

Robin Ikkutisluk <robin.ikkutisluk@nwb-oen.ca>

[Licensing] 2AM-LUP0914 Inspection of July 15 2014

Karyn Lewis klewis@elginmining.com

Fri, Oct 31, 2014 at 3:48 PM

To: Eva Paul <Eva.Paul@aandc-aadnc.gc.ca>, Licensing Department licensing@nwb-oen.ca>, Robin Ikkutisluk <robin.ikkutisluk@nwb-oen.ca>, "phyllis.beaulieu@nwb.oen.ca" <phyllis.beaulieu@nwb.oen.ca> Cc: George Friesen <gfriesen@elginmining.com>, Patrick Downey <pdowney@elginmining.com>, Erik Allain <= Erik.Allain@aandc-aadnc.gc.ca>, "baba.pedersen@aandc-aandc.gc.ca" <baba.pedersen@aandc-aandc.gc.ca>

Hi Eva,

Please find the further information requests as per your email below.

- 1) Sewage Lagoon
- The amount released from the sewage lagoon was 112,000 m3.
- 2) Manifests Manifests for 2010-2014 were emailed on October 10, 2014.
- 3) Please see attached for verification that the leaks were not due to liner failure. In regards to the spill, LMI will submit a simplified land farm management plan in November 2014. Initially this proposed facility will be used to remediate the hydrocarbon contaminated soils located by the satellite tank farm. Upon approval of the land farm management plan, LMI would update the solid waste management plan and the spill contingency plan to reflect the use of an on-site facility for soil remediation along with the backhaul of contaminated soil.
- 4) In regards to the shack by Esker Lake, as stated by the attendees at the Technical meetings in Kugluktuk (Agnes and John) it was confirmed that this "shacks" are owned by this Inuit family, that they moved several years ago to their lands. However it should also be noted that per AANDC's response to Agnes and John at that technical meeting, AANDC clearly stated that they are not concerned about any outposts that are located on crown land at the Lupin site.
- 3) The Geotechnical Report was submitted on October 21, 2014. The Sewage Lagoons Report and an addendum in regards to the fuel storage areas was submitted on October 31, 2014.

- 4) Windblown tailings As per the discussions with AANDC via teleconference and at the Technical meetings LMI has committed to sampling to determine if the material is tailings. The only potential wind-blown material since the covering of the tailings in 2005 is esker sand from the perimeter dam and soil cover. Limited areas of exposed tailings are saturated in low lying areas of the facility and therefore are not a source of wind-blown material. A recent independent review of the sample results obtained by AANDC in 2012 stated that the analytical results represent arsenic and metal concentrations consistent with the background soil concentrations specific to the site. It also stated that the result of this single soil sample does not indicate that further remedial efforts are warranted. The report states that the 2012 AANDC sample does not document the occurrence of ongoing windblown tailings being spread into the environment. However, LMI will conduct follow up sampling in June August 2015 to characterize the material deposited below Dam 6. Samples will be collected in a 25 m grid pattern. Grain size analysis along with metals analysis will be conducted on every other sample collected from the grid row immediately adjacent to the dam. Based on sampling results, further actions and potential mitigation would be outlined as necessary by December 2015.
- 5) Compliance Plan was submitted via email on October 16, 2014.

If you have any questions or need further information please feel free to contact.

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From: Eva Paul [Eva.Paul@aandc-aadnc.gc.ca]

Sent: October-01-14 10:18 AM

To: George Friesen; Karyn Lewis; Patrick Downey

Cc: Baba Pedersen; Erik Allain; Licensing Department; Phyllis Beaulieu

Subject: RE: 2AM-LUP0914 Inspection of July 15 2014

[Quoted text hidden]

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Fuel Storage Facilities - Code Compliance Report - Lupin Mine.pdf 593K