

MVLWB Permits

From: Tyree Mullaney <tyree@mvlwb.com>
Sent: Thursday, January 23, 2014 8:50 AM
To: permits@mvlwb.com
Subject: FW: RE: Request for Input: 2013 Contingency Securement of Tarping Roaster Waste

MV2012L8-0010 – AANDC CARD-Waste MGMT Plan – Comments_AN-AANDC_Jan21_14

Management Plan – Waste Management Plan

From: Adrian Paradis [mailto:Adrian.Paradis@aandc-aadnc.gc.ca]
Sent: January 21, 2014 3:30 PM
To: Katherine Ross; tyree@mvlwb.com; Kevin O'Reilly
Subject: Fwd: RE: Request for Input: 2013 Contingency Securement of Tarping Roaster Waste

Kevin,

Here is the original email from Johanne, YKDFN for the tarping. If you need more information please let me know.

Adrian

>>> Johanne Black <jblack@ykdene.com> 11/20/2013 11:33 AM >>>

Hello Adrian,

Yellowknives Dene First Nations' Giant Mine Advisory Committee has reviewed the below sent documents and are requesting the following measures be implemented within the winter containment procedures stated within document titled "Roaster Complex Deconstruction Waste Management Plan Insert":

Prior to tarping the bags, the bags will be ~~either be placed on a wooden pallet or placed on a geomembrane~~ in order to prevent the bags from being in direct contact with the ground or other surface **other than the pallet.**

Reasons being: If the mega-bags are directly sitting on a geomembrane instead of on a pallet, then chances are, during its eventual move into a marine shipping container, it will be by means of slinging the mega-bags into the outer means of containment and not by lifting the pallet that has the mega-bag resting on it. This change to the method will decrease the chance of bags being ripped open during its eventual move into a marine shipping container in the event of mega-bag handles being faulty during the mega-bags sling to a marine shipping container if not on a pallet. This will also decrease the chance of the bags being ripped open during the freeze thaw cycle in the 2014 spring season as the bags may freeze to surfaces. During springtime the bags will form condensation on the outside of the bags during melting temperatures and may freeze to surfaces during cooler conditions experienced at night and may not thaw from surface during the move.

This measure will provide an added level of assurance in keeping the bags integrity during its eventual move.

Another concern brought up: YKDFN is requesting assurances as to the proponent notifying the care and maintenance contractor that they (C&M contractor) are the ones responsible for the general site observations and maintenance of the contaminated storage area. Is this duty currently being done by the care and maintenance contractor for the current storage of mega-bags? Has this hazardous waste storage area content information been provided to the local Fire Department for emergency planning and response purposes?

Another concern: Will this hazardous waste storage compound need to be registered with NWTs Environmental Protection Services? As hazardous waste management facilities may require registration with Environmental Protection Services as seen in the following applicable hazardous waste guideline titled 'Guideline for the General Management of Hazardous Waste in the NWT' section 3.4-Registering a Hazardous Waste Management Facility. Hazardous waste management facilities may require registration with Environmental Protection Services if:

- The facility is used or is intended for the storage of hazardous waste for a period of 180 days or more, and (YKDFN is not sure if storage of hazardous waste will exceed 180 days).
- Quantities to be stored exceed the quantities set out in Schedule I for individual waste classes or if the aggregate quantity for all classes of waste stored exceed 5000 Kg/L (YKDFN does not know what waste quantities are currently being stored or will be eventually stored).

Thank-you,

Johanne Black
Community Liaison/Technical Advisor
Giant Mine Advisory Committee

Yellowknives Dene First Nation
Land & Environment Dept.
PO Box 2514
Yellowknife, NT
X1A-2P8
Ph: 867-766-3496 ext 104
Fax: 867-766-3497

From: Adrian Paradis [<mailto:Adrian.Paradis@aandc-aadnc.gc.ca>]
Sent: November 13, 2013 5:03 PM
To: Morag McPherson; stuart.niven@dfo-mpo.gc.ca; Amy.Sparks@EC.gc.ca; gordon.hamre@gmail.com; reganalyst@nsma.net; cgreencorn@yellowknife.ca; Dennis Kefalas; walexander@yellowknife.ca; Johanne Black
Cc: Katherine Silcock; Anne-Marie Guedon; Jane Amphlett; Lisa Colas; Nahum Lee; Erika Nyyssonen; jpotten@mvlwb.com; permits@mvlwb.com; tyree@mvlwb.com; Brad Thompson; David.Hango@pwgsc-tpsgc.gc.ca; mark.palmer@pwgsc.gc.ca
Subject: Request for Input: 2013 Contingency Securement of Tarping Roaster Waste

Greetings,

The Giant Mine Project Team will be requesting approval from the Mackenzie Valley Land and Water Board (MVLWB) to have tarping added to the winter containment procedures for arsenic impacted waste described in the approved Roaster Complex Deconstruction Waste Management Plan.

Prior to applying to the MVLWB, the Project Team is seeking your input on the proposed tarping, which is explained in the attached insert. The insert has been prepared to be a stand-alone section in the approved WMP and will become Section 2.4.7.1 in the WMP once any input has been addressed. Please provide your comments by November 22, 2013.

Should you require any additional information or have any questions, please contact Adrian Paradis, Regulatory Manager, Giant Mine Remediation Project at (867) 669-2425 or by email at Adrian.paradis@aandc-aadnc.gc.ca.

Sincerely,

Adrian Paradis
Regulatory Manager
Giant Mine Remediation Project
Aboriginal Affairs and Northern Development Canada