hello Mike,

For annual reporting you could send us a letter indicating that no work was completed in 2010.

I understand that a certified lab will be used when the contractor is selected for the work. I think we can wait for QA/QC Plan until the beginning of the work. So it is recommended to provide us the Plan when your contractor is ready to start the work.

I understand why you cannot provide an effective period of project and schedule timeframes. If an estimated timeframe is provided, the Board shall be probable able to approve the Plan with a condition that the timeframes would adapt to the factors affecting the clean-up schedule. However, you are also advised to take into considerations the comments of EC as well as of INAC, which are available at NWB FTP site before submitting the revised Stand Alone Abandonment and Restoration Plan.

I'd like to remind you that the Spill Contingency Plan should also be revised for Board approval.

Regards,

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From: Molinski, Michael [mailto:Michael.Molinski@tc.gc.ca]
Sent: Wednesday, November 03, 2010 7:43 AM
To: Phyllis Beaulieu
Cc: 'k.kharatyan@nunavutwaterboard.org'
Subject: RE: 1BR-LTU1013 requirement for approved QAQC Plan

Hello Phyllis,

The letter from a certified lab was not included due to a problem we are facing. TC can not sole source a lab for our projects. TC (all federal departments) is obligated to tender projects for contractors to bid on. We evaluate the proposals and award the contract. The winning contractor is required to identify the certified lab they will be using. Each time we award a project a different lab will likely be used. As mentioned in a previous e-mail, we tendered the project and had 2 bidders. TC evaluated the proposals, both contractors failed. Therefore, the project to complete maintenance on the LTU (turn, fertilize and sample) was cancelled. If we did get samples this year we could have asked the lab for a letter, however, no work was completed so we could not get a letter from a lab. All of our projects require the contractor to follow the CCME Guidelines for Soil Sampling (as mentioned in the QA/QC Plan). Typically, a TC Environment Officer is on site to supervise the sampling program to ensure this is the case. I believe any certified lab will approve a QA/QC program governed by the CCME Guidelines.

So the question remains, what will satisfy this requirement for a letter? Also, the 2010 annual report will need to be submitted soon. Since no work was completed what would you like to see for this report?

On a separate note regarding the NWB review letter (attached):

1) Stand Alone Abandonment and Restoration Plan

The comments here indicated TC did not provide effective period of the project and no schedule estimated time frames. This was not missed information but nearly impossible to estimate due to contamination levels, the location of the site, weather conditions, length of winters and uncontrolled issues as described above where we could not complete the maintenance this year. I could give an estimate time frame for the reporting requirements, however, it would simply be a guess and could not be defended how this number was derived. What would you like to see for this?

Regards,

Mike

From: Phyllis Beaulieu [mailto:licensing@nunavutwaterboard.org]

Sent: Tuesday, October 12, 2010 5:08 PM

To: Molinski, Michael

Subject: 1BR-LTU1013 requirement for approved QAQC Plan

See attached letter regarding your submission of a Quality Assurance, Quality Control Plan.

Regards,

Phyllis Beaulieu

Manager of Licensing

Nunavut Water Board

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