

## Review Comment Table

<b>Board:</b>	WLWB
<b>Review Item:</b>	Platinum Group Metals Ltd. - Providence Lake Project - Waste Management, Spill Contingency, and Engagement Plans (W2015C0008)
<b>File(s):</b>	<a href="#">W2015C0008</a>
<b>Proponent:</b>	Platinum Group Metals
<b>Document(s):</b>	<a href="#">Waste Management Plan Version 2.0</a> (390 KB) <a href="#">Spill Contingency Plan Version 2.0</a> (1 MB) <a href="#">Engagement Plan Version 2.0</a> (269 KB)
<b>Item For Review Distributed On:</b>	Mar 1 at 14:52 <a href="#">Distribution List</a>
<b>Reviewer Comments Due By:</b>	Mar 24, 2016
<b>Proponent Responses Due By:</b>	Mar 31, 2016
<b>Item Description:</b>	<p>Platinum Group Metals Ltd. (PGM) submitted Version 2.0 of its Waste Management Plan, Spill Contingency Plan, and Engagement Plan to the Wek'eezhii Land and Water Board (WLWB or the Board) on February 23, 2016. PGM submitted these management plans in response to the Board's September 24, 2015 <a href="#">issuance</a> letter of Land Use Permit W2015C0008.</p> <p>The Board requested that Platinum Group Metals Ltd. incorporate a triggers table and its conflict resolution process, as well as any additional updates, in Version 2.0 of the Engagement Plan. Platinum Group Metals Ltd. is also required to include commitments made during the land use permit renewal review process in Version 2.0 of their Waste Management Plan and Spill Contingency Plan.</p> <p>Reviewers are invited to submit comments and recommendations on Version 2.0 of all three of these plans via the WLWB's Online Review System prior to the reviewer comment deadline.</p>
<b>Contact Information:</b>	Elissa Berrill 867-765-4581 Jessica Pacunayen

## Comment Summary

Environment and Climate Change Canada: Melissa Pinto				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
1	General File	<b>Comment</b> <a href="#">(doc)</a> ECCC Cover Letter <b>Recommendation</b>		
2	Spill Contingency Plan - Off-site Resources	<b>Comment</b> Platinum Group Metals Ltd. (the Proponent) listed an incorrect contact number (867-669-4725) for Environment and Climate Change Canada (ECCC). <b>Recommendation</b> In the case of a spill or emergency, the 24 Hour Northwest Territories Spill Report Line should be contacted first by the Proponent, who will then involve ECCC Emergencies when appropriate. For information relating to the environmental enforcement and reporting requirements under the Canadian Environmental Protection Act and the Fisheries Act please contact ECCC Environmental Enforcement at 867-669-4730. The ECCC National Environmental Emergencies Centre (NEEC) will provide technical and scientific environmental advice and assistance to the lead agency, in the event of an environmental emergency. A lead agency is described as the governmental authority that regulates or has authority over the activity from which the emergency originated. NEEC can be contacted at 1-866-283-2333.	<b>Apr 12:</b> The Spill contingency Plan will be updated with the correct contact number for ECCC Environmental to 867-669-4730 and note that it is the Northwest Territories Spill Report Hot Line is the first to be contacted in the case of a reportable spill and is considered the lead agency through which advice is to be requested.	
3	Waste Management Plan - Greywater Sump	<b>Comment</b> The Waste Management Plan indicates that the greywater sump pit will be treated with lime or bleach to kill	<b>Apr 12:</b> The treatment of greywater with lime or bleach will be removed from the waste management plan. In practice no	

		odours. <b>Recommendation</b> There should be minimal addition of any reagents to the sump to allow natural degradation processes to operate. The Proponent should investigate alternatives to control odour.	additives have ever been added to the sump greywater as it drains easily into the gravel. In addition, the lid keeps any odor in so it has not been a issue.	
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**GNWT - ENR: Central Email GNWT**

ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
1	General File	<b>Comment</b> <a href="#">(doc)</a> ENR Letter - No Comment or Recommendations at this time. <b>Recommendation</b>		

**WLWB: Jessica Pacunayen**

ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
1	General	<b>Comment</b> In review of PGM’s Version 1.0 of the Spill Contingency Plan, PGM responded to the GNWT (GNWT-ENR ID-7) that “all work must stop until spill has been cleaned up.” There is no mention of this part of the procedure in Version 2.0 of the Spill Contingency Plan. <b>Recommendation</b> Could PGM please clarify whether or not all work will stop should a spill occur?	<b>Apr 12:</b> The Spill contingency Plan in version 2.0 will be updated to include the statement that all work will stop until the spill has been cleaned up as it was in Version1.0. It is the intention that all work will stop in the case of a spill, and only commence once the spill has been cleaned up.	
2	General	<b>Comment</b> In review of version 2.0 of the Waste Management Plan, PGM states that construction waste and other waste material and recyclables will be separated and transported to an approved waste receiving facility. <b>Recommendation</b> Can PGM confirm this includes scrap metal, discarded machinery, parts, tires, and drums? If not, can PGM	<b>Apr 12:</b> The proponent confirms that scrap metal, discarded machinery, part, tires and drums are considered recyclables and that these item are seperated out and transported to an approved recycling or waste receiving facility.	

		please describe how these types of waste are managed?		
3	General	<p><b>Comment</b> Section 3) iii) c) of Version 2.0 of the Spill Contingency Plan, PGM has identified a “contingency plan” will be implemented “in case spill worsens beyond control or if the weather or topography impedes containment.”</p> <p><b>Recommendation</b> Is PGM referring to the Version 2.0 Spill Contingency Plan or is there a separate contingency plan for these cases. If the latter, could PGM please describe its contingency?</p>	<p><b>Apr 12:</b> The "contingency plan" referred to is indeed the Spill Contingency Plan V2.0 and refers to activating further response as per the action plan. For example if the weather or topography impedes containment the proponent will seek further advice from the lead agency (GNWT) that would then contact the ECCC for advice on environmental emergencies. The intent is to stick to the contingency plan until the spill has been cleaned up.</p>	



Environment and  
Climate Change Canada

Environnement et  
Changement climatique Canada

Environmental Protection Operations Directorate  
Prairie & Northern Region  
5019 52<sup>nd</sup> Street, 4<sup>th</sup> Floor  
P.O. Box 2310  
Yellowknife, NT X1A 2P7

March 22, 2016

ECCC File: 5100 000 069/001  
WLWB File: W2015C0008

Elissa Berrill  
Regulatory Specialist  
Wek'eezhii Land and Water Board  
1-4905 48<sup>th</sup> Street  
Yellowknife, NT X1A 3S3

Via online submission

**RE: W2015C0008 – Platinum Group Metals Ltd. – Providence Lake Project – Spill Contingency and Waste Management Plans (Version 2)**

Attention: Elissa Berrill

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Wek'eezhii Land and Water Board regarding the above-mentioned management plans. ECCC's specialist advice is provided based on our mandate, in the context of the *Canadian Environmental Protection Act*, the pollution prevention provisions of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

Should you require further information, please do not hesitate to contact me at (867) 669-4733 or [Melissa.Pinto@canada.ca](mailto:Melissa.Pinto@canada.ca).

Sincerely,

Melissa Pinto  
Environmental Assessment Coordinator

Attachment(s): ECCC Comments Excel Sheet

cc: Wade Romanko, Head, Environmental Assessment North (NT and NU)

**Canada**

[www.ec.gc.ca](http://www.ec.gc.ca)

March 24, 2016

Violet Camsell-Blondin  
Chair  
Wekeezhii Land and Water Board  
#1-4905 48<sup>th</sup> Street  
Yellowknife, NT  
X1A 3S3

Dear Ms. Camsell-Blondin,

**Re: Fortune Minerals  
Land Use Permit – W2015C0008  
Waste Management, Spill Contingency, and Engagement Plans  
Providence Lake Project  
Request for Comment**

The Department of Environment and Natural Resources, Government of the Northwest Territories, has reviewed the documents at reference based on its mandated responsibilities under the *Environmental Protection Act*, the *Forest Management Act*, the *Waters Act*, the *Forest Protection Act* and the *Wildlife Act* and has no comments or recommendations for the consideration of the Board at this time.

Should you have any questions or concerns, please do not hesitate to contact Patrick Clancy, Environmental Regulatory Analyst at (867) 767-9233 Ext: 53096 or email [patrick.clancy@gov.nt.ca](mailto:patrick.clancy@gov.nt.ca).

Sincerely,



Patrick Clancy  
Environmental Regulatory Analyst  
Environmental Impact Assessment Section  
Conservation, Assessment and Monitoring Division  
Department of Environment and Natural Resources  
Government of the Northwest Territories