

P.O. Box 119 GJOA HAVEN, NU XOB 1J0 TEL: (867) 360-6338 FAX: (867) 360-6369 」。 ΔL C へ ト G DL ト M NUNAVUT IMALIRIYIN KATIMAYINGI NUNAVUT WATER BOARD NUNAVUT IMALIRIYIN KATIMAYINGI

File: 3BM-WHA0207

Mar. 6, 2007

Kevin Hodgins Principal FSC Architects & Engineers 4910-53<sup>rd</sup> St., P.O. Box 1777 Yellowknife, NT X1A 2P4

E-mail: Kevin@fsc.ca

Subject: Amendment Application for a Landfarm Facility in Whale Cove

Dear Mr. Hodgins,

The NWB received a resubmission for the above file via e-mail from FSC on Feb. 27, 2007, which responded to the NWB comment letter dated Aug. 24, 2006. The resubmission includes the application form, the questionnaire, and the landfarm location map. After a review of the resubmission package, the NWB requires further clarification.

- 1. The application form was signed by Ron Kent of FSC, but not dated. The attached questionnaire was revised, but still dated May 24, 2006. The Proponent is to clarify.
- 2. The landfarm location is not clearly indicated in the map provided. The NWB requests detailed map(s) of an appropriate scale for the landfarm location.
- 3. No engineering drawings are attached in this resubmission. Does the Proponent believe that the engineering drawing provided in the previous submission looks like <u>a "standard" landfarm drawing</u>, not a site specific one? In addition, there are not signature and stamp of a qualified engineer in the drawing. The Propone is to provide the updated landfarm design drawings.
- 4. The resubmission chose the option of <u>volatilization in an unlined storage area</u>, This is a drawback from the lined storage area in the previous submission. In addition, it appears that there is no sump for the landfarm. Does the Proponent believe that the EC Landfarming Information attached to the NWB comment letter dated August 24, 2006 provides "assistance in preparing the additional information requested by the NWB"? The NWB requests detailed explanation for the change.
- 5. There is not an Operation and Maintenance manual available. There is not a contingency plan, either. The monitoring program is outlined, but more details are required, such as site-specific monitoring locations, sampling protocol and measured parameters. The Proponent is to provide them for NWB review.



P.O. Box 119 GJOA HAVEN, NU X0B 1J0 TEL: (867) 360-6338 FAX: (867) 360-6369 בה ל בה ל החבר הוא אבו האינות ביי החבר הוא אינו ווא אבו האינות ביי הוא אינות ביי האינות ביי היי האינות ביי ה

- 6. The application indicates that 1420 m³ of soils identified as hydrocarbon contaminated are to be excavated from the tank farm, but the storage area will only be 10m×10m×1.5m. The capacity (up to 150 m³ if 1.5 m of depth is acceptable for landfarming) is consistent with the number (100 m³ of diesel contaminated soil) in page 2 of the application form. The Proponent is to clarify the inconsistency and other details (the amount of contaminated soils and the landfarming capacity).
- 7. The landfarm construction was scheduled to start in summer 2006. The NWB would like to know the current project status.

Please do not hesitate to contact the undersigned with any comments with regards to the foregoing at (867) 360-6338 ext.27 or tech4@nunavutwaterboard.org.

Sincerely,

Original signed by

Zhong Liu, MASc., MBA, MSc. Technical Advisor

cc: Phyllis Beaulieu, NWB, <u>licensing@nunavutwaterboard.org</u>
Clayton Croucher, Hamlet of Whale Cove, <u>saowc@qiniq.com</u>
Brian Duguay, GN/CGS, bduguay@gov.nu.ca