2BE-CRA0710
Re: Correspondence between INAC and CBR Gold Corp on secondary containment structures

RE: 2BC-CRA0710
Melissa Joy <melissajoy@rocketmail.com>
AddThursday, June 4, 2009 12:19:16 PM
To:Jo Price <jop@cbrgoldcorp.com>
Cc:Kevin Buck <kevin.buck@inac.gc.ca>; Peter Kusugak <peter.kusugak@inac.gc.ca>

Hi Jo,

After reviewing your e-mail please note the following,

1) Secondary Containment should be installed on all fuel dispensing stations including tent heating and generator fuel supplies.

2) To ensure that your filters, or filter taps, are functioning and not undergoing "breakthrough", a random sampling program should be undertaken of the effluent during discharge - and analysed for Petroleum Hydrocarbon's and BTEX. As long as there is no airspace in the samples and they are kept cold they can be stored for awhile (refer to your lab for advice on specific holding times). At the high risk SC's (refuelling stations, generator area and incinerator storage areas) - results are to be forwarded to the inspector.

3) Again the onus is CBR to ensure that there is compliance with the water license and also to ensure that no waste is deposited that may cause an adverse impact to water, persons, property or the environment (as per section 87 of the Nunavut Waters Act), without approval from the NWB.

Melissa Joy
Water Resource Officer
Indian & Northern Affairs Canada
Kitikmeot Regional Office
P.O. Box 278, Kugluktuk, NU, X0B 0E0
Phone: (867) 982-4308
Fax: (867) 982-4307
Email: melissa.joy@inac.gc.ca

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From: Jo Price <jop@cbrgoldcorp.com>
To: Melissa Joy <melissajoy@rocketmail.com>
Cc: Kevin Buck <kevin.buck@inac.gc.ca>; Peter Kusugak <peter.kusugak@inac.gc.ca>
Sent: Wednesday, June 3, 2009 3:53:24 PM
Subject: RE: Fwd: RE: 2BC-CRA0710

Thanks for the clarification. We understand that the onus is on us of course to make sure that we are discharging acceptable water. I see we have a couple of solutions.

1. Remove the use of our voluntarily installed small instaberms, thus not collecting rain water/snow that requires discharge
2. Use the factory installed filter taps to remove the water or rain-drain filter pumps as you suggest while making sure that the manufacturer's specs ensure full removal of any hydrocarbons.

My preference would be to use the second option which would negate the need for hydrocarbon

sampling onsite which we know from experience does not work from our location. We have previously investigated the possibility of covering the berms but have yet to find a cost effect and "northern ready" system and would work at our site.

Would this be acceptable?

Cheers

Jo

From:Melissa Joy [mailto:melissajoy@rocketmail.com]
Sent: Wednesday, June 03, 2009 3:37 PM
To: jop@cbrgoldcorp.com
Cc: Kevin Buck; Peter Kusugak
Subject: Re: Fwd: RE: 2BC-CRA0710

Hi Jo,

Bottom line is if there is a sheen evident in the SC (any and all, regardless of size), than you need to sample before discharge. We cannot allow contaminated water to be discharged to the environment or give permission to do so; the onus is on you (CBR) to prove that it meets the criteria to discharge and retain a record of such. Allowing the berms to "overflow naturally" is not acceptable either. Based on observations and photographs of last summer's inspection at Hayes Camp, there was evidence of petroleum product build up in some SC structures; absorbent matting is an aid, not a fix-all solution.

Some suggestions for you: some camps have used "rain-drain" filters or hand pump filters that remove hydrocarbon sheen from SC (treats light to moderate contamination--refer to manufacturer specifications). You might also choose to either cover over SC structures to limit the amount of rainfall/snow that enters, or you could empty accumulated water into an empty barrel and test as a batch, or remove for proper disposal (please note that dumping in a community landfill is not considered proper disposal, regardless what an expediter advises).

The onus is on CBR to deal with this appropriately; I will be available on site this summer to observe site procedures. Hope this provides further clarification for you, and awareness of some of the options that are available to you.

Melissa

Melissa Joy
Water Resource Officer
Indian & Northern Affairs Canada
Kitikmeot Regional Office
P.O. Box 278, Kugluktuk, NU, X0B 0E0
Phone: (867) 982-4308
Fax: (867) 982-4307
Email: melissa.joy@inac.gc.ca

From:Melissa Joy <Melissa.Joy@inac-ainc.gc.ca>
To: melissajoy@rocketmail.com
Sent: Wednesday, June 3, 2009 1:43:00 PM
Subject: Fwd: RE: 2BC-CRA0710

Hi Kevin.

No, we are not planning on installing a structure for the main fuel cache at this time.

In relation to our current voluntarily installed small insta-berms, they are inspected daily with site is active, and any sheen is absorbed with matting (bagged then incinerated). Water is then tapped out of the bottom corner of the berm. We have not had any spills into the instaberms up to this point. Any sheens are from a minor drip of fuel when transferring. The larger instaberm does have a special filter on the tap and we could see if we can get thee same taps for the smaller ones.

We see that sampling of water from the small instaberms before discharge would be ineffective in our case since hydrocarbon samples are required to arrive at the lab in a very short period of time before the sample expires. From our location, this is very difficult to achieve (weather, location from nearest lab etc etc) and have results back in time for us to discard any water before the berms overflow naturally, thus rendering sampling ineffective.

Over the past few years, we have conducted annual hydrocarbon testing where possible in and around Sandspit lake to check for any contamination in run off and seepage from sumps etc. While one years samples expired before they got to the lab, the remaining samples showed no contamination. We will continue to do this in the coming years and I'll submit these results with my Annual report.

We would like to continue discharging the water from berms as I described above. Is this sufficient to satisfy Melissa's request?

Thanks

Jo

-----Original Message-----
From: Kevin Buck [mailto:Kevin.Buck@inac-ainc.gc.ca]
Sent: Wednesday, June 03, 2009 1:24 PM
To: jop@cbrgoldcorp.com; Melissa Joy
Subject: Re: 2BC-CRA0710

Hi - are you planning such a structure? - I think I speak for Melissa -anytime water is contaminated with fuel it should not be released to the natural environment unless it meets criteria - sampling is the only way to determine this - one surefire way to ensure water is not contaminated is to eliminate spillage and leaks and if they do occur ensure that they are completely cleaned up - product and sheens can be absorbed - but if it gets into the soil it has to be excavated and stored (so it won't be a source of contaminated wastewater due to precip accumulation - - I hope that clarifies things for you - kb

>>> "Jo Price" <jop@cbrgoldcorp.com> 6/3/2009 2:05 PM >>>
Hi Melissa.

Thankyou for your correspondence dated 28 May, 2008. I'm currently working on a complete rewrite of the SCP hopefully making our plan abit clearer and to address the issues you mention.

I do however, need your clarification on one of your points. On the second page, you mention in the last bulleted item that we require a sampling procedure for any water to be discharged from secondary containment structures. In our case, does this only apply to a large SC structure that we may decide to install for the main fuel cache at Hayes? Or does this apply to our small

insta-berms on our tent drums and incinerator?

I look forward to hearing from you.

Jo

Jo Price
Geologist
CBR Gold Corp.
Ph (780) 953-5575