

Weber Arctic Expeditions response to CIRNAC Review Licence 2BL-AWL1722 Renewal Application for the Arctic Watch Lodge Project in the Qikiqtani Region of Nunavut

June 1st, 2023

Our file - 7BL-AWL1722

Your File Reference: GCDocs#113400898

This is the second round of reviews presented to CIRNAC water board in response to the May 17th, 2023 comments and recommendations.

1. 2019 Inspection actions required

Comment:

The 2019 Water Licence Inspection report contains photos of: fuel caches within 31 metres of the high water mark, sign of spills, 19 barrels on top of liner, and hazardous waste stored on the edge of the liner thereby secondary containment would not keep the hazardous waste in. CIRNAC notes the proponents response that the mobile sewage storage tank have been moved, however the other non-compliance issues and actions from the 2019 inspection noncompliance issues and actions required have not been satisfactorily addressed. CIRNAC maintains the recommendation that until such time as the requirements detailed under the inspection report are met that a renewal license is not issued by the NWB.

Response:

This coming season we will relocate the fuel berm mentioned above to a new location above the 31 meter highwater mark. The new location is marked on the map in Appendix G of the spill contingency plan. The new location is where we currently store our scrap metal for welding and construction. As we are currently not at Arctic Watch lodge this cannot be completed until we get to the lodge in June and the snow melts allowing us to move the berm. The inspector in July can confirm the fuel berm's new location above 31 meter high water mark.

We will make sure there is no hazardous waste stored on the edge of the liner. The only hazardous waste produced is used oil and it is contained in a sealed bucket which is also on top of a fuel berm, until it is transported back to Resolute or Yellowknife. Hazardous waste is also stored in sealed buckets in the generator building in a tray and the building has containment under the floor. Your inspector in July can confirm these changes.

Looking at the 2019 photos from your inspection, your department is mistaken. The 19 drums you mention and that were photographed are on the very large fuel berm over the airstrip, not the fuel berm by the lodge. That fuel berm can certainly contain 19 drums. The berm at the lodge has 5 drums in the photo.

Again we did not have a spill in 2019. The photos from your inspection report were merely drips that were wiped up. We may have had a few drops on the rock from switching fuel pumps out or changing ATV on a windy day. This is not a common occurrence. If a spill was reported of such great concern by your inspector in 2019 why didn't your inspector at the time ask us to clean it up on site during the inspection? Regardless, since 2019 our current policy and lodge standards to conduct any vehicle repair with a thick, liquid proof fabric under the vehicle.

We will be sure that our new fuel berm conforms to the volume standards while maintaining a minimum of 110% of the original vessel and 10% of the aggregate volume of all other vessels located in the containment.

2. 2022 Annual Report

Comment:

CIRNAC has reviewed the 2022 Annual Report submitted as part of the proponent's May 17, 2023 response. Actual quantity of water used is reported as an average of 3.07 cubic meters per day. CIRNAC recommends the licensee specify if the actual quantity of water used exceeded 5 cubic meters on any day, and if so the water license renewal application be adjusted to accommodate that volume.

Response:

As our photos of the lodge water meter provided to you, it only counts the season total. We do not register the water meter every day. We take the season total of water used and divide by the total number of days which water was used. This is how the daily average is calculated. It is well below the permit allocation of 5 cubic meters daily. Our water use is very consistent throughout the entire season. We don't have a reason to use a significantly larger amount of water on a given day. There is no reason to think we used 5 cubic meters on a specific day.

3. Water license expired**Comment:**

The proponent confirms they operated without a water license from August 2 to 24, 2022.

CIRNAC insists site activities only take place with a valid water license and that the terms and conditions of the water license are met.

Response:

It was not our intention to operate without a water license. We will not do this again. To avoid this issue please ensure that the renewal date or expiry date for any future water licenses does not fall in the middle of our operational season June 15 - August 25th. For any future licenses it would be better for both parties if the month for renewal or exhortation falls in between December and February.

5. Quantity of daily water used**Comment:**

The proponent's response reiterates the average water use value in cubic meters per day in 2022. This does not satisfy CIRNAC's if the measured quantity of water used exceeded 5 cubic meters on any day. CIRNAC recommends the proponent provide the information requested.

Response:

The answer is no, we don't use more than 5 cubic meters on any given day. As mentioned above, this is not possible for us to know. We simply calculate the daily season average over the whole season. We do not check the water meter every single day. We are well below the permit allocation of 5 cubic meters. As reiterated above our water usage is very consistent throughout the entire season. There is no reason to think we need a substantial amount more on a specific day.

6. Spill contingency plan**Comment:**

CIRNAC has reviewed the revised May 2023 Spill Contingency Plan and notes the text "contaminated materials that are waiting transportation are stored on in an existing fuel berm" has been added to Section 12.0. CIRNAC recommends a photo of the referred to existing fuel berm area is included in the Spill Contingency Plan along with: a site map indicating where the referred to fuel berm area to be used is located on site, and a calculation of the volume of impacted materials that can be added to the referred to fuel berm area while maintaining a minimum of 110% of the original vessel and 10% of the aggregate volume of all other vessels located in the containment.

In accordance with the Spills Working Agreement, CIRNAC is the designated lead agency on spills which occur at facilities authorized by federal legislation. This means that if a spill occurs at any facility authorized by the Nunavut Waters and Nunavut Surface Rights Tribunal Act under the water license CIRNAC would be the lead agency to consult. CIRNAC recommends Table 1: Spill Contingency Plan – Contact List of the Spill Contingency Plan is amended to include the correct contact for distribution of for spills at facilities authorized by the water license and include the Field Operations, On-call Inspector contact telephone number 867-975-4284.

Response: As per our annual report the volume of waste returning to Yellowknife is small. Maximum 15 gallons (sealed 5 gallon pails) at once. It will be stored in the generator room or will be stored on the fuel berm by the airstrip,

which is large enough to contain a minimum of 110% of the original vessel and 10% of the aggregate volume of all other vessels located in the containment.

Please refer to the spill contingency plan section 12 general procedures and Appendix G. The changes requested above have been made. Once we are at the lodge and have moved the lodge fuel berm to the new location above the 31 meter highwater, we can send you new photographs.

Please see revised fuel spill Table 1: Spill Contingency Plan – Contact List. We have made the above requested changes and included the on-call Inspector contact telephone.

An updated spill plan is attached.