



NWB Tools

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2BE-FER1318 Water Licence Renewal Application comments

Trevor Boyd <boyd3@sympatico.ca>

Thu, Oct 18, 2018 at 11:39 AM

Reply-To: Trevor Boyd <boyd3@sympatico.ca>

To: Derek Donald <derek.donald@nwb-oen.ca>, Licensing Department <licensing@nwb-oen.ca>

Cc: kaihui <kaihui_yang@hotmail.com>, Rick Brown <rbrown@highlandmanagement.ca>, leeshim <leeshim@leeli.com>

Hi Derek,

Below **in bold** are the responses to the questions and comments. Yes, the answers to the questions overlap in part.

Attached here as well are supporting documents mentioned in the responses.

Please do not hesitate to let me know if this is not satisfactory.

Best regards,

Trevor

Hi Trevor

To follow up on the previous email, I have a number of items listed below that will help clarify things for the Board. They are in part overlapping with intervener comments, but will provide a clearer picture of what is needed. I have provided you with 2 weeks, which is what I hope is ample time to put this information together. Please let me know if you have any questions or need clarification. I will be back in the office next Wednesday.

1. Incineration of wastes

Subject: Waste Management

Comment: The incineration of any waste oil and other certain other materials (i.e. plastics) contradicts Part D, Conditions 3 and 6, of Water Licence 2BE-FER1318.

Recommendation: Provide information on waste management to the NWB that includes incinerator specifications, details on incineration process, and a list of all materials that will be incinerated versus those that will be backhauled. Include the written indication that only wood waste, paper waste, untreated wood products, and small amounts (<500mL) of waste oil will be incinerated (i.e. hazardous wastes and/or plastics will not be incinerated).

The camp incinerator is located behind the main vehicle and parts garage approximately 150 metres away from the living quarters. Only wood, paper, cardboard, and minor residual food and stove grease waste plus less than 500ml of waste oil will be incinerated in the camp incinerator. Ash from the incinerator is stored in used fuel barrels to be shipped out with the other waste material (see 6.) stored in the camp area. Used engine and hydraulic oil, lubricants, and greases are stored in separate labelled used barrels and placed in the lined fuel berm to be eventually similarly shipped out.

Other waste materials that cannot be incinerated are sorted into bags to be flown out by charter plane on return trips to Baker Lake or by helicopter on return trips to Rankin Inlet. Separated non-incinerated waste include plastic water bottles, used plastic pieces and containers, aluminium and steel food and drink cans, aerosol cans, and used batteries.

2. Winter road use

Subject: Operations and Maintenance

Comment: It is unclear if the Applicant intends to use a winter road at any point during the term of the proposed Licence.

Recommendation: Provide the NWB with a 10-year plan for winter road use (if applicable), including any water sources (if any), spill contingency planning, etc.

Presently, Canadian North Resources and Development Corp. (CNRD) holds ROW permits to use a winter route to Rankin Inlet from INAC (LUP #N2013X0023) extended to March 2019 and from KIA (KVRW06F09) extended to October 2019. Further applications to extend these permits will be made for at least ten years as long as the project requires. The permits will be kept in place to facilitate the removal and transport of waste materials, empty barrels and non-incinerated garbage (see 6.) overland by Challenger snow tracked vehicles during the water use license period as per described in LUP #N2013X0023. There is no need or plan to utilize any water sources along the winter route.

3. Spill Contingency Plan

Subject: Spill Contingency Planning

Comment: The Spill Contingency plan requires current contact information, specifics on secondary containment at the fuel storage area, and information covering the winter road.

Recommendation: Provide the NWB with a updated Spill Contingency Plan, including current contact information and winter road operation.

All overland transport activity will include the carrying of a full spill kit and trained technician(s) capable of using the equipment. Actions with respect to any possible spills along the route and in the camp area, and the lined secondary containment at the fuel storage area are described in the attached Spill Contingency Plan which has not changed since 2015. The Spill Contingency Plan and an updated to October contact list for the plan is attached with this response.

4. Fuel and Hazardous Waste Containment Area

Subject: Operations and Maintenance

Comment: AANDC Water Licence Inspection Dated August 21, 2014, identifies water accumulation and discharge from the fuel containment area as an issue on site.

Recommendation: Provide the NWB with information on the operations and maintenance of the fuel and hazardous waste containment area that includes details on how the management of wastes and water in this area conforms to Licences conditions. Include measures that have already been taken and ones planned to maintain compliance.

In response to the above AANDC Water License Inspection, during the summer of 2015 the camp was temporarily opened and an environmental soil sampling survey was completed by ERM Rescan at the waste dump area (see 6.) to check for hydrocarbon and other contaminants. During this period, the standing water in the fuel storage berm and in catchments around the camp were also sampled and analyzed for hydrocarbons and other toxic chemicals with results finding no contamination from both sampling programs. The analytical testing report and a response letter to the inspection report describing this waste management was provided to Christine Wilson of AANDC with copies to the KIA and NWB in September, 2015. Upon return of the analyses, the water in the berm was drained prior to the closing of the camp. Based upon re-opening the camp in 2018, the berm remains near empty of standing water. The sampling and analytical report is attached here with this response.

5. Erosion control

Subject: Operations and Maintenance

Comment: AANDC Water Licence Inspection Dated August 21, 2014, identifies erosion as an issue on site.

Recommendation: Provide the NWB with information on erosion control and measures that have been taken to rectify the erosion identified in AANDC Water Licence Inspection Dated August 21, 2014. Include measures that have already been taken and ones planned to maintain compliance.

The erosion identified in the AANDC Water License Inspection is a natural acid water gossan caused by intersection of the Ferguson Lake Ni-Cu-PGE massive sulphide deposit at the surface which extends east-west intermittently for kilometres on both sides of the lake and was the original exploration indicator of mineralization on the property. The specifically mentioned location was sampled on the surface in 2010 and leveled afterwards but remains gossanous similar to the other sites of natural acid water weathering over the deposit. This explanation was included in the aforementioned AANDC response letter sent in September 2015.

6. Final Abandonment and Restoration of the Old Camp

Comment: The status of the old camp is unclear.

Recommendation: Provide the NWB with an update on the state of reclamation of the old camp, including photo and written documentation. Following final Abandonment and Restoration, a final CIRNAC inspection is still required.

Starfield Resources, after terminating their lease with the old camp owner, cleaned up all the scrap steel and garbage at the old site and removed possible contaminated soil material (placed in empty fuel barrels) which was slung by helicopter and consolidated at the new camp waste dump area during the summer of 2012. The matter remains under negotiation with the KIA, but discussions with their officials during the site visit were encouraging for the acceptance of Starfield's remediation work on the old camp area. KIA officials positively acknowledged the remediation work completed at the old camp when CNRD was considering taking over the Ferguson lake Project in 2013, but cautioned that they cannot sign-off the outstanding commitments until their inspector can visit the site including the possible completion of analytical testing showing that the site has been adequately remediated.

Approximately 50 tonnes of this material is now consolidated at the waste area with about 2,000 piled crushed and empty drums located 250 metres SE of the new camp living quarters. Photos of the waste pile, drums and fuel berm are shown in the aforementioned AANDC 2014 Inspection report which is attached here. The plan is to remove the waste material and drums overland to Rankin Inlet during winter by Challenger snow-cat train along the winter route approved in ROW permit #N2013X0023 then to ship out south the waste by barge from Rankin Inlet.

Regards,

Derek

[Quoted text hidden]

4 attachments



B.1_Ferguson Lake Project Spill Contingency Plan_2015 (1).pdf
2263K



2018 Spill Plan (Oct18) Updated Contact List.rtf
44K



Ferguson Lake 2015 FCA and Soils Sampling Memo .pdf
2104K



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1645K