



Mackenzie Valley Land and Water Board
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October 7, 2019

File: MV2014F0013 MV2014L8-0006 MV2019L8-0002

Mr. David Harpley
Canadian Zinc Corporation
Suite 1710-650 West Georgia Street
P.O. Box 11644
Vancouver BC V6B 4N9

Email: David.Harpley@norzinc.com

Dear Mr. Harpley:

Information Request – Waste Management Plan – Prairie Creek All Season Road Project

The Mackenzie Valley Land and Water Board (MVLWB/Board) staff have reviewed Canadian Zinc Corporation's (CZN) responses to reviewer comments on the Online Review System (ORS) regarding the Prairie Creek All Season Road Project (Project) Applications for Land Use Permit [MV2014F0013](#) and Water Licences [MV2014L8-0006](#) and [MV2019L8-0002](#). Board staff have determined that more information is required in order to continue with the regulatory process.

Throughout the regulatory proceeding, Board staff and reviewers have requested more details regarding CZN's proposed sewage disposal methods (see comments: ENR 121-122; MVLWB 18; Parks Canada 128-129, 132-134; Racher 12-13 on the [ORS Public Review dated May 15, 2019](#), and pages 10-15 of the [Technical Session Transcript dated June 7, 2019](#)). During the public review of the Draft Permit and Licence Conditions, Board staff reiterated that more information on CZN's proposed sewage disposal methods was required in order to draft the conditions and, at that time, recommended CZN provide clarification (see comment MVLWB 2 and 4 on the [ORS Public Review dated September 9, 2019](#)). As indicated in MVLWB 2:

Section 3.5 of the Waste Management Plan explains that "sewage and grey water from the construction camps will either be treated on-site (larger camps) with disposal of effluent via septic fields or taken to the Mine for treatment. Sewage from maintenance camps will either be taken to the Mine or disposed of in pit latrines. Maintenance camp wash water will be handled as for construction camps." Board staff require information on CZN's method of disposal for sewage in order to draft Licence and Permit conditions, definitions (e.g. Waste Disposal Facilities), Surveillance Network Program (Annex A), and Effluent Quality Criteria (EQC) (Part F, condition 22). EQC may be considered if there is any deposit of waste on site and has been included in the draft water licences.

In response, CZN indicated that "onsite treatment may be necessary with effluent discharge to a sump, septic system or lagoon." Board staff have determined that CZN's responses are inadequate and more information is required in order to adequately draft conditions for the Project. For each of CZN's proposed methods (sump, septic system, or sewage lagoon), please provide details for each scenario in accordance with the Board's [Guidelines for Developing a](#)

[Waste Management Plan](#) (see section 3.4.6, Appendix A section 2, section 4, and section 7) and the Government of the Northwest Territories' [Northern Land Use Guidelines – Camp and Support Facilities](#). Information to support EQC based on Best Available Technology (BAT) for relevant parameters should be provided in relation to any proposed treatment options.

In addition, Board staff note that CZN has proposed to transport waste to the Prairie Creek Mine for treatment or storage. However, CZN's mining Licence ([MV2008L2-0002](#)) and Permit ([MV2008D0014](#)) do not authorize CZN to treat or store waste from this Project. Therefore, Board staff recommend CZN clarify how the waste from this Project will be managed. Should CZN intend to deposit waste in an NWT community Waste Disposal Facility, CZN must demonstrate to the Board that the community has been consulted and has consented to accept waste from this Project.

Board staff request CZN submit a revised Waste Management Plan that addresses the above noted deficiencies, addresses all reviewer comments and commitments made throughout the Project's proceeding, and is in accordance with the Board's [Guidelines for Developing a Waste Management Plan](#). Please submit the revised Waste Management Plan by **October 21, 2019**. Once the revised Waste Management Plan is deemed complete, it will be distributed for review on the ORS.

If you have any questions or concerns regarding this Information Request, please feel free to contact me at (867) 766 7455 or email jho@mvlwb.com.

Sincerely,



Jacqueline Ho
Regulatory Specialist

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