



October 11, 2019

Simon-Pier Laberge
Tower Arctic LTD.
1502 Federal Road
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Iqaluit, NU, X0A 0H0
Email: info@towerarctic.ca

RE: NWB Technical Review of 2018 Annual Report for the Pond Inlet Marine Infrastructure Project; Water Licence No. 8BW-PIM1821

Dear Mr. Laberge:

The Nunavut Water Board (NWB or Board) has completed its technical review of the 2018 Annual Report (Annual Report) for Licence 8BW-PIM1821 (Licence), that was submitted by Tower Arctic Ltd. (Tower Arctic or Licensee) on March 27, 2019, and provided to the Qikiqtani email distribution list for information. No comments have been received to date.

The technical review of the Annual Report found that the information generally addresses Licence requirements, and the Board praises the Licensee on their efforts to minimize erosion and sediment from entering into waterways; however important information related to water quality monitoring was absent from the Annual Report, as outlined below.

Construction and Operations

1. PART E, Item 6, of the Licence states:

All surface runoff or discharges impacted by construction activities associated with the Project, where flow may directly or indirectly enter Water, shall not exceed the following Effluent quality limits:

Parameter	Maximum Average Concentration (mg/L)	Maximum Concentration of Any Grab Sample (mg/L)
Total Suspended Solids (TSS)	50.0	100
Oil and Grease	No Visible Sheen	No Visible Sheen
pH	Between 6.0 and 9.5	Between 6.0 and 9.5

This would include both passive surface runoff and active discharges, associated with construction activities. However no water quality monitoring data was provided in the Annual Report, and there was no indication if water quality monitoring was conducted even though the annual Report indicates that runoff from the road occurred with the potential to enter a Water.

Monitoring

2. PART I, Item 2, of the License states:

The Licensee shall obtain a digital photographic record of the water crossing before, during, and after the completion of construction activities.

The annual report did not provide photographic records of water crossings.

3. PART I, Item 4, of the Licence states:

The Licensee shall, during periods of flow, conduct water quality testing immediately upstream and downstream of the water crossings, any significant water seeps in contact with the road and any significant seeps originating from borrow pits or rock quarries prior to construction, weekly during the construction and upon completion.

The annual report did not contain any water quality data, nor was there any indication that water quality monitoring was conducted.

In the Annual report, Tower Arctic indicated that runoff from the road was occurring, and that settling ponds were constructed to help mitigate this. Thus, Licence conditions warranted the monitoring of water quality in the project area. The Board notes that discharge criteria imposed under PART E, Item 6, are limited and can be conducted on site with field meters for pH and Turbidity; and turbidity can be correlated to TSS if a project TSS/Turbidity curve is generated.

The Board Recommends that for all future works that Tower Arctic conduct water quality monitoring in accordance with Licence conditions, compare it to discharge criteria, and provide this information in all future annual reports.

The Board also recommends the Tower Arctic provide photographs of all water crossings in all future annual reports, in accordance with Licence conditions.

Finally, the Board recommends that the Licensee provide a brief summary of any/all work done to address any concerns identified by regulatory agencies or the public during the reporting year.

Thank you for taking the time to consider these comments for future reporting. Please provide, this information in all future Annual Reports, and if for some reason data or information is not

available, include a discussion indicating:

- What information is missing;
- Why it was not provided; and
- Steps being made to provide it in the future.

Should you have any questions, please feel free to contact me, Derek Donald, at (867) 360-6338 (extension 32), at your earliest convenience.

Sincerely,



Derek Donald
Nunavut Water Board,
Technical Advisor

Cc: Distribution List – Qikiqtani