



NWB Tools

Richard Dwyer <richard.dwyer@nwb-oen.ca>

ECCC Eureka HAWS Regulatory Project - Planned site activities for the Landfarm project this fiscal year (8BC-EUR2131)

Karén Kharatyan <karen.kharatyan@nwb-oen.ca>

Fri, Nov 24, 2023 at 1:11 PM

To: "Cloutier-Dussault, Jean-Philippe (ECCC)" <Jean-Philippe.Cloutier-Dussault@ec.gc.ca>, licensing <licensing@nwb-oen.ca>

Cc: "Huguet, Tyler" <tyler.huguet@aecom.com>, "Baker, Nadia" <Nadia.Baker@aecom.com>, "Walker6, Julie (SPAC/PSPC)" <Julie.Walker6@tpsgc-pwgsc.gc.ca>

Hi Jean-Philippe,

Thank you for these responses, much appreciated.

One follow-up comment or clarification regarding your response to Item 4, stating that ECCC has not yet formally initiated this amendment request with NWB for Site-Specific Target Levels. Hopefully, the ECCC is aware and understands that there is unfortunately no mechanism to amend the type of licence from a Type "A" to a Type "B". Therefore, once this licence becomes a Type "A" licence any future amendments to licence will require a Type "A" licensing process which is relatively time and resource consuming than an amendment to a Type "B" licence.

Thanks again,



Karén Kharatyan, Ph. D- ԵՂԸԻ ԵՏՈՂԸԻ

Director Technical Services - Directeur des services technique ຈັງຫວັດ
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KATIMAYINGI

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

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

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ጋራ ጥጋጭ, ጠባቂ X0B 1J0

Titigaqavua 119
Uqhuqtuuq, NU, X0B 1J0

Tel / Téléphone / ᐅᐅᐅᐅ / Hivayauta: (867) 360-6338 | Fax / Télécopieur / ᐅᐅᐅᐅ / Fax-kut: (867) 360-6369
Toll Free / Sans / ᐅᐅᐅᐅᐅᐅᐅᐅ / Akiittuq: 1-855-521-3745

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On Fri, Nov 24, 2023 at 12:20 PM Cloutier-Dussault, Jean-Philippe (ECCC) <Jean-Philippe.Cloutier-Dussault@ec.gc.ca> wrote:

Good day Karén,

Please see below the answer to your questions. Have a good weekend. Best regards,

1. a) At which stage we are with the construction of Landfarm stated in your email above?

The construction of the new landfarm has not yet commenced. The activities as described in the email were not initiated as anticipated. Equipment and materials have been sealifted to site, and construction is expected to begin in June 2024.

b) Whether this will be a Landfarm to replace the existing/previous landfarm or an additional Landfarm?

To clarify, this is regarding a new landfarm (not yet constructed), which is in addition to an existing, no longer active, landfarm. The new landfarm will be used to treat impacted soils that will be removed from the existing landfarm as result of constructing the new raw water reservoir within a portion of its footprint.

c) I am trying to understand the Landfarm situation generally at site as the document "Eureka Sampling Procedure Standard Operating Procedure Water and Sewage Sampling" that was part of amendment application also states for Effluent discharge from Landfarm: "Collection of sample not performed due to construction of the New Water Lagoon at this location".

This statement from the Standard Operating Procedure (SOP) regarding sample collection is incorrect and will be updated in the SOP and the 2024 Annual Report. This statement should read that ECCC maintains and monitors all of the Monitoring Program Stations listed in Part I, Item 1 of the Water Licence and conducts sampling during periods of observed flow. However, there have been no runoff events (precipitation or snow melt events) during the construction seasons at EUR-4 to date. Summers at Eureka are generally very dry.

Further context / description of the landfarm / impacted soils generally at the site

A new landfarm with a total capacity of 10,000m³ is scheduled to be constructed in 2024 and 2025 to treat hydrocarbon impacted soils that have been identified in various locations throughout the Eureka High Arctic Weather Station Project Site.

One of the areas containing impacted soils is the existing landfarm, which was originally permitted over 10 years ago, and is no longer active (i.e., it is no longer used for treating impacted soils). Therefore, it is more accurate at this time to refer to the existing landfarm as an 'area containing impacted soils', rather than a landfarm.

The new raw water reservoir footprint overlaps with this area, thereby necessitating that material excavated from this area as part of the raw water reservoir construction be treated or disposed of appropriately. In our case, we intend to treat this material in the new landfarm once constructed.

In order to allow reservoir construction to proceed ahead of the completion of the landfarm construction, two 'temporary contaminated soils storage areas' were permitted and constructed to temporarily store this material that was excavated from the reservoir footprint. Once the new landfarm is constructed, the material from these temporary storage areas will be moved to the new landfarm for treatment.

There will be some impacted material within/surrounding the existing landfarm that will be left in place (until site closure or other), which includes soil below or immediately adjacent to the fuel pipeline that goes along the east side of the existing landfarm (access and safety issue), as well as some soil

below trailers north of the existing landfarm (access issue). There is also impacted soil at depth within the existing landfarm that will not be excavated, as we are trying to remove as much impacted soil as we can but not impact the permafrost - degradation of the permafrost would have adverse effects on the new reservoir berms. This is all aligned with the Remedial Action Plan submitted to the Board.

Although the Licence currently only has one monitoring station defined for a singular landfarm, ECCC understands that they are required to monitor the existing landfarm (and the new landfarm once constructed) for runoff, and sample as needed.

2. What is the "New Water Lagoon" stated above and being constructed at the landfarm location?

This refers to the raw water reservoir that is being constructed. The landfarm being referred to in this case is the existing landfarm that is no longer active (See description of general landfarm / contaminated soils situation above)

3. Whether the "Soil Treatment Facility Area" (SFTA) stated in your email and the "Temporary Contaminated Soil Storage" stated throughout the amendment application are the same things?

The "Soil Treatment Facility" refers to the new landfarm to be constructed in 2024, and the "Temporary Contaminated Soil Storage" refers to the area which soils are currently stored prior to landfarm construction / operations of the new landfarm. These are two separate areas.

4. What was the outcome of discussions regarding amending the current licence term D16 to replace the CCME Guidelines for treated soil by Site-Specific Target Levels as outlined in Remedial Action Plan?

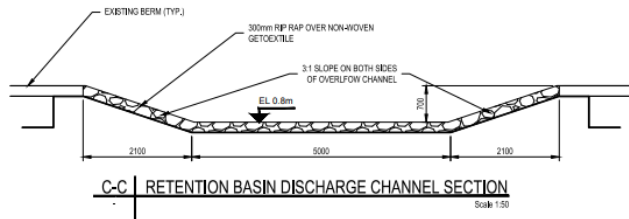
Discussions are currently ongoing, and a resolution has not been made. ECCC has not yet formally initiated this amendment request with NWB.

5. The current licence includes a definition for a Fuel Storage and Transfer Area, however, for some reasons we did not previously include a Monitoring Station and criteria list for the Effluent discharged from the tankfarm. I am wondering on what ECCC is doing with water/runoff from tankfarm containment?

There have been no water/runoff events to date. Regardless, ECCC understands that they are required to monitor the Fuel Storage and Transfer Area for runoff and sample as needed. As mentioned above, Eureka is very dry during the construction season.

6. From my understanding, upon completion of the new Wastewater Treatment Plant (WWTP) the sewage lagoon will become a "Wastewater Retention Pond" for treated sewage discharge from WWTP, correct or not? If this is the case, will the Final Discharge Point be

A figure showing a cross section of the overflow channel showing rip rap and geotextile is given below:



7. Whether sludge removal activities are planned before the lagoon becomes a " Wastewater Retention Pond" (if my understanding was correct)?

Correct, the sludge removal is planned to occur prior to converting the wastewater lagoon to a retention pond.

8. Greywater Exfiltration Trench is stated throughout the amendment application for collection of greywater until the commissioning of WWTP? Whether or not any discharge may be happening from this exfiltration trench.

The greywater exfiltration trench is the system for the treatment of greywater. Greywater is discharged into the exfiltration trench, and seeps into the ground with no surface runoff. No discharge comes 'from' the exfiltration trench. Ongoing use of the trench is planned for the summer of 2024 and 2025 and until the Wastewater Treatment Plant is commissioned.

Jean-Philippe Cloutier-Dussault

Gestionnaire immobilier, Directions des actifs, des biens immobiliers et de la sécurité

Environnement et Changement climatique Canada / Gouvernement du Canada

jean-philippe.cloutier-dussault@ec.gc.ca / Tél. : 514-641-8753

Property Manager, Assets, Real Property and Security Directorate

Environment and Climate Change Canada / Government of Canada

jean-philippe.cloutier-dussault@ec.gc.ca / Tel. : 514-641-8753

From: Karén Kharatyan <karen.kharatyan@nwb-oen.ca>

Sent: Sunday, November 19, 2023 6:51 PM

To: Cloutier-Dussault, Jean-Philippe (ECCC) <Jean-Philippe.Cloutier-Dussault@ec.gc.ca>

Subject: Re: ECCC Eureka HAWS Regulatory Project - Planned site activities for the Landfarm project this fiscal year (8BC-EUR2131)

Hi Jean-Pierre,

As Assol is not anymore with the NWB I am trying to catch up with some of her files. Hopefully, you could help me with the following questions:

1. At which stage we are with the construction of Landfarm stated in your email above? Whether this will be a Landfarm to replace the existing/previous landfarm or an additional Landfarm? I am trying to understand the Landfarm situation generally at site as the document "Eureka Sampling Procedure Standard Operating Procedure Water and Sewage Sampling" that was part of amendment application also states for Effluent discharge from Landfarm: *"Collection of sample not performed due to construction of the New Water Lagoon at this location"*.
2. What is the "New Water Lagoon" stated above and being constructed at the landfarm location?
2. Whether the "Soil Treatment Facility Area" (SFTA) stated in your email and the "Temporary Contaminated Soil Storage" stated throughout the amendment application are the same things?
3. What was the outcome of discussions regarding amending the current licence term D16 to replace the CCME Guidelines for treated soil by Site-Specific Target Levels as outlined in Remedial Action Plan?
4. The current licence includes a definition for a Fuel Storage and Transfer Area, however, for some reasons we did not previously include a Monitoring Station and criteria list for the Effluent discharged from the tankfarm. I am wondering on what ECCC is doing with water/runoff from tankfarm containment?
5. From my understanding, upon completion of the new Wastewater Treatment Plant (WWTP) the sewage lagoon will become a "Wastewater Retention Pond" for treated sewage discharge from WWTP, correct or not? If this is the case, will the Final Discharge Point be after the Wastewater Retention Pond" or is ECCC planning to discharge treated sewage directly from WWTP as well?
6. Whether sludge removal activities are planned before the lagoon becomes a " Wastewater Retention Pond" (if my undersanding was correct)?
6. Greywater Exfiltration Trench is stated throughout the amendment application for collection of greywater until the commissioning of WWTP? Whether or not any discharge may be happening from this exfiltration trench.

Your answers will be very appreciated

Regards,



Karén Kharatyan, Ph. D- ԵՂԵՐԵՐ ԵՄԵՐԻԿԱՆ

Director Technical Services - Directeur des services technique ལྷ་ཁྱེད་ཀྱི་

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KATIMAYINGI

P.O. Box 119

Gjoa Haven, NU X0B 1J0

C.P. 119

Gjoa Haven, NU X0B 1J0

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▷ நெடுஞ், மௌ: X0B 1J0

Titigaqavua 119

Uqhuqtuuq, NU, X0B 1J0

Tel / Téléphone / ᐅᐸᐸᐸᐸ / Hivayauta: (867) 360-6338 | Fax / Télécopieur / ᐸᐸᐸᐸᐸᐸ / Fax-kut: (867) 360-6369

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On Fri, Aug 18, 2023 at 1:29 PM Cloutier-Dussault, Jean-Philippe (ECCC) <Jean-Philippe.Cloutier-Dussault@ec.gc.ca> wrote:

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