

From: DeCoste, Candace (AADNC/AANDC) <candace.decoste@canada.ca>
Sent: September 29, 2017 10:10 AM
To: Sabrina Sturman
Cc: 'Claire Brown'; Yee, Stanley (AADNC/AANDC)
Subject: RE: SNP analysis requirement inquiry - NAPL

Hello Sabrina,

Thank you for clarification on the testing for “Non-Aqueous Phase Liquids/Free Phase” at the SNP stations. Based on your email we have cancelled analysis for these parameters, though analysis of “Hydrocarbons” and “Oil and Grease” will continue where specified in the Water Licence.

Should your intent be to amend the Water Licence to reflect this change, we have listed this below with the few other items we discussed earlier. Also provided are a couple of items that would be helpful to clarify and revise if you feel it's appropriate.

- Removal of “Non-aqueous phase liquid/free product” requirements per your email from stations S17L8-002 (8C), (9D), (10E), (11F), (12G) and (13H)
- Revision of “SNP Station S17L8-02 (6)” to “SNP Station S17L8-002 (6)” per other stations
- You mentioned an “X” requiring revision to “3”, and we assume you are referring to Schedule 1, Part B, Item L: “item X of this Licence”
- Annex B: Some items/dates are missing from the Concordance Table (e.g. Tailings and Waste Rock Cover Design Plan, Final Detailed Construction Plan, As-Built Report, Geotechnical Inspection Report). These dates are provided elsewhere in the Water Licence; however, inclusion in the Concordance Table would be helpful moving forward.
- Schedule 2, Part D, Item 4g: There is a lot of bedrock at the project sites so groundwater monitoring will have to take this into account. Practically speaking, addition of “Where possible” is requested given the abundance of bedrock at the project sites which would limit groundwater sampling in certain areas.
- Schedule 2, Part D, Item 4j: This might just be a consequence of the amendment to multiple monitoring plans. Sampling sediments definitely has a role in evaluating site conditions; however, typically monitoring during active remediation focuses on water due to the faster response time and large-scale heterogeneity in sediments. However, sediment sampling is common in State of Environment or Long-Term Monitoring or could be done during Post-Construction Monitoring. Consequently, we would prefer that such a requirement is moved from Construction Monitoring to one of the later programs.

Feel free to let us know if you'd like to discuss any of these items and thank you again for responding so quickly on the testing requirements.

Candace

Candace DeCoste

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From: Sabrina Sturman [mailto:sabrina.sturman@slwb.com]
Sent: Wednesday, September 20, 2017 2:23 PM
To: DeCoste, Candace (AADNC/AANDC); Yee, Stanley (AADNC/AANDC)
Cc: Claire Brown
Subject: SNP analysis requirement inquiry - NAPL

Good day Candace, Stanley, and Claire,

I am writing to provide clarity on the SNP requirement for non-aqueous phase liquid/free product analysis which was raised during our recent phone conversation as well as by INAC-CARD during the regulatory process for the renewal application S17L8-002 ([CARD Comment ID 21](#)). We have compared to other recent issuances to CARD in the Mackenzie Valley for remediation projects and find that this is a legacy item that has been carried through since the original WL [S09L8-001](#). As this requirement is not included in other CARD issuances; except at SNP locations linked to Landfarm operations, we will initiate an Administrative update at the next Board meeting (date yet to be determined) to remove this requirement.

Please let me know if there are any additional concerns that would warrant a formal amendment to the current WL.

A copy of this message will be posted to the Registry.

Respectfully,

Sabrina Sturman
Regulatory Specialist,
Sahtu Land & Water Board

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