

## MVLWB Permits

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**From:** Tyree Mullaney <tyree@mvlwb.com>  
**Sent:** Tuesday, December 10, 2013 11:18 AM  
**To:** 'Permits'  
**Subject:** FW: Alternatives North Comment Letter on 2013 Contingency Securement of Tarping Roaster Waste  
**Attachments:** AN Comment Letter on Tarping of Roaster Waste.pdf  
**Importance:** High

MV2012L8-0010

[Reports and Studies](#)

[Other](#)

**From:** kevin o'reilly [mailto:kor@theedge.ca]  
**Sent:** December 3, 2013 11:43 PM  
**To:** Adrian Paradis  
**Cc:** esangris@ykdene.com; ebetsina@ykdene.com; mheyck@yellowknife.ca; aehrlich@reviewboard.ca; Stuart.Niven@dfo-mpo.gc.ca; Katherine.Silcock@aadnc-aandc.gc.ca; gordon.hamre@gmail.com; tyree@mvlwb.com  
**Subject:** Re: Alternatives North Comment Letter on 2013 Contingency Securement of Tarping Roaster Waste  
**Importance:** High

Adrian

Please see the attached comment letter on the proposal to cover the Giant Mine bagged roaster complex waste with tarps. We look forward to AANDC's responses.

Kevin O'Reilly  
Alternatives North

PS Tyree, please file this letter on the MVLWB public registry. Alan, please file this letter on the Review Board public registry. Thanks.

----- Original Message -----

**From:** Adrian Paradis <[Adrian.Paradis@aadnc-aandc.gc.ca](mailto:Adrian.Paradis@aadnc-aandc.gc.ca)>  
**Date:** Monday, December 2, 2013 11:05  
**Subject:** Re: Fw: Request for Input: 2013 Contingency Securement of Tarping Roaster Waste  
**To:** kevin o'reilly <[kor@theedge.ca](mailto:kor@theedge.ca)>  
**Cc:** Katherine Silcock <[Katherine.Silcock@aadnc-aandc.gc.ca](mailto:Katherine.Silcock@aadnc-aandc.gc.ca)>, [gordon.hamre@gmail.com](mailto:gordon.hamre@gmail.com), [tyree@mvlwb.com](mailto:tyree@mvlwb.com)

> Kevin,

>

> Attached. How is Friday for comments?

>

> Adrian

>

> >>> kevin o'reilly <[kor@theedge.ca](mailto:kor@theedge.ca)> 11/29/2013 8:42 AM >>>

> Yes, please send to me.

>

> ----- Original Message -----

> From: Adrian Paradis <[Adrian.Paradis@aadnc-aadnc.gc.ca](mailto:Adrian.Paradis@aadnc-aadnc.gc.ca)>

> Date: Friday, November 29, 2013 5:46

> Subject: Fw: Request for Input: 2013 Contingency Securement of Tarping Roaster Waste

> To: [kor@theedge.ca](mailto:kor@theedge.ca)

> Cc: Katherine Silcock <[Katherine.Silcock@aadnc-aadnc.gc.ca](mailto:Katherine.Silcock@aadnc-aadnc.gc.ca)>, [gordon.hamre@gmail.com](mailto:gordon.hamre@gmail.com),  
> [tyree@mvlwb.com](mailto:tyree@mvlwb.com)

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> <!--[if mso 9]--> <!--[endif]-->

> > Kevin,

> >

> > When wrapping up the comments on the attached update to the Contingency Securement of Tarping Roaster Waste we noticed that we sent the material to Gordon but missed you. Would you like an opportunity to comment? If so, I will send the original email with attachments to you on Monday as I am travelling today and cannot access the attachment via BB. It is a short update (approx. 3-4 pages).

> > Adrian

> >

> > Adrian

> >

> > >>> "Niven, Stuart" <[Stuart.Niven@dfo-mpo.gc.ca](mailto:Stuart.Niven@dfo-mpo.gc.ca)> 11/14/2013 6:22:00 PM >>>

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>> The Fisheries Protection Program of DFO has no issues.? ?Please be aware that Morag with FSCAP very well may have input.

>>

>> **Stu Niven**

>> Senior Fisheries Protection Biologist

>> Central and Arctic Region | R??ion Centrale et de l'Arctique

>> Fisheries and Oceans Canada | 301-5204 50th Ave, Yellowknife, NT, X1A 1E2

>> P??hes et Oc??ns Canada | 301-5204 50<sup>e</sup> Ave, Yellowknife, T.N.-O, X1A 1E2

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>> General Contact Number: **1-855-852-8320**





# *Alternatives North*

December 3, 2013

Adrian Paradis  
Regulatory Manager  
Giant Mine Remediation Project  
Aboriginal Affairs and Northern Development Canada  
P.O. Box 1500  
Yellowknife NT  
X1A 2R3

## **Re: 2013 Contingency Securement—Tarping Arsenic Impacted Waste**

Thank you for the opportunity to review AANDC's proposal for the use of tarps to cover arsenic contaminated waste from the Giant Mine Roaster Complex Deconstruction as received by e-mail yesterday.

The deconstruction of the roaster complex is the most important work to take place during the surface remediation of the Giant Mine on the most contaminated portion above ground. This work should proceed on an emergency basis, provided that there is sufficient justification, rigorous monitoring and public engagement (including public reporting).

We are concerned with several aspects of this proposal for tarping. The original Giant Mine Roaster Complex Deconstruction Waste Management Plan dated April 2013 stated "Several temporary storage buildings will be erected to satisfy the space requirements for the hazardous waste containers" (page 39). Then it stated "Steel shipping containers may also be used as an alternative protection measure for some of the hazardous waste". Covering the arsenic contaminated waste with tarps was not mentioned as a contingency.

We understand that the Roaster Complex Deconstruction activities were completed for 2013 in mid-November. We question why AANDC is applying to the MVLWB at this point when winter conditions are clearly present with temperatures of -25 C and an accumulated snow depth of approximately 20 cm, as it appears to be too late to implement any other measures.

1. What steps did AANDC take to secure temporary storage buildings as described in the Waste Management Plan? Having failed to secure temporary storage buildings, what steps were taken to secure enough steel shipping containers? Please include a timeline for these efforts.

2. Please provide a risk assessment of the three alternatives (temporary buildings, steel shipping containers and tarp cover) for the temporary storage of the arsenic contaminated waste. Please provide the cost of each alternative.
3. Has AANDC begun to cover any bagged arsenic-impacted wastes with tarps as of the date of this letter? If not, what measures are currently in place to protect the wastes beyond the bags in which they are stored and the pallets upon which the bags rest?
4. Please indicate how many shipping containers are currently at the site and how many bags may already be stored in them. Please provide the amount of tarping that will be required, the number of bagged waste containers to be covered in this manner, and the % of overall bagged waste containers to be stored in this manner vs. those in storage in shipping containers.
5. Please explain what will eventually happen with the tarps. Will they need to be disposed of as potentially arsenic contaminated waste and where?
6. Will any current snow load on the bagged waste containers be removed now and how will that be accomplished?
7. Are there other kinds of tarps or covers that may provide greater protection from the elements?
8. How long will the tarps be used? Just until the spring of 2014 or for several or more years until there is a final disposal option identified as part of the overall remediation of the site?
9. Monthly visible inspections are described as the method of monitoring the use of the tarps. We would suggest that the frequency of inspections needs to be increased to at least weekly, if not daily, when the temperature approaches -5 C and higher, especially during freshet. We understand that the surface of the storage area and any runoff are to be managed as water requiring storage and treatment. However, we wonder whether other types of monitoring, especially at freshet, might be useful in detecting potential leakages or spills such as seepage samples or snow monitoring.

We look forward to full and detailed responses from AANDC.

Sincerely,



Kevin O'Reilly  
Giant Mine Coordinator

- cc. Chiefs Edward Sangris and Ernest Betsina, Yellowknives Dene First Nation  
Mayor Mark Heyck, City of Yellowknife  
Tyree Mulaney, Mackenzie Valley Land and Water Board  
Stu Niven, Fisheries and Oceans Canada  
Alan Ehrlich, Mackenzie Valley Environmental Impact Review Board