



**Mackenzie Valley Land and Water Board**  
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July 18, 2019

File: MV2019X0004

Ms. Deniz Baykal  
A/Manager, Environmental Programs  
Environment and Climate Change Canada  
351 Boul. Saint-Joseph  
GATINEAU QC K1A 0H3

Email: deniz.baykal@canada.ca

Dear Ms. Baykal:

**Management Plans (Waste Management Plan, Spill Contingency Plan, and Engagement Plan) – Version 3 – Resubmission required**  
**Environment and Climate Change Canada – Fort Reliance, NT**

The Mackenzie Valley Land and Water Board (MVLWB or the Board) met on July 18, 2019 to review your Management Plans (Waste Management Plan, Spill Contingency Plan, and Engagement Plan), Version 3, which were revised and re-submitted to fulfill Conditions 71, 72, and 76 of Permit MV2019X0004 for Board decision.

The Board requires that Environment and Climate Change Canada resubmit the three Management Plans (Waste Management Plan, Spill Contingency Plan, and Engagement Plan), Version 3, in accordance with comments made during this review as summarized in Tables 1-3 (attached), by **July 30, 2019**. These Plans will be considered to be approved, conditionally upon receipt of this information and written conformity of confirmation from Board staff.

If you have any questions or concerns, please contact David Finch at (867) 766-7467 or email [dfinch@mvlwb.com](mailto:dfinch@mvlwb.com).

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Mavis Cli-Michaud".

Mavis Cli-Michaud  
MVLWB, Chair

Copied to: Distribution List  
Rick Hoos, Principal Consultant, TetraTech

Attached: Table 1: Waste Management Plan (WMP), Version 3, Outstanding Revisions  
Table 2: Spill Contingency Plan (SCP), Version 3, Outstanding Revisions  
Table 3: Engagement Plan (EP), Version 3, Outstanding Revisions

**Table 1: MV2019X0004 - Waste Management Plan (WMP), Version 3, Outstanding Revisions**

<b>Components of the Plan required by Board in letter of May 1, 2019</b>	<b>Current Location of Information</b>	<b>Outstanding Revisions</b>
Details regarding the proposed open burning of waste	WMP v3, sections 2.3, 3.2 (Table 1), 4.3.2	Include a separate subsection outlining burning methods and locations.
Details on purge water management	Email of July 5, 2019	Management methods include long-term monitoring and direct management via addition of peroxide (to break down hydrocarbons).  Revise WMP to state explicitly. This would help to understand mitigation of groundwater issues in AEC 1, 5 and 6 (see WMP v3, section 3.2, Table 1).
Details on contaminated soil storage	Email of July 5, 2019 (re: WMP, bullet 2)	Revise WMP to include details on contaminated soil storage
Details on final soil quality criteria	Response to MVLWB 1 in MV2019X0004 review (Review Comments Table, April 18, 2019)	Revise WMP to include soil quality criteria.
Details on the condition of the former tank farm liner and mitigation measures, as applicable	Email of July 5, 2019 (re: WMP, bullet 4)	Revise to include rationale in body of WMP.

**Table 2: MV2019X0004 - Spill Contingency Plan (SCP), Version 3, Outstanding Revisions**

<b>Components of the Plan required by Board in letter of May 1, 2019</b>	<b>Current Location of Information</b>	<b>Outstanding Revisions</b>
Information on the storage and management, including spill response scenarios for contaminated soils	Email of July 5, 2019 (re: WMP, bullet 2)	Revise SCP to include information on storage and management of contaminated soils, including response scenarios.
Information on the storage and management, including spill response scenarios for hydrogen peroxide solutions	Response to MVLWB 1 in MV2019X0004 review (April 18, 2019)	Revise SCP to include peroxide storage and management. This should make direct reference to response scenarios.
Information on the storage and management, including spill response scenarios for purge waters	Email of July 5, 2019  Also referenced in SCP Version 3, section 5.1 (Table 3)	Email of July 5, 2018, states that contaminated purge water (= groundwater) will be managed by oxidizer treatment and long-term monitoring.  Revise SCP to state this explicitly.  Revise SCP to address storage and management of contaminated purge water / groundwater. This could make direct reference to response scenarios.

All appropriate MSDS sheets		All present in Version 3 <u>except</u> hydrogen peroxide. This was present in Version 2, but absent in this revision.	Revise SCP to include all MSDS, including Hydrogen peroxide and/or other oxidizers. Please migrate any relevant sheets from Version 2 to Version 3.
Other commitments made during review		Current Location of Information	Outstanding Revisions
MVLWB 1	Provide notification to local communities (i.e. LKDFN) in event of a spill (see EP v3 section 2.4.3)	Email of July 5, 2019  EP v3, section 2.4.3	ECCC committed to community spill notification in Engagement Plan v3 section 2.4.3.  Revise WMP v3 section 5.3 and Appendix 6 to include local notification.

**Table 3: MV2019X0004 - Engagement Plan (EP), Version 3, Outstanding Revisions**

Components of the Plan required by Board in letter of May 1, 2019	Current Location of Information	Outstanding Revisions
Radiation survey results	Memo of May 30, 2019  Email of July 5, 2019	Revise to include an overview of results in the WMP, even if radiation is not a concern.  Preliminary results have already been shared with the Board. Please update the Board when final results are available.