

April 10, 2017

Kofi Boa-Antwi
Technical Advisor II
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU X0B 0C0

Sent VIA Email: info@nirb.ca

RE: Comment Request on Department for Transport Canada’s “Former Iqaluit Metal Dump Remediation” Project Proposal.

Dear Mr. Boa-Antwi,

On behalf of the Government of Nunavut (GN), I would like to thank the Nunavut Impact Review Board (NIRB) for the opportunity to provide comments on Transport Canada’s “Former Iqaluit Metal Dump Remediation” project proposal.

The GN has reviewed the proposed “Former Iqaluit Metal Dump Remediation” project and provides our comments in the attached Appendix.

Should you have any concerns with our comments, please contact me by phone at 867-975-7765 or by email at Arobinson@gov.nu.ca.

Qujannamiik

[Original Signed By]

Amy Robinson

A/Manager, Land Use and Environmental Assessment

APPENDIX (2 comments)

Screening comment # 1 of 2	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Landfill cap
References	Final Remediation Action Plan: Section 7.1 Engineered Decommissioning of Landfill (AEC 3)
CONCERNS	
<p>The proposed landfill design would include:</p> <ul style="list-style-type: none">• <i>The landfill cap would be engineered based on aggregate material available in Iqaluit to achieve a 4v:1h slope;</i>• <i>Consolidate exposed debris from surrounding areas (AEC 1, AEC 2, AEC 3, and AEC 4) into the main slope of AEC 3 – this would not only provide a suitable landfill location for the debris, but could also act to cut down on the amount of necessary borrow material required for decommissioning the landfill;</i>• <i>Extensive swale designs to divert precipitation and melt water away from the landfill slopes to prevent both erosion and water infiltration. A high level of effort would be assigned to the design and implementation of surface water diversion at the top, sides, and toe of the landfill to reduce water runoff loading and erosion of the landfill face;</i>• <i>A detailed re-vegetation strategy that may require use of a honey comb geotextile to hold seeding material; and</i>• <i>Would require the implementation of a long term monitoring program.</i> <p>The engineering states that it would use aggregate material available in Iqaluit. It does not state any compaction rates or permeability to prevent moisture from entering the site. Extensive swale design is the only stated strategy to prevent infiltration.</p>	
SUGGESTIONS AND RECOMMENDATIONS	
Please provide a more detailed rationale to the referenced material to justify grading as the primary method to prevent infiltration of surface water.	
ADDITIONAL COMMENTS	
NA	

Screening comment # 2 of 2	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Spill Contingency Plan
References	Spill Contingency Plan, Preamble, Page 3, Paragraph 2,
CONCERNS	
<p>The Spill Contingency Plan states:</p> <p><i>“There is no storage of any petroleum products or hazardous materials at this site. The spill plan has been developed for the following potential spills that could occur during the implementation of the Former Iqaluit Vehicle Dump and Community Landfill Remediation Project, Iqaluit Airport, Iqaluit, Nunavut:”</i></p> <p>As the excavation takes place a number of oxidized and rusted vehicles, drums and other containers are going to be removed. It is possible that some may have liquids present from disposal or may have accumulated liquid from capturing infiltration waters and become contaminated from the container.</p> <p>In the event the liquids are contaminated a spill could result in a negative impact.</p>	
SUGGESTIONS AND RECOMMENDATIONS	
<p>Include in the spill response plan procedures for spills resulting from containers being excavated and/or removed from the site.</p>	
ADDITIONAL COMMENTS	
NA	