

MVLWB Permits

From: Tyree Mullaney <tyree@mvlwb.com>
Sent: Thursday, February 27, 2014 9:26 AM
To: 'MVLWB Permits'
Subject: FW: Responses to my questions (Corrected)
Attachments: avast info.txt; avast info.htm

MV2012L8-0010 – AANDC – CARD – Roaster Waste Management Plan – Revision 1 – request for clarification and response_Feb26_14

Management Plans – Waste Management Plan

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From: Adrian Paradis [mailto:Adrian.Paradis@aandc-aadnc.gc.ca]
Sent: February 26, 2014 1:26 PM
To: Tyree Mullaney
Subject: Re: Responses to my questions (Corrected)

Hi Tyree,

Please see our responses in [blue](#) below. I hope these clarify your questions.

1) Alternatives North 2 – what is the reasoning as to why AANDC can't perform more frequent inspections? (i.e. every three days). The current method of storage of the waste and the completion of regular inspections is consistent with the requirements listed in the Guidelines for the General Management of Hazardous Waste in the NWT and is of greater frequency for the completion of inspections on other hazardous materials storage facilities (e.g. PCB Regulations). The frequency of the inspections will be adjusted if there is a change in conditions and if deemed appropriate for the safe operation of the site (i.e. in the event of the change of site conditions or due to storm events). As noted in the original response in addition to routine inspections, site security conducts regular patrols over the entire site, which includes the area of the MSA.

2) Alternatives North 3 & North Slave Metis Alliance 1 – when will the “temporary” arsenic impacts waste be at its final destination?

The storage containers will remain undisturbed in their current location until a means of storage for the 2014 season is available onsite. Providing a specific date to have the arsenic waste move is difficult due to a variety of factors including procurement, timing of delivery, onsite placement and construction time, etc. If shelter buildings are re-evaluated as the preferred option the delivery and construction of the shelter may not occur until September. Until the final method of containment is decided the containers should remain in place to ensure their integrity. Moving the containers before or during the freshet is problematic as some of the bags may still be in a frozen state, which makes them harder to handle and introduces more risks during the transfer of the bags.

As noted in the original response, the geomembrane will protect the wastes in a similar fashion as a soft sided structure or marine container in that it will protect the bags from weather elements: sunlight (ultraviolet radiation), precipitation, and wind.

- 3) Alternatives North 7 – please provide dates as to when the contract was tendered and when the contract was awarded.

Below is a timeline of events that lead up to the use of geomembranes:

- On March 12, 2013, the Roaster Complex Deconstruction contract was awarded to Parsons Canada Limited (Parsons). Parsons proposed TDG compliant bags to containerize the arsenic waste generated for the deconstruction of the Roaster.
- In May of 2013, as due diligence measures and considering these bags would likely be stored for an extended period of time, it was determined by the Giant Mine Project team that the waste bags be placed into temporary shelters as an added measure against weathering.
- In August 2013 following design, the tendering for the temporary shelter buildings began and closed. However, the results of the public tender yielded no contractor who could meet the project requirements.
- In September 2013, the Roaster Complex deconstruction contractor was then hired to obtain marine shipping containers, haul them to the Material Storage Area and fill them with the bagged arsenic waste. Shipping containers were also an approved method of storage of the waste.
- 70 shipping containers were ordered and the full order did not arrive on-site until November.
- Due to an unexpected increase in waste quantities removed late in the 2013 construction season and due to time limitations with trying to procure all of the necessary additional shipping containers to store these additional quantities, not all of the bagged waste could be placed in containers by the end of the 2013 season.
- In late October/ early November the Roaster Complex deconstruction contractor started overlying geomembranes on the TDG compliant bagged waste until such time they can be stored in a method that is consistent with the Water Management Plan.

- 4) Alternatives North 10 – how will the tarping materials be cleaned? What are the standards for decontamination?

If required, the cleaning methods will follow the procedures presented in the Waste Management Plan. The methods are expected to be consistent with the methods to clean/decontaminant materials removed from the Roaster complex structures. These methods utilize; removing bulk materials, vacuuming and washing. If the material cannot be cleaned, it will be disposed of as arsenic impacted waste. The Roaster Complex contract specifications contain standards for decontamination and the containerization/disposal requirements for material that cannot meet those standards. The standards that will be used to confirm the geomembrane cover materials have been cleaned will include:

1. Visual Inspections
2. Surface wipe checks
3. Guidelines for Industrial Waste Discharges in the NWT to confirm if waste contains contaminants above landfill disposal guidelines.

Adrian

>>> "Tyree Mullaney" <tyree@mvlwb.com> 2/24/2014 1:09 PM >>>
Hi Adrian,

Board packages are due today. I was wondering if you have your responses to me questions that was send to you last week. If not the Plan will go to the Board meeting at the end of March or the first part of April...

Thanks

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Tyree Mullaney

Regulatory Officer

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