

## Review Comment Table

<b>Board:</b>	SLWB
<b>Review Item:</b>	S17X-004 S17L8-003 - Transport Canada - Spill Contingency and Waste Management Plans (Version 1.1) and Landfarm Operation and Maintenance Plan (Version 1.0)
<b>File(s):</b>	<a href="#">S17L8-003</a> <a href="#">S17X-004</a>
<b>Proponent:</b>	Transport Canada
<b>Document(s):</b>	<a href="#">Spill Contingency Plan - Version 1.1</a> (3.2 MB) <a href="#">Waste Management Plan - Version 1.1</a> (611 kB) <a href="#">Landfarm Operation and Maintenance Plan - Version 1.0</a> (1.1 MB)
<b>Item For Review Distributed On:</b>	Feb 6 at 16:56 <a href="#">Distribution List</a> Feb 6 at 16:56 <a href="#">Distribution List</a>
<b>Reviewer Comments Due By:</b>	Mar 6, 2018
<b>Proponent Responses Due By:</b>	Mar 13, 2018
<b>Item Description:</b>	<p>Transport Canada, Prairie and Northern Region - Environmental Services, Contaminated Sites (TC) submitted Version 1.1 of its Spill Contingency Plan and Waste Management Plan on February 5, 2018. The Board approved these plans on an interim basis on Dec 5, 2017 when its decision to grant Licence S17L8-003 and Permit S17X-004 was issued. Revisions were required to include the scope of activities related to operation of the hydrocarbon contaminated soil treatment facility (Landfarm) at the Norman Wells Airport property.</p> <p>TC also submitted Version 1.0 of the Landfarm Operation and Maintenance Manual on February 5, 2018. This Manual is required by Licence S17L8-003, Part E, Condition 6.</p> <p><b>Reviewers are invited to submit questions, comments, and recommendations on these submissions using the Online Review System (ORS) by the review comment deadline specified.</b></p> <p>All documents that have been uploaded to this review are also available on our public registry. If you have any questions or comments about the ORS or this review, please contact Board staff identified.</p>
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## Comment Summary

Environment and Climate Change Canada: Melissa Pinto				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
1	General	<p><b>Comment</b> ECCC has reviewed the Transport Canada Spill Contingency, Waste Management, and Landfarm Operation and Maintenance Plans, and has no comments at this time.</p> <p><b>Recommendation</b> N/A</p>	<b>Mar 14:</b> Not applicable	
GNWT - ENR: Central Email GNWT				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
6	General File	<p><b>Comment</b> (<a href="#">doc</a>) ENR Letter with Comments and Recommendations</p> <p><b>Recommendation</b></p>		
1	Topic 1: Capacity	<p><b>Comment</b> Section 3 is related to 'Facility Design' and notes that the facility is designed to hold approximately 2500 m3 however the following paragraph outlines that the facility is currently estimated to contain approximately 4230 m3 of soil (2950 m3 in three windrows and 1280 m3 that is contained with 0.3m of cover material to protect the liner). It does not appear based on the above statement that the facility is designed for the amount of material that is currently within the facility.</p> <p><b>Recommendation</b> 1) ENR requests that Transport Canada describe why the current volume material in</p>	<b>Mar 14:</b> The LTU is not currently accepting soil and has not been active for a number of years. It is unclear how the volume of soil exceeded the design volume for the facility.	

		the facility exceeds its design.		
2	None	<b>Comment</b> None <b>Recommendation 2)</b> ENR requests that Transport Canada explain any implications or issues associated with operating the facility in its current state as well as implications for the soil remediation process if the facility is over its design capacity.	<b>Mar 14:</b> Initial soil quality data suggests that the soil will be suitable for re-use in 2018. Current decommissioning activities have not been impacted by the additional soil.	
3	None	<b>Comment</b> None <b>Recommendation 3)</b> ENR request the Transport Canada explain if there are any changes to the operation and maintenance of the facility if the volume of material is over its design capacity.	<b>Mar 14:</b> No operational impacts have been noted while preparing the site for decommissioning. Access to the soil has not been an issue and water management has not been impacted.	
4	Topic 2: Water Storage	<b>Comment</b> Section 8 notes that if overflow from the facility is occurring or imminent, water should be pumped into holding tanks. It isn't clear if these tanks already exist at site. It is also unclear if their storage capacity is sufficient to handle any overflow or runoff from the facility. <b>Recommendation 1)</b> ENR requests that Transport Canada outline the total amount of contingency volume (i.e. holding tanks) that exists on site should water storage be required.	<b>Mar 14:</b> No tanks are present on the site but there is access to 2 - 8 m <sup>3</sup> vacuum trucks which could remove water in case of emergency. This water can be transferred to off-site storage tanks while the water quality is being evaluated for suitability for discharge. The total volume that can be accommodated in tanks is 600 m <sup>3</sup> .	
5	Topic 3: Inspections	<b>Comment</b> Section 11 notes that inspections of the facility should occur "regularly" however specifics are unclear. <b>Recommendation 1)</b> ENR	<b>Mar 14:</b> Weekly inspections are anticipated during the operating season.	

		requests that Transport Canada clarify the frequency of inspections that occur at the facility during the operating season (e.g. daily or weekly).		
<b>Sahtu Renewable Resource Board: Colin Macdonald</b>				
<b>ID</b>	<b>Topic</b>	<b>Reviewer Comment/Recommendation</b>	<b>Proponent Response</b>	<b>Board Staff Response</b>
1	Document Review	<p><b>Comment</b> We have no comments on the Spill Contingency Plan, the Waste Management Plan or the Landfarm Operation and Maintenance Plan. Monitoring of surface waters and potential groundwater is taking place and procedures are in place in the event of spills by personnel on site. Two general comments: there is no mention of the level of contamination by hydrocarbons in the treated soil or the length of time expected for remediation. Also, there is a statement in the WMP that diesel fuel “bioaccumulates”. This is unlikely given the fact that most hydrocarbons are metabolised by terrestrial organisms.</p> <p><b>Recommendation</b> None.</p>	<p><b>Mar 14:</b> The results of the 2017-18 soil sampling will be presented in the annual report. We cannot find a reference to diesel fuel bioaccumulating in the Revised Waste Management Plan.</p>	