

Please see comment above in regards to hazardous waste backhauled in previous years as reported in our annual reports

			All hazardous materials at site to be placed within secondary containment. Open barrels to be covered. By September 30 2014.	All hazardous (and unknown) waste is to be moved into SOUND secondary containment that meets the definition of 'secondary containment' in the current licence 28M-ULU1520. This is to be completed by June 30, 2016.	All hazardous (and unknown) waste is to be moved into SOUND secondary containment that meets the definition of 'secondary containment' in the current licence 28M-ULU1520. *	Assumed compliant, if all waste is now in containment as per January 2017 correspondence. Pending inspection.	
Waste Storage and Handling		Waste storage areas are to be clearly identified.				Assumed non-compliant: that waste areas remain unmarked.	I need to check with Discovery and WPC but if this is not completed then BCC will complete this task in 2017. As set out above, it will be treated with a lower priority than the items identified as high priority in your email of September 7, 2016.
		Waste is to be clearly identified.				Unknown.	
Fuel storage	Fuel pump set >30 m back from water and photos by 24 July.	All fuel is to be stored in secondary containment, and covered to prevent water accumulation in the containment during periods of inactivity.	All hazardous materials at site to be placed within secondary containment. Open barrels to be covered. By September 30 2014.	All barrels of fuel are to be moved into SOUND secondary containment that meets the definition of 'secondary containment' in the current licence 28M-ULU1520. This is to be completed by June 30, 2016.	All barrels of fuel are to be moved into SOUND secondary containment that meets the definition of 'secondary containment' in the current licence 28M-ULU1520. *	Assumed compliant: that all fuel and haz mat are now in secondary containment per January 2017 update from BCC. Pending inspection.	
Fuel handling	Fuel transfers to occur over drip trays.	MMG berm is to be repaired or replaced, or MMG fuel removed from site.				Resolved.	
SPILLS		Spill at the airstrip is to be cleaned up as per Spill Contingency Plan.	Spills around site are to be addressed as per Spill Plan. Contaminated soil is to be backhauled. By September 30 2014.	Spills are to be reported and addressed according to the approved Spill Contingency Plan.	Spills are to be reported and addressed according to the approved Spill Contingency Plan.	Non-compliant. BCC has failed to appropriately manage the fuel leaking from the storage pad since 2014.	This work has been given a high priority for the five worker crew arriving on site in mid-July. We expect that the spill will be addressed in accordance with our Spill Contingency Plan before September 2017.
				a) stop the flow of hydrocarbons from the fuel storage pad	a) stop the flow of hydrocarbons from the fuel storage pad		Due to BCC not being permitted to access to the land until September 6, 2016 (and ending September 30, 2016) BCC was unable to complete this task as planned. This year as there was snow on the ground when they arrived in September. This work is planned to be continued/completed during mid-July to early August 2017 and will be treated with high priority.
				b) prevent any further migration of hydrocarbons down-slope from the fuel storage pad	b) prevent any further migration of hydrocarbons down-slope from the fuel storage pad	Partially addressed: spill boom deployed at fuel storage pad and old barrels/waste were removed. Fuel remains on the pad, despite the knowledge that it is not containing spilled fuel.	Due to BCC not being permitted to access to the land until September 6, 2016 (and ending September 30, 2016) BCC was unable to complete this task as planned. This year as there was snow on the ground when they arrived in September. This work is planned to be continued/completed during mid-July to early August 2017 and will be treated with high priority.
				c) remediate the affected area	c) remediate the affected area	Non-compliant. BCC has failed to appropriately manage the fuel leaking from the storage pad and instructions of the inspector since 2014.	Due to BCC not being permitted to access to the land until September 6, 2016 (and ending September 30, 2016) BCC was unable to complete this task as planned. This year as there was snow on the ground when they arrived in September. This work is planned to be continued/completed during mid-July to early August 2017 and will be treated with high priority.
O+M	Liners and berms to be assessed in next geotechnical inspection.					Assumed incomplete: geotech was submitted 121127 to NWIS. BCC was recommended to cover exposed liners and repair damaged liners. Cover letter indicates that a compliance plan would be developed and plan discussed with the inspector, but no actual work was proposed to implement recommendations. No compliance plan was received. 2013 geotech recommended repairs to berms and liners in 2014. To my knowledge, no repairs / significant site maintenance has been undertaken.	Please see 2016 annual report and 2016 Geotechnical inspection report cover letter. Due to BCC not being permitted to access to the land until September 6, 2016 (and ending September 30, 2016) BCC was unable to complete this task as planned as there was snow on the ground when they arrived in September. BCC intends to carry out this work in 2017, time permitting.
Monitoring		The Monitoring program is to be implemented immediately, or documentation provided to the Inspector by July 31, 2013 that demonstrates authorization of the Board to discontinue Monitoring.	Monthly monitoring during snow-free season is to be implemented (including Freshet). This includes monitoring of waste + fuel as well as implementing the monitoring program as per the licence.			Non-compliant. Monitoring was not undertaken as required for the last several years.	BCC intends to carry out this work in 2017 as required.
				Establishment (and regular maintenance) of sediment control measures to prevent further sediment loading of streams that have been affected by road deterioration. These measures are to be put in place at freshet (now 2017).	Establishment (and regular maintenance) of sediment control measures to prevent further sediment loading of streams that have been affected by road deterioration. These measures are to be put in place at freshet (now 2017).	Partially addressed: Silt curtains installed and road maintenance undertaken at two wash-outs along the road. Regular inspections and maintenance are required.	Some repairs were started this season and further repairs are planned to continue next season as long as BCC is able to obtain permission from the KIA to access site
					Conduct a visual assessment of all culverts on site, and provide a report including: GPS coordinates of each, culvert condition, whether flow is possible or obstructed in any way. This report shall be submitted to the inspector by September 30, 2017.	To be undertaken 2017.	BCC intends to carry out this work in 2017 as long as they are able to obtain permission to access the site from the KIA.
Progressive reclamation		A timeline to address progressive reclamation of drill sites is to be prepared.		A complete list of drill holes (with GPS coordinates) associated with this project (drilled by past and current operators) is to be provided to the Inspector. Please identify any holes that are known to be reclaimed according to the terms of the licence. This list is to be provided by January 31, 2016.	Conduct a visual inventory of all the known drill holes, as per the list provided to the inspector in 2015 (approximately 365 holes). Each drill hole shall be inspected for compliance with Part I items 13 and 15, and any other relevant conditions of the licence. The Licensee shall reclaim each hole that does not satisfy these conditions to a pre-disturbed state, including contouring, cutting of drill casings or collars flush with the ground, and any other remediation required (spills, debris etc). The Licensee shall complete this work over the next one (1) to three (3) years, with a minimum of one third to be completed each year, beginning in 2017. A table shall be submitted to the inspector by June 01 of each year, beginning in 2017, that lists the drill holes to be inspected in that year by hole number and location, and the dates the work will be undertaken. The Licensee shall submit by September 30, of each year, beginning in 2017, a table that describes each drill hole completed by number, location; whether it satisfied the licence conditions; and where no, confirmation that the hole was reclaimed. Photographs before and after are encouraged. Work is to be conducted in the snow-free season.	To be undertaken 2017.	Due to BCC not being permitted to access to the land until September 6, 2016 (and ending September 30, 2016) BCC was unable to complete this task as planned this year as there was snow on the ground when they arrived in September. BCC intends to carry out this work in 2017 as long as they are able to obtain permission to access the site from the KIA.
					Removal of the dock and any structures that may become waste in the water	To be undertaken 2017.	BCC intends to carry out this work in 2017 as long as they are able to obtain permission to access the site from the KIA.
Plans / Reporting	Current CM plan, Waste Mgmt Plan to Inspector by 24 July.			revised QA/QC plan and letter as required by the licence are to be submitted to the Board by November 30, 2015.		Compliant.	
Inspection Follow-Up		Required actions are to be completed and a report submitted to the Inspector by September 30 2013. Report received, but items not addressed to the satisfaction of the Inspector.	A report with the details of required actions above is to be submitted to the inspector by October 31, 2014. Received December 9 at the request of the Inspector.	Compliance work to be completed by July 31, 2016 and a confirmatory report submitted to the inspector by August 15, 2016. BCC notified the inspector on September 6 that they had not had access to site, and now had a temporary LUP. BCC did not attend site until September 2016, and then only partially completed the work.	Provide confirmation in writing by December 15, 2016, of those activities carried out in 2016 (a list of priorities was sent to BCC on September 9, 2016). Received January 19, 2017. Work partially completed. Response was only received after prompting BCC. The rest of the activities are to be carried out in 2017.	have discussed the outstanding compliance issues and environmental hazards at the Ulu site with Wynter at the KIA, and I will be working with her to ensure that, even if tenure issues remain unresolved in 2017, there will be a mechanism to ensure that BCC/WPC can carry out their obligations under this water licence. The fact remains that these issues should have been addressed prior to 2016 as they were identified in several past inspection reports. As with the issues at Lupin, I will issue a Direction if/when necessary but I would hope that the project can be brought into compliance without entering the enforcement realm.	BCC thanks you for reaching out to Wynter at the KIA and I look forward to having a phone call between the three of us to ensure we have access to site to be able to address your concerns and make sure we are compliant. BCC has not desire to be in compliance and we look forward to working with you this season to resolve all or as many as possible, of your concerns.
				Response to my questions of January 16 and 19, 2015, by November 30, 2015. Response received October 30 - 9 months after request.	Review the 2013-2015 inspection reports, and create a work plan for 2017 that will address all of the outstanding work, and including the items identified below. This work plan is to be submitted to the inspector for review and approval by January 31, 2017. Failure to address these deficiencies according to the approved plan will result in enforcement action. No workplan has been received as of February 9, 2017.	Here is a summary of the outstanding work and compliance issues at site. Workplan to be submitted to the inspector for review by February 28, 2017.	As discussed, due to some unexpected urgent personal matters, I was unable to meet the deadline of February 28, 2017 and I hope that receiving the work plan now is suitable to you. My apologies.