

	2012 Inspection (July 17) findings:	
1	Fuel and pumps placed within 30m of water.	
2	Fuel transfers occurring without drip tray.	
3	RBC unit discharging untreated effluent to the lake.	
4	Unsatisfactory storage of chemicals and hazardous materials.	
5	Operating with outdated plans.	
	Inspector's Requirements:	2012 Follow-Up:
1	Fuel pump set >30 m back from water and photos by 24 July.	Photos submitted 27 July of new pump, although fuel barrel still showed at old location.
2	Effluent immediately diverted to lined mine containment sump until discharge criteria are met or alternative disposal for human waste is implemented.	BCC repeatedly requested permission to continue to discharge non-compliant effluent to the lake. This was refused by the Inspector. Photos of the re-routed output were submitted 27 July after the Inspector requested them on the 26th. BCC confirmed 16 Aug that effluent met discharge criteria and normal operation would resume. BCC was notified on 5 Aug that discharging non-compliant sewage to the environment is not an acceptable option, and that for future short-term programs this would have to be addressed.
3	Fuel transfers to occur over drip trays.	No comment was returned.
4	Liners and berms to be assessed in next geotechnical inspection.	Geotech was submitted 121127 to NWB (not copied to the Inspector). 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 is proposed to implement recommendations. No such documents were received, and as the Inspector did not receive this letter, it was not pursued.
5	Current CM plan, Waste Mgmt Plan to Inspector by 24 July.	Deadline not met. Plans were requested again on July 26th. Plans were provided July 31. Inspector's comments (Aug 5) were incorporated into the 130430 version of the plans.
6	Oils & haz waste to be collected and placed in containment by 31 July.	No confirmation received.
	2012 Admin:	
	2012 Annual report does not address Part B Item 8 (g); actions to address concerns detailed in the Inspection reports.	
	130430 CMP states that BCC will carry out repairs to the tank farm berms in 2014.	
	130430 WMP indicates that the incinerator needs repairs and will be retrofitted or upgraded prior to the next exploration season.	
	2013 Inspection (July 5) findings:	
1	Waste storage areas unmarked.	
2	Barrels found on rock pad.	
3	Empty barrels and haz waste remain (2012 sewage at airstrip).	
4	Numerous spills noted on-site and two leaking barrels were found (one outside of containment).	
5	MMG's berm at the airstrip is torn. BCC is responsible for activities conducted on their site.	
6	Drill sites are not adequately restored.	
	Inspector's Requirements:	2013 Follow-Up:
1	All fuel is to be stored in secondary containment, and covered to prevent water accumulation in the containment during periods of inactivity.	As per report of 30 Sept., fuel is in containment. Containment was not indicated to be covered.
2	Hazardous waste is to be backhauled.	Per report of 30 Sept., hazardous waste was moved to a storage area (the tank farm).
3	Sewage at the airstrip is to be backhauled in 2013, and as much hazardous waste as possible removed from site.	Per report of 30 Sept., sewage was backhauled to Yellowknife. No further hazardous waste was removed.
4	MMG berm is to be repaired or replaced, or MMG fuel removed from site.	Per report of 30 Sept., MMG removed the fuel and berm.
5	Spill at the airstrip is to be cleaned up as per Spill Contingency Plan.	Per report of 30 Sept., small spill at the airstrip was shoveled up and the barrel placed with other haz waste.
6	Items 1-5 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 (as above).
7	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.	Inspector received 12 December a note from BCC indicating that BCC would update the CM plan to reflect a reduced level of monitoring. Inspector responded same day that until the requirements are modified in the licence, BCC is still bound by them.
8	Waste storage areas are to be clearly identified.	No comment received.
9	Waste is to be clearly identified.	No comment received.
10	A timeline to address progressive reclamation of drill sites is to be prepared.	Nothing received 2013.
11	Items 8-10 are to be addressed in the next field season.	Nothing received 2013.
	2013 Admin:	
	Geotech submitted to NWB November 2013. Recommends repairs to berms and liners in 2014. Same repairs as recommended in 2013, but as they were not undertaken, the engineer included a date.	
	130430 WMP indicates that the incinerator needs repairs and will be retrofitted or upgraded prior to the next exploration season.	
	BCC maintains in their monthly and annual reports that various provisions of the licence are not required because the site is in CM, despite the fact that the licence is a CM licence. Monthly reports have not been submitted in the required timelines (eg-April and May received July 30) and do not speak to the actual required monitoring.	

1	
2	
3	
4	
5	

	2013 Follow-Up:	Status January 2015:
1		Resolved
2		Resolved: This was only intended as a short-term, emergency solution to an immediate problem. I maintain that the RBC is not an appropriate tool for sewage management for short term programs due to the time required to get the RBC 'on-line'. Land vs. water discharge does not change the fact that BCC needs meet discharge criteria at the last point of control (where sewage leaves the pipe). As per monthly reports, Pacto toilets were used in 2014.
3		
4		Uncertain. No compliance plan was received by the Inspector. Work may have been carried out in 2014 (to be reported March 2015).
5		Resolved.
6	Unresolved. 2013 inspection revealed more fuels and hazardous waste outside of containment. Per report of 30 Sept 2013., hazardous waste was moved to a storage area (the tank farm), however, by that time the company had been requested to backhaul the waste. More hazardous materials were located in 2013 (as per below).	May have been resolved in 2014, although it's uncertain whether BCC has endeavoured to find any haz mat that was not identified by the Inspector. See specific comments in 2014 compliance discussion (follows).

	Consistent with geotech.	Uncertain.
	No indication from BCC in 2013 that this was addressed. Remains outstanding.	Uncertain. See 2014 discussion (follows).

1	
2	
3	
4	
5	
6	

	2014 Follow-Up:	Status January 2015:
1	Mostly resolved.	Resolved. Fuel is assumed to be all in secondary containment but not covered.
2	Unresolved. While hazardous waste has reportedly been moved into containment, none has been backhauled.	Unresolved. BCC was told in 2013 to remove specific hazardous waste, and in 2014 to backhaul all new hazardous waste. While hazardous waste has reportedly been moved into containment, none has been backhauled.
3	Sewage was removed.	Resolved.
4	Resolved	Resolved.
5	Partially resolved. (See comments on hazardous waste removal).	Resolved.
6	Other issues are addressed in separate comments.	
7	Unresolved. See 2014 discussion (follows).	
8	Outstanding. No work on this item was noted during 2013 and 2014 inspections.	Outstanding. No work on this item was noted during 2013 and 2014 inspections.
9	Outstanding. No work on this item was noted during 2013 and 2014 inspections.	Outstanding. No work on this item was noted during 2013 and 2014 inspections.
10	Outstanding. Nothing has been received by inspector.	Outstanding. Nothing has been received by inspector.
11	Outstanding.	Outstanding.
		Uncertain. No submissions yet from BCC for 2014 indicate that this work was undertaken.
		Uncertain. No indication whether repairs were made to incinerator. No comments in monthly reports indicate whether incinerator was used. Clarification has been requested from BCC (January 16).
		Generally outstanding, as BCC refuses to undertake monitoring as outlined in the licence. See 2014 discussion (follows).

	2014 Inspection (July 12) Findings:	LMI Response July 31
1	Lack of waste backhaul since 2012.	Not enough room on plane for all the waste (2013). The area where the hazardous waste referred to in your 2014 trip report at the Mine Waste Pad was not photographed or discussed in the 2013 report and DMS therefore did not work here as we now assume they were referring only to the hazardous waste photographed and discussed in the 2013 report by the rock pile area and DMS did move those to the lined berm – so we believe there is hazardous waste at the Mine Waste Pad and the Waste Piles east of the helipad, so we plan to deal with those items this year. The barrels you refer to that are at the airstrip I believe are all empty and the leak/spill were addressed by DMS. If there are any barrels with fuel they will be moved to the fuel storage area. The barrels at the barrel storage area beside the tank farm were deemed ok but your 2014 report indicate that there was leaks, which we will follow up on. Your report states we are not cleaning up our spills, which we will also follow up on as that was also supposed to have been completed , however our understanding is that the 2013 report only the identified the spill at airstrip and this was addressed last year.
2	Hazardous waste remains widespread on site: mine waste pad, barrel storage area beside tank farm, in waste piles east of helipad, and barrels at the airstrip.	
3	Lack of containment, monitoring, and cleanup of spills. Fuel is migrating off the storage pad and down-slope.	
4	Lack of monitoring; inadequate reporting in monthly reports.	Below.
5	Annual report deficient.	

	Inspector's Requirements:	LMI Response July 31
1	All hazardous materials at site to be placed within secondary containment. Open barrels to be covered. By September 30 2014.	
2	Spills around site are to be addressed as per Spill Plan. Contaminated soil is to be backhauled. By September 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.	
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.	

	2014 Admin:
	130430 WMP indicates that the incinerator needs repairs and will be retrofitted or upgraded prior to the next exploration season.
	Geotech submitted to NWB November 2013. Recommends repairs to berms and liners in 2014. Same repairs as recommended in 2013, but as they were not undertaken, the engineer included a date.
	Renewal docs submitted June 2014.
	LICENCE EXPIRED AUG 31 2014.
	No notification submitted under Part H Item 1 that site would be activated. No mention was made to inspector during July visit that site would be active in August.
	141021 August Monthly Monitoring Rpt: indicates that DMS and WPC Resources were on-site from Aug 22-31 to conduct work. 10 days 6900L / 6.9m3 water reported.
	141021 September Monthly Monitoring Rpt: indicates that DMS and WPC Resources were on site September 1-5 2014 to conduct work. This is after the licence expiry. 5 days, 8200L / 8.2 m3 water reported.
	WPC Resources led me to believe their work was only conducted in August; WPC's licence was not issued until November 2014 (and does not allow for a camp).

	LMI Response December 9 (following prompt sent that day)	Status January 2015:
1		
2		Generally speaking, BCC needs to familiarize themselves with their property. It is not up to the Inspector to identify every scap of waste that is out of place. If the direction is given to put hazardous waste in containment, the responsibility lies in the Licensee to conduct a thorough search of the site and implement the action required.
3		Same goes for cleaning up spills. The Inspector is of the opinion that BCC is not demonstrating due diligence in this regard.
4		Comment below.
5		Please provide full requirements for 2014 AR.

	LMI Response December 9 (following prompt sent that day)	Status January 2015:
1	All the fuel is in now within the containment area. All barrels have been moved to the containment area. The eleven barrels that were in the waste dump were moved to the containment area. The ten barrels in the photos that were along the road by the airport have been moved to the containment area.	Potentially resolved.
2	A number of oil spills were cleared up. The material is now held in six barrels that have been put into the containment area.	Unresolved. Lacking in detail. No indication has been given regarding the fuel migrating off the storage pad. Soil was not backhauled despite explicit instruction to do so.
3		Unresolved. BCC refuses to undertake monitoring as outlined in the licence. BCC was informed in 2013 that until the requirements are modified in the licence, BCC is still bound by them. All water sampling requirements for 2014 were blatantly disregarded. The last known sampling was conducted June 2013. Monthly reports have not been submitted in the required timelines and do not speak to the actual required monitoring, only a notification of whether or not there was activity. Two reports speak to water use and waste, but waste disposal is not quantified in terms of the licence conditions. The Inspector is unable to locate a monthly report for July 2014.
4	59 empty barrels were backhauled to Yellowknife.	Unaddressed: BCC backhauled 59 relatively-benign empty barrels rather than the hazardous waste they were instructed to backhaul.
5		Received December 9 at the request of the Inspector.

	Status January 2015:
	Uncertain. No indication whether repairs were made to incinerator. This now becomes an issue as we learn the site was active in 2014. No comments in monthly reports whether incinerator was used. Clarification has been requested from BCC (January 16).
	Uncertain. No submissions from BCC for 2014 indicate that this work was undertaken.
	Renewal was submitted very last-minute and incomplete.
	Unresolved. Renewal licence has not yet been issued. All water used and waste deposited after August 31 was in contravention of the Act.
	Non-compliance with Part H Item 1. It was a surprise to the Inspector to find that the site had been active in August and September.
	BCC should not have authorized other companies to conduct work out of Ulu camp with the licence on the verge of expiry. WPC did not have a licence to conduct their own work (but did conduct their own work off-site). Report does not indicate what was done with domestic waste (and Pacto bags). Inspector has requested clarification (January 16).
	Water use and waste disposal in September was in contravention of the Act. Need clarification on quantity used; 8.2 in 5 days seems unlikely. Most likely was a continued reading from August (the difference would be 1.3m3). Inspector has requested clarification (January 16). If the quantity is accurate, this is an exceedance of the (expired) licenced amount.
	Clarification is required whether WPC was still on-site in September as indicated in BCC's monthly report.