



Mary River Project - Modification No. 8 WRF Pond - Response to Comments

Assol Kubeisinova <assol.kubeisinova@nwb-oen.ca>

Thu, Sep 6, 2018 at 2:50 PM


To: Fai Ndofor <FNdofor@qia.ca>

Cc: Ida Porter <ida.porter@nwb-oen.ca>, Licensing Department <licensing@nwb-oen.ca>, SJoseph@qia.ca, "Forte, Sarah (AADNC/AANDC)" <sarah.forte@canada.ca>, "Parsons, Ian (AADNC/AANDC)" <ian.parsons@canada.ca>, JKunuk@qia.ca

Good afternoon Fai,

Thanks for providing your response. Please find my comments in maroon below.

Regards,

Assol Kubeisinoва- 

Technical Advisor - Conseiller technique ᐱᓕᑦᑐᒃᑐᔭᑦ ᐅᑲᑦᑎ-
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NUNAVUT WATER BOARD - OFFICE DES EAUX DU NUNAVUT
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www.nwb-oen.ca

P.O. Box 119
Gjøa Haven, NU X0B 1J0

C.P. 119
Gjoa Haven, NU X0B 1J0

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የሥራ ምርት ዓመታት X013 110

Titigaqavua 119
Uqhuqtuq, NU, X0B 1J0

Tel / Téléphone / yʔ/s]b / Hivayauta: (867) 360-6338 | Fax / Télécopieur / hvJ4f3 / Fax-kut: (867) 360-6369
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On Thu, Sep 6, 2018 at 11:31 AM Fai Ndofor <FNdofor@gia.ca> wrote:

Hello Assol.

Thanks for giving us the opportunity to confirm if the concerns QIA expressed with respect to Baffinland's Modification Request #8 were addressed in their response to interveners' comments.

QIA is concerned with the following responses:

1. QIA-ID8: QIA would like to ensure that it is necessary for the relevant requirements in Section 3 of the CDA Dam Safety Guidelines to be included in the OMS manual. **Thank you, NWB understands your position.**
2. QIA-ID9: QIA is seeking NWB clarification if construction QA/QC specifications are the sole responsibility of Baffinland to commission and implement, and are not a requirement of the Type A Water Licence 2AM-MRY1325 or the Commercial Lease Q13C301. QIA and Baffinland have recently approved an operational plan

for As-Built required by the Commercial Production Lease. This includes quality assurance testing results and validating these results with construction/design requirements to ensure performance of the infrastructure or facilities. This indicates that QA/QC construction specifications would be provided in a For Construction report to ensure appropriate QA/QC is performed to be detailed in the As-Built. The same logic could be applied to Schedule D. 1. J) of the Water Licence that requires data collected from instrumentation used to monitor earthworks and the interpretation of that data. Does the NWB share the same understanding? Additionally, can NWB provide further guidance on the requirements of construction specifications for modification requests?

The QA/QC specifications of the geomembrane are part of the final design that is required by Licence Part D, Item 2, and, therefore, are part of the documentation required for review provided these specifications are submitted to comply with the above-mentioned Licence condition. While reviewing design documentation under D2, the Board doesn't question the engineering specifics, but looks at the information such as the design rationale, requirements, criteria, construction methods and procedures outlining how infrastructure will be put in place, including quality assurance and quality control measures and equipment to be used, etc. BIMC indicated in their modification request filed on June 26, 2018, that they would like to commence construction in 60 days after the request, so it is reasonable to conclude that all documentation filed as part of the request for a modification must comply with the conditions set out in Part D. Does QIA have any questions to BIMC in regards to the contents of the QA/QC specifications in question?

Could QIA please clarify on the point of "Schedule D.1.J", as such an item is not present in the Licence? In addition, please note that NWB is not in the position to comment on or enforce any conditions of the Commercial Production Lease.

1. QIA-ID11: QIA acknowledges Baffinland is providing one of the two documents requested. In addition, QIA is seeking NWB guidance on whether referenced design documents that relate to the design in question should be considered for review. Baffinland is of the opinion that they should not be.

The referenced documents, if submitted to comply with Licence Part D, Item 2, are up for a review. Does QIA have any questions to BIMC in regards to the contents of the documents in question?

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7 attachments

