

From: [Erika Nyssonen](#)
To: [Shannon Allerston](#); [Tyree Mullaney](#)
Subject: Fw: Giant Technical Expert - WL Review Questions
Date: September-09-19 2:23:15 PM

As mentioned this afternoon regarding Bill Slater's review of IR#1.

From: Bill Slater <bslater@bslater.ca>
Sent: Sunday, September 8, 2019 10:22 PM
To: nerds@northwestel.net; 'Kerry Penney'
Cc: 'Mohapatra, Asish (HC/SC)'; 'Irwin, Geneva (AADNC/AANDC)'; 'Braumberger, Aaron (AADNC/AANDC)'; Alex Lynch; 'Ben Nind'; 'Don Pittman'; Erika Nyssonen; 'Garbutt, Nicole (AADNC/AANDC)'; 'Gordon Hamre'; 'Jess Hurtubise'; 'Kateri'; 'Katharine Thomas'; 'Lena Black'; 'Gray, Leslie (EC)'; 'Michael Nabert'; 'Plato, Natalie (AADNC/AANDC)'; shin.shiga@nsma.net; 'William Lines'
Subject: Re: Giant Technical Expert - WL Review Questions

Hi Giant Mine Working Group,

I have reviewed the revised Closure Objectives and Criteria provided on September 3 by the GMRP in response to IR #1 from the MVLWB. The revised criteria have effectively addressed some of the comments on closure objectives and criteria that were provided in Section 6.0 of my May 25 Review of Post EA Information Package. Comments 4, 5, 9, 10, and 12 have been addressed by the changes provided.

As per my email of August 9, I will not be attending the workshop and technical session this week as I am currently out of the country.

Please let me know if you have any questions about my further review of the closure criteria.

Bill Slater
p. 867-633-8452
c. 867-334-2807

On 2019-05-25 17:15, Bill Slater wrote:

Hi Giant Mine Working Group,

Attached is a final version of my report following my review of the Post-EA Information Package for the GMRP. I've included PDFs of both clean and track changes versions of the report. This will allow you to see where I have made changes. If you need the MS Word version so that you can copy/paste, etc., please let me know.

Also, I am happy to discuss any of the content if you wish.

Bill Slater
p. 867-633-8452
c. 867-334-2807

On 2019-05-11 17:36, Bill Slater wrote:

Hi Again,

Please use this version - I forgot to include the Attachment at the back of the previous version. No other Changes.

Bill Slater
p. 867-633-8452
c. 867-334-2807

On 2019-05-11 17:29, Bill Slater wrote:

Hi Giant Mine Working Group,
Attached is a draft report that provides my response to the questions provided by Todd Slack - about the Post-EA Information Package submitted to the MVLWB. I welcome any comments or questions, but will want to finalize this by the end of day on Tuesday. Please get any comments back to me as soon as possible.
Thanks.

Bill Slater
p. 867-633-8452
c. 867-334-2807

On 2019-04-30 08:54, nerds@northwestel.net wrote:

Hi Bill.

During the last working group, following on the review of the different methods of your involvement, you asked for questions to be considered as part of the review. The following are intended to help support our review and understanding of the proposal and the results of its implementation.

1. Basic Foundation: From your understanding of the HHERA, what exposure scenarios did they work from? I've had a look and can't make heads or tails of what the words on the page translate to in a real world sense. Obviously, if the HHERA is being used as the backstop for saying

that the area outside the core industrial area is safe, this is based on some range of time and activities spent there. This in turn should have been incorporated into the land use constraints.

2. Changes in the project: Can you review the broad stroke changes from the DAR to the current proposal and evaluate whether they represent the same level of protection, a lesser level of protection or something in between? This includes not just the actual activities, but the goals and intent of the project. Finally, can you evaluate the Updated Project Description
3. Given that GNWT departments have refused to participate in the water licensing, can you identify areas where each of the departments/divisions would have been of value to the Land and Water Board Process? As examples, obviously Waters and wildlife, but the climate change folks in Environment. The folks in charge landfills and waste regulations (also environment I think), etc.
 - a. Obviously it's not reasonable to ask you to replace the work of dozens of GNWT staff.
4. Please review the engagement and document review approach proposed by the project. Do you believe that the combination of Annual Reports, the Annual Reviews, individual design and construction plans, construction

completion plans and performance review documents amounts to an efficient way to set criteria, establish monitoring and management, and then modify these aspects. Please use other projects that you are familiar with as benchmarks.

- a. Within this review, can you outline where you believe the appropriate home currently is for establishing a response framework (adaptive management), where and when it will be reviewed, and where it will live through Phase II and III.

5. Objectives and Criteria: Please review the list of Closure Components, Objectives and Criteria. In addition to a straightforward evaluation on the clarity and effectiveness to ensure an unambiguous and effective closure process, please extend your analysis completed in item 2 to these cornerstones. Has there been 'drift' from the intent of the DAR to these key aspects of the closure plan.

6. Within the proposal and the accompanying management plans, are there area of concern or improvements that can be made for either efficacy or clarity.

- a. Within this, can you focus on issues of site stability and monitoring? The proximity of the site to the neighbourhoods of Yellowknife mean that we need to have an appropriate warning system should any upset conditions be noted.

7. Dust Management Plan – Our review noted some concerns with the lack of a proactive approach to employing mitigations during wind events, both in terms of the lack of predictive tools, and the uncertainty around the utility of mitigations being considered within the different wind categories.

8. TDS – TDS has not been identified as a contaminant of concern. Our review notes that the levels being encountered are very high and seem to represent a concern. Please review the matter and provide further context on the issue, including potential impacts to the environment, any recommendations on impacts to water quality objectives relating to TDS (or its constituents) and the project's planned response to the matter.

9. Effluent and Sampling: This is beyond our expertise, though we have noted that selection of tests and appropriate procedures has been an issue of contention in other water licensing processes, with discussions and best practices often led by Waters (often with the GMRP consultant as the party contesting the conclusions). Given all the work being done to establish clear and effective documents, we also need to be sure that the testing regime is appropriately indicative of the events occurring in the receiving environment, at a frequency that allows for meaningful responses. In

your review of the WL application can
you please provide feedback on the
sampling effort and procedures.

We look forward to your review and
comments. Should you want any further
clarification, please don't hesitate to ask.

Todd Slack
Northern Environmental Research &
Development Services
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