



NWB Tools

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

Re: 2BM-ULU1520 Inspection of July 6-7 2016

Eva Paul <Eva.Paul@aandc-aadnc.gc.ca>

Thu, Oct 20, 2016 at 4:41 PM

To: Karyn Lewis <klewis@elginmining.com>, InukshukGeological@shaw.ca, Stephen Wilkinson <s.wilkinson@shaw.ca>

Cc: Erik Allain <Erik.Allain@aandc-aadnc.gc.ca>, Wynter Kuliktana <srlands@kitia.ca>, Licensing Department <licensing@nwb-oen.ca>

Sending again due to file size.

>>> Eva Paul 10/20/2016 4:28 PM >>>

Hi Karyn and Stephen,

Please find attached the report of my July 6 Inspection at Ulu. Overall, the state of this site is unsatisfactory. There are numerous non-compliances with the water licence, and the failure to address deficiencies as outlined in the 2013-2015 reports poses risk to the environment. Please note the actions required, as listed in the third section of this report, and their associated timelines.

Do not hesitate to contact me with questions.

Regards,

Eva Paul

Water Resources Officer | Agent des ressources en eau

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----- Forwarded message -----

From: Eva Paul <Eva.Paul@aandc-aadnc.gc.ca>

To:

Cc:

Date: Thu, 20 Oct 2016 18:40:13 -0400

Subject: Fwd: Priorities for Ulu

>>> Eva Paul 9/7/2016 9:52 AM >>>

Hi Karyn,

Thank you for your call, and for confirming that you now have a LUP from the KIA allowing you to conduct work at site. I understand that the LUP is of short duration, and as such am listing what I see as immediate priorities:

From 2015 Inspection (please review 2015 report which provides photos of the areas in question):

5. All hazardous (and unknown) waste is to be moved into SOUND secondary containment that meets the definition of 'secondary containment' in the current licence 2BM

-ULU1520. *

6. All barrels of fuel are to be moved into SOUND secondary containment that meets the definition of 'secondary containment' in the current licence 2BM

-ULU1520. *

Removal from site of any and all of the above would, of course, be preferable to storing it for any longer.

7. Spills are to be **reported** and addressed according to the approved Spill Contingency Plan. Steps are to be taken to a) stop the flow of hydrocarbons from the fuel storage pad, b) prevent any further migration of hydrocarbons down-slope from the fuel storage pad, and c) remediate the affected area.

The flow of hydrocarbons from the fuel storage pad is only easily visible when the sand is dry. I noted in 2015 that my photos showed the contamination clearly, but Andrew's (taken later and during a rain event) did not. This summer (2016) I recorded a GPS track of the perimeter of *what was visible on the surface*, which I have attached, along with the waypoints of the two shallow samples I took. Please note that this is a **starting point** of where sampling should occur to determine the extent of contamination; the actual extent under the surface may be greater. Please ensure qualified personnel are present to delineate the contamination and to guide the work.

Client Sample ID	Sample Type	Sample Collect Date	Parameter Name	Reported Result	Units
ULU Soil 1	Soil	08-Jul-16	F2: C10-C16	29	mg/kg
ULU Soil 1	Soil	08-Jul-16	F3: C16-C34	3740	mg/kg
ULU Soil 1	Soil	08-Jul-16	F4: C34-C50	1360	mg/kg
ULU Soil 2	Soil	08-Jul-16	F2: C10-C16	147	mg/kg
ULU Soil 2	Soil	08-Jul-16	F3: C16-C34	9690	mg/kg
ULU Soil 2	Soil	08-Jul-16	F4: C34-C50	2970	mg/kg

** "Secondary Containment" means an impermeable structure, external to and separate from primary containment, which prevents unplanned spills of hazardous materials and provides a minimum capacity of 110% of the original vessel. Where multiple vessels are stored within the containment, it must provide a minimum capacity equal to the sum of the largest vessel and 10% of the aggregate volume of all other vessels located in the containment. This structure shall also provide containment and control of hoses and nozzles.*

Time permitting:

-removal of the dock and any structures that may become waste in the water.

-repair to portal containment pond, in case it is required in the future

Also required (for 2017 spring freshet) from 2015 Inspection:

4. 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**).

Other:

A full inspection report from the July 2016 inspection will follow when time permits.

Please ensure that normal water use/waste disposal records are kept and that all reclamation activities are photographed and reported in the Annual Report.

Again, thank you for your call.

Regards,

Eva Paul

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2 attachments



2BM-ULU1520 Inspection of July 6-7 2016.pdf
3077K



2BM-ULU1520 REPORT OF JULY 15 2015 INSPECTIONsmall.pdf
3015K