



Sahtu Land and Water Board

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December 2, 2015

[S09D-001/S15L8-001](#)

Alison Heslep
Project Officer
Aboriginal Affairs and Northern Development Canada
Contaminants and Remediation Directorate
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Dear Ms. Heslep

**RE: S09D-001/S15L8-001 - Great Bear Lake Remediation Project – Deline District
SLWB Submission Requirements for Terra Mine Barrel Cleanup**

This letter is follow up from your call on December 1st, 2015 requesting clarification of AANDC-CARD's required regulatory submissions to the Board in anticipation of the proposed Barrel Cleanup project to be initiated in 2016 at Terra Mine.

As discussed, the [July 24, 2015 Water Licence Issuance Letter](#) for S15L8-001 clearly stated that a Waste Management Plan and updated (i.e. site specific) Spill Contingency Plan are expected to be submitted to the Board for approval prior to the commencement of site activities. It is also anticipated that an updated Engagement Plan would be submitted within a comparable timeframe.

The terms and conditions of Land Use Permit S09D-001 were not changed as part of the extension process in June 2015. The LUP contains two conditions related to Camp Locations (1.5 and 1.10) requiring that the Permittee use existing campsites, where they exist and that all campsites shall be located a minimum of 100 metres from the high water mark of any water body. The Application had indicated that permanent camps would be required and set up in relatively close proximity to the remedial work, with potential for temporary camps also. It would be anticipated that the camp to be established for the Barrel Cleanup work would be located on previously disturbed lands however not necessarily using the existing Terra infrastructure. Should AANDC-CARD have any concern with proposed camp locations by a Contractor meeting the LUP requirements, it would be advised that the site selection be discussed with the Inspector and the SLWB be kept informed.

With respect to erosion control measure requirements associated with a barge landing (i.e. potential upgrades along shoreline), an Erosion Control Plan is not required however the LUP requires the Permittee to install erosion control structures as the land use operation progresses, unless otherwise authorized by the Land Use Inspector (6.15) while the WL does not contain any condition specific to erosion control except in consideration of stream crossings and final Abandonment and Restoration activities. The activity would be considered an alteration of the bank of a watercourse and best management practices would be anticipated that control sedimentation as described in the LUP Application (pg. 27) indicating that potential impacts associated with suspended solids would be controlled through the use of sediment curtains in all areas where shoreline work is performed. The Application also references the Water Quality Monitoring Program (WQMP) which specifies

that monitoring would occur in and around the silt curtains. It should also be noted that the LUP also requires that the Permittee use portable ramps during loading or unloading of ships or barges (3.5).

We had also previously discussed if AANDC-CARD should submit an amendment request to address concern with the Water Bucket LUP Condition (3.9). I also note that in the [July 2015 Inspection Report](#), the Inspector had requested a detailed plan outlining the drum consolidation program for Terra Mine which has not been shared with the Board. Although the activities are expected as part of the overall Great Bear Lake (GBL) Remediation Program, the proposed Barrel Cleanup Program does not quite fit into the GBL Remediation Program as described in the Application (i.e. Phase I, II, III) which is what is authorized by the current WL and LUP. My understanding is that the entire remediation as described in the Application is under indefinite review and that this Barrel Cleanup Program is a risk management response to recent inspections (i.e. [August 26, 2015](#)) as well as changes to the Northern Contaminated Sites Program as described in AANDC-CARD's [November 4th letter](#) with Project Status Update and Request for Extension to the WQMP deadline. The requested detailed plan should also be part of an amendment request as the scope of the Program is changing.

It would be beneficial to set up a conference call between ourselves and the Inspector to improve our understanding of the proposed scope for the GBL Remediation Program, specifically within the time frame of the current authorizations (expire July 23, 2017), to ensure we all have a clear expectations of requirements moving forward.

If you have any questions or concerns, please contact me at (867) 598-2413 ext. 224 or email at sabrina.sturman@slwb.com.

Sincerely,



Sabrina Sturman
Regulatory Specialist
Sahtu Land and Water Board

cc: Julie Ward, Project Manager, AANDC-CARD
Tim Morton, Resource Management Officer, AANDC