



WATER LICENCE INSPECTION FORM

☒ Original
☐ Follow-Up Report

Licensee	Licensee Representative
LMI / Elgin Mining	—
Licence No. / Expiry	Representative's Title
2BM-ULU 0914	—
Land / Other Authorizations	Land / Other Authorizations
Date of Inspection	Inspector
12 July 2014	Eva Paul
Activities Inspected	
☒ Camp ☐ Drilling ☐ Mining ☐ Construction ☐ Reclamation ☒ Fuel Storage	
☐ Roads/Hauling ☒ Other: WASTE ☐ Other:	

Conditions: A - Acceptable C - Concern U - Unacceptable NA - Not Applicable NI - Not Inspected

Water Use	Condition	Comment	Site Conditions	Condition	Comment	Haz/Mat Management	Condition	Comment
Intake/Screen	NA		Water Management Structures	A		Storage	U	2
Flow Measure. Device	NA		Culverts / Bridges	A		Spills	U	2
Source:	NA		Drainage	A		Spill Plan	A	2
Water Use:	NA		Erosion / Sediment	A				
Recirculation (y/n)	NA		Mitigation Measures	U	2	Administrative		
			Reclamation Activities	NI		Records	NI	
			Materials Storage	A		Reports	U	4
Waste Disposal			Signage	A		Plans	A	
Waste Water	NI					Notifications	NI	
Solid Waste	C	1.	Monitoring			Other		
Hazardous Waste	U	2	Sample Collection / Analysis	U	3			

*The number in the comments field will correspond with specific comments provided below.

Samples taken by Inspector:	Location(s):
☐ Yes ☒ No	

SECTION 1 ☒ Comments (s.1+2) ☒ Non-Compliance with Act or Licence (s.2) ☒ Action Required (s.3)

1. It does not appear that waste was backhauled since 2012. No records were provided in the annual report.
2. While the 2013 Annual Report indicates that drums and waste were addressed as per the 2013 Inspection report, however, I found hazardous waste in numerous areas without containment. It was not removed as indicated in the annual report. I found leaking barrels of hazardous waste on the mine waste pad, at the barrel storage area beside the tank farm, amid the waste piles east of the helipad and barrels at the airstrip which should have been removed in 2013. The waste management plan and the Care and Maintenance Plan indicate that hazardous materials are to be stored in containment until backhaul. The Spill Plan is not being followed, as spills are occurring which are not being addressed. Proper mitigation for spills is not being employed by lack of containment, monitoring, and clean-up. Spilled fuel is migrating out of the storage pad and down-slope.

Licensee or Representative	Inspector's Name
	Eva Paul
Signature	Signature
Date	Date
	July 14, 2014

Office Use Only: Follow-up report to be issued by Inspector ☐ Yes ☐ No



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SECTION <u>2</u>	☒ Comments (s. <u>2</u>)	☒ Non-Compliance with Act or Licence (s. <u>2</u>)	☐ Action Required (s. <u> </u>)
3. Monitoring is not occurring, contrary to the C+M Plan and the licence. Full monitoring is still required as outlined in the licence. Monthly reports are inadequate.			
4. Annual Report was deficient in details. No numbers were provided with respect to waste backhaul or work anticipated for 2014. Inspector's concerns of 2012 and 2013 have not been addressed. Monthly reports should include monitoring results, not 'we are in C+M'.			
<u>Non-Compliance:</u>			
Part B.13. Implementation of Plans as approved:			
Care and Maintenance Plan			
Spill Contingency Plan			
Waste Management Plan.			
Part E.3. Secondary Containment for all hazardous materials and fuel storage			
Part E.6. Employment of the Spill Contingency Plan, reporting of spills, clean up of spills.			
Part J.1. Implementation of Monitoring Program.			

SECTION <u>3</u>	☐ Comments (s. <u> </u>)	☐ Non-Compliance with Act or Licence (s. <u> </u>)	☒ Action Required (s. <u>3</u>)
① All hazardous materials at site are to be placed within secondary containment. Open barrels are to be covered also, to prevent creation of contaminated water. -Sept 30, 2014-			
② Spills around site are to be addressed as per the Spill Plan. Contaminated soil is to be backhauled. -Sept 30, 2014-			
③ 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. - Effective immediately -			
④ All new hazardous waste is to be backhauled in the year it is created to prevent the accumulation of waste to unmanageable levels.			
⑤ A report with the details of ①+② above is to be submitted to the inspector by October 31, 2014			

Licensee or Representative	Inspector's Name
	EVA PAUL
Signature	Signature
Date	Date
	July 14, 2014