

From: [Shannon Allerston](#)
To: [Markey, Andrea \(AADNC/AANDC\)](#)
Cc: [Katherine Harris](#); [DeCoste, Candace \(AADNC/AANDC\)](#)
Bcc: [Heather Scott](#); [Kimberley Murray](#); [Tyree Mullaney](#)
Subject: Giant MV2007L8-0031 October 2020 SNP report
Date: Thursday, December 3, 2020 12:25:00 PM
Attachments: [MV2007L8-0031 - CIRNAC-GMRP - October 2020 SNP Report Comments.pdf](#)

Hi Andrea,

We have attached a table with Board staff comments on the October 2020 SNP Report. If there are responses to some comments or recommendations that would help clarify things now, please provide a response for the record. Otherwise, please take these comments and recommendations into consideration when drafting future SNP reports for submission.

Thank you,

Shannon Allerston, MA, MSc
Regulatory Specialist
Mackenzie Valley Land and Water Board
7th Floor, 4922 48th St, PO Box 2130 | Yellowknife, NT | X1A 2P6
ph 867.766.7465 | fax 867.873.6610
sallerston@mvlwb.com | www.mvlwb.com

Please note: All correspondence to the Board, including emails, letters, faxes and attachments are public documents and may be posted to the public registry.



Topic	Comment	Recommendation
Table B-1 - Footnote 1	Footnote 1 states the recorded volume for SNP 43-17 (Supercrest) is capturing intermittent flow since April 2019 and does not imply a pumped volume in October 2020. This is confusing as the results provided in September 2020 indicated zero flow for that month. It is unclear why a difference in reporting approach (i.e., reporting total since April 2019 rather than determining the volume change in the reportable month) has been made.	Could GMRP please explain the difference in reporting approach (i.e., reporting total since April 2019 rather than determining the volume change in the reportable month)?
Table B-1 - SNP 43-21A	The submersible pumps at SNP 43-21A were installed under Licence MV2010L8-0010 and were deemed to be urgent works to address risks associated with the existing infrastructure. The information submitted for the amendment of Licence MV2010L8-0010 (dated November 17, 2017) indicated that commissioning of the pumps would be completed during freshet 2019. Information in Table B-1, Footnote 2 indicates that the water volume recorded for these pumps is representative of intermittent pumping from maintenance and repair. Given testing and commissioning of these pumps was anticipated to be completed in early to mid-2019, it is unclear why the submersible pumps at SNP 43-21A are operating intermittently rather than as the primary underground pumps with continual flow.	Could GMRP please provide an update on the status of the submersible pumps at SNP 43-21A and an update on the anticipated date these pumps will become fully operational?
Table D - Turbidity	The field measured turbidity still seems suspect with reported values of zero, which seem improbable given the nature of the water management system (i.e., unlined ponds) and natural conditions of Baker Creek and Yellowknife Bay. An explanation that results may be biased low because the meter was calibrated using a one point calibration method was provided as a footnote. While laboratory analysis of turbidity is completed, the concern with the discrepancy between field measured	Could GMRP please provide further information related to the turbidity meter and how potentially biased low results will be accounted for in future monitoring (both SNP and monitoring associated with construction).

	turbidity and laboratory results for turbidity and TSS remains for future monitoring related to construction. The field data is critical for such monitoring and so it is unclear how this situation will be avoided in future.	
Table D - Detection Limits	The detection limit for toluene is listed as 0.00045 mg/L, but results are reported as <0.00050 mg/L.	Could GMRP please verify the toluene detection limit.
Table F - Turbidity	The turbidity value for groundwater well SNP MW01-2A seems extremely high for a groundwater sample.	Could GMRP please provide additional information to explain the elevated turbidity value at SNP MW01-2A?
Table F - Footnotes	Footnotes 5 and 6 do not appear to be associated with any data in the table. Is this an omission or should select data be associated with these footnotes?	Could GMRP please confirm the validity of footnotes 5 and 6 in Table F?
Table G - Sampling Dates and Pressure Measurements	Water quality sample was collected from S-DIAND-001 on September 23, 2020 along with pressure measurements from zones 4 to 10, but the pressure measurements for zones 1 to 3 were collected on October 5, 2020. All of these pressure measurements were included in the SNP report for September. It is not clear why all of these pressure measurements are repeated again in the October SNP report. It is also not clear why the pressure measurements for the upper zones were not collected at the time of sample collection in September.	Could GMRP please explain the duplicate reporting of pressure measurements in September and October as well as provide information to explain why pressure measurements were not collected fully in September and any potential implications on verification of sample collection?
Table H - Units	The units reported in Table H for deep well temperature is missing the degrees (°) (i.e., it is reported just as "Celsius").	Future reporting should correct the temperature units.
Table H - Footnote	Footnote 3 does not appear to be associated with any data in the table. Is this an omission or should select data be associated with this footnote?	Could GMRP please confirm the validity of footnote 3 in Table H?
Table I - Equipment Rinsate Blank	On p.35 of the SOP for Effluent and Water Sampling state (Feb 2020), it states that an equipment rinsate blanks should be collected for each groundwater and C-shaft void sample event, but results for an equipment rinsate blank are not provided. Although GMRP explained in response to	Could GMRP please explain why the equipment rinsate blank was omitted from the groundwater sampling program in October?

	comments on the September SNP Montly Report (letter dated November 30, 2020) that a tiered approach to QA/QC is implemented, this appears to be a deviation from the SOP.	
Tables I and J - QC Samples	Although duplicate samples were collected during the groundwater sampling event, it appears (based on sample dates) that the travel blanks were only associated with a portion of the surface water sampling and that no travel or field blanks were associated with the groundwater program. In fact, no field blanks were submitted as part of the October SNP sampling collection. As such, the ability to assess potential contamination is limited.	Could GMRP please provide rationale supporting the omission of field blanks from the October sampling as well as limiting travel blanks only to a subset of the surface water sampling program?