

Review Comment Table

Board:	SLWB
Review Item:	Great Bear Lake Lodge Water Licence Renewal (S19L3-001)
File(s):	S19L3-001
Proponent:	Great Bear Lake Lodge Ltd.
Document(s):	Renewal Application (908 KB) Location Map - GBLL (313 KB) Sahtu land Use Plan Conformity (123 KB) Request for Exemption from Preliminary Screening (400 KB) Engagement Record and Plan 2017 - 2019 (378 KB) Spill Contingency Plan v. 3.0 (938 KB) Waste Management Plan v. 2.0 (360 KB) Closure and Reclamation Plan v. 2.0 (334 KB) Draft Water Licence conditions (350 KB) Bear Spill Contingency Plan Version 4.0 (1.58MB) Bear Waste Management Plan Version 3.0 (724 KB) Bear Closure and Restoration Plan Version 3.0 (701 KB)
Item For Review Distributed On:	Mar 12 at 13:11 Distribution List Apr 25 at 14:08 Distribution List
Reviewer Comments Due By:	May 9, 2019
Proponent Responses Due By:	May 15, 2019
Item Description:	<p><i>April 25, 2019 - In response to comments and recommendations received on the documents submitted with this licence renewal application, the proponent has revised the Spill Contingency Plan, the Waste Management Plan and the Closure and Restoration Plan and resubmitted these for review and Board approval. Please provide comments and recommendations on:</i></p> <ul style="list-style-type: none"> • <i>Bear Spill Contingency Plan Version 4.0</i> • <i>Bear Waste Management Plan Version 3.0</i> • <i>Bear Closure and Restoration Plan Version 3.0</i> <p><i>The review comment deadline has been extended to end of business day May 9, 2019 and the proponent responses deadline has been extended accordingly to end of business day May 15, 2019.</i></p> <p>Great Bear Lake Lodge Ltd. (GBLL) submitted a complete renewal application for a type B water licence. This Application is to renew GBLL's current Water Licence (Licence) S17L3-001. The purpose of this</p>

Application is to use Water for municipal undertaking related solely to the lodge operation, deposit Grey Water to a Sewage Disposal Facilities, and deposit solid Waste to a Solid Waste Disposal Facilities at Great Bear Lake Lodge, located near Dease Arm of Great Bear Lake, Northwest Territories. The Proponent has also requested an exemption from preliminary screening because the Proponent believes that the development has not been modified since it was previously licenced.

Reviewers are invited to submit comments and recommendations using the Online Review System (ORS) by the review comment deadline specified below. Notices of application for water compensation must also be submitted by the review comment deadline. If reviewers seek clarification on the submission, they are encouraged to correspond directly with the proponent prior to submitting comments and recommendations.

Reviewers may also wish to consider providing an overarching recommendation regarding whether the Board should approve the submission, to provide context for the comments and recommendations and assist the Board with its decision.

Please provide comments and recommendations on the:

- Renewal Application;
- Security Estimate (please note that security was increased to 20K and received for the renewal application S17L3-001);
- Engagement Record and Plan for 2017-2019 (please note that the Board approved the Engagement Plan for S17L3-001);
- Land Use Plan Conformity Information;
- Waste Management Plan, Version 2.0;
- Spill Contingency Plan, Version 3.0;
- Closure and Reclamation Plan, Version 2.0;
- Preliminary Screening Exemption Request (please see below for additional information);
- Draft Water Licence (please clearly indicate which condition you are commenting on).

The purpose of this draft Licence is to allow parties to comment on possible conditions. These draft materials are not intended to limit in any way the scope of parties' comments. The Board is not bound by the contents of the draft Licence and will make its decision at the close of the proceeding on the basis of all the evidence and arguments filed by all parties.

Board staff agrees that this renewal request is exempt from preliminary screening, in accordance with the Preliminary Screening Exemption List Regulations and Exemption List Regulations. If you have comments or recommendations on the possible exemption, please include them in your

	<p>submission and please include rationale. The Board will make a determination on the preliminary screening exemption at the Board meeting (date to be determined). The most recent preliminary screening that was approved by the Board is located under S12L3-002.</p> <p>Under the Sahtu Land Use Plan (SLUP) Board has previously deemed this undertaking a legacy use as defined under the Sahtu Land Use Plan (SLUP or Plan) and therefore exempt from meeting Conformity Requirements (CR) #1, #16 and #18. The Board must confirm that the Application conforms with the SLUP. Reviewers are encouraged to provide comments and recommendations on conformity with the SLUP.</p>
General Reviewer Information:	All documents that have been uploaded to this review are also available on our public Registry. If you have any questions or comments about the ORS or this review, please contact Bonnie Bergsma at (867) 496-2778 or email bonnie.bergsma@slwb.com or Board staff indicated below.
Contact Information:	Aswathy Varghese 8675982413 Bonnie Bergsma

Comment Summary

Environment and Climate Change Canada: Richard Bingley				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
2	General File	Comment (doc) ECCC Coverletter Recommendation		
1	Topic: NT-NU Spill Report Line Typo Reference: Great Bear Lake Lodge Ltd. - Spill Contingency and Emergency Response Plan. Section 11.1 Spill Reporting.	Comment On Page 18 of the Spill Contingency and Emergency Response Plan the Proponent incorrectly lists the NT-NU 24-hour Spill Report Line number as (403) 920-8130. The correct number for the NT-NU 24-hour Spill Report Line is (867) 920-8130. Recommendation ECCC recommends that the Proponent update the Spill Contingency and Emergency Response Plan with the correct NT-NU 24-hour Spill Report Line number.	Apr 18: On page 18 the correct number has been included.	May 10: Change has been made to SCP.

	March 2018.			
3	ECCC Comments	<p>Comment ECCC has reviewed Great Bear Lake Lodge Ltd.'s Revised Documents related to Type B Water Licence Renewal Application (S19L3-001) in accordance with the department's mandate and has no comments at this time.</p> <p>Recommendation N/A</p>		<p>May 10: No further comments or recommendations made</p>

GNWT - ENR: Central Email GNWT

ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
77	General File	<p>Comment (doc) ENR Letter with Comments and Recommendations</p> <p>Recommendation</p>		
82	General File	<p>Comment (doc) ENR Letter with Comments and Recommendations</p> <p>Recommendation</p>		
1	Topic 1: Industrial and Solid, Liquid or Sewage Waste Disposal	<p>Comment If the Proponents Waste Management Plan or methods of waste disposal indicate that project waste, or industrial waste, will be transported to community infrastructure for disposal, the Proponent should not assume they may deposit industrial wastes, generated outside of community boundaries, in Northwest Territories community Solid and Liquid Waste Disposal Facilities.</p> <p>Recommendation 1) Should the Proponent intend to deposit waste in an NWT community Solid and Liquid Waste Disposal Facility, ENR requests that the Proponent demonstrate in the Waste Management Plan, and to the Board, that the receiving communities' Solid</p>	<p>Apr 18: No waste is sent to Deline.</p>	<p>May 10: Response acceptable</p>

		and Liquid Waste Disposal Facility holds a Water Licence that authorizes the disposal of any industrial waste streams originating from outside municipal boundaries. The Proponent should also demonstrate to the Board that the community has been consulted, and has consented in writing, regarding the use of its infrastructure for disposal of the waste streams and quantities in question, and the disposal of such wastes will not contravene the Waters Act or the Environmental Protection Act and related Regulations and Guidelines.		
2	Topic 2: Incineration and Open Burning	<p>Comment The proponent is planning on using an incineration for this project.</p> <p>Recommendation 1) If open burning will be utilized during project activities, only those waste streams identified in the Municipal Solid Wastes Suitable for Open Burning document located on the GNWT ENR website may be open burned without the use of an approved incinerator. The document can be found at the following site. http://www.enr.gov.nt.ca/sites/enr/files/guidelines/solid_wastes_suitable_open_burning.pdf</p>	<p>Apr 18: 1) Only approved waste streams are incinerated. 2) No open burning is conducted. 3) Ash tests are collected at the conclusion of each operating season.</p>	<p>May 10: Proponent has confirmed only acceptable waste streams are incinerated. Part H, condition 6 of the Licence: The Licensee shall ensure that any Waste burned consists only of items that meet the requirements of Environment Canada's Technical Document for Batch Waste Incineration</p>
3	None	<p>Comment None</p> <p>Recommendation 2) At any time, or in the event that the Proponent intends to incinerate any waste streams, the Proponent should provide to the Board Incineration</p>	<p>Apr 18: No open burning is conducted.</p>	<p>May 10: See comment 81 below for additional recommendations for updating the WMP to provide</p>

	<p>Management Strategies that demonstrate that the device and procedures selected are suitable to the waste stream intended for incineration. Otherwise, harmful releases of toxic compounds, will result. Incineration strategies should meet the emissions limits established under the Canada-Wide Standards (CWS) for Dioxins and Furans (CCME 2001), CWS for Mercury Emissions (CCME 2000) and the NWT Ambient Air Quality Guidelines. The Incineration Management Strategies should also include: a) A description of waste streams intended for incineration; b) Selected incineration technology and rationale for selection (the minimum requirement to accommodate complex waste streams should be a dual-chamber, controlled-air incinerator); c) A description of recycling and waste segregation plans that control waste entering the incinerator; d) Operator training and qualifications, and the use of trained and designated operators; e) Procedures for operation and maintenance, including record-keeping (i.e. completion of burn cycle and maintenance logs, and recording of the weight of each waste load charged to the incinerator); f) A reporting requirement to summarize the tracking and record-keeping component; and, g) Weigh scales to record the weight of each load charged to the</p>		<p>more detail on the Incineration Management Strategy.</p>
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		incinerator; h) Details of emission measurement methods, where applicable.		
4	None	<p>Comment None</p> <p>Recommendation 3) Residual ash from the incineration of non-segregated waste must be tested prior to disposal to ensure that it meets the criteria specified in the NWT Environmental Guideline for Industrial Waste Discharges. Incineration ash can be contaminated with toxic compounds and by-products such as dioxins and furans and should therefore be tested to ensure that it is disposed of in an appropriate and approved manner.</p>	<p>Apr 18: Ash tests are collected at the conclusion of each operating season.</p>	<p>May 10: See comment 81 below regarding recommendations for providing more detail about the Incineration Management Strategy in the WMP.</p>
5	Topic 3: Hazardous Waste Management	<p>Comment All Proponents that generate hazardous wastes must be registered as a generator of hazardous waste in the NWT The Guideline for the General Management of Hazardous Waste in the NWT defines hazardous waste and outlines the roles and responsibilities of generators, carriers, and receivers of hazardous waste in the NWT. The ENR, Environment Division (ED) registers generators, carriers, receivers, and tracks the disposal of hazardous waste generated in the NWT to registered receiving facilities on hazardous waste movement documents (manifest). The definition of hazardous waste includes all waste materials that are 'dangerous goods' according to the Transportation of Dangerous Goods Regulations, and any additional waste of</p>	<p>Apr 18: We have a hazardous waste generator number for Great Bear Lake Lodge #NTG650.</p>	<p>May 10: Response acceptable</p>

	<p>special concern that the ED has determined hazardous until proven otherwise, including but not limited to: a) incinerator waste and/or residuals (including bottom ash and fly ash); b) any liquid or solid wastes contaminated with refined petroleum products; c) bilge wastes; d) vehicle or vessel servicing wastes e) drilling wastes; f) produced fluids (Glycol / Hydrocarbon / Inorganic Mixtures); g) tailings; and h) any hydrocarbon, lead, mercury or other forms of contaminated soils. The Guideline for the General Management of Hazardous Waste in the NWT and the Transportation of Dangerous Good Regulations may be found at the following sites: http://www.enr.gov.nt.ca/sites/enr/files/guidelines/general_management.pdf http://www.tc.gc.ca/eng/tdg/clear-menu-497.htm</p> <p>Recommendation 1) If the Proponent is using or generating hazardous waste, they must register as a generator of hazardous waste in the NWT and track the disposal of hazardous waste from the site activities to registered receivers on hazardous waste movement documents provided by ENR. Please contact the Environment Division, ENR to register or for more information contact Mr. Lee Ross, Hazardous Waste Management Specialist, Environmental Protection and Waste Management Division by email</p>		
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6	Topic 4: Fuel Storage and Spill Contingency Planning and Reporting	<p>Comment ENR acknowledges the proponent's Spill Contingency Plan. In addition, the Proponent should also follow best practices for fuel storage and spill containment during project activities which may include the following recommendations.</p> <p>Recommendation 1) To assist in spill contingency planning, information is provided in EPA Spill Contingency Planning and Reporting Regulations found here: https://www.justice.gov.nt.ca/en/files/legislation/environmental-protection/environmental-protection.r2.pdf If clarification or further information is needed please contact the Environment Division, ENR directly to aid in the development of the Plan</p>	Apr 18: For Topic 4, ID 6-12, These are standard BMPs for spill contingency that the SLWB has conditions in the water licence to cover.	May 10: Recommendations will be reflected in Licence conditions
7	None	<p>Comment None</p> <p>Recommendation 2) In accordance with the Spill Contingency Planning and Reporting Regulations Section 10, all spills in accordance with Schedule B must be reported immediately to the 24-hour Spill Report Line (867) 920-8130.</p>		May 10: Included in Licence under Part G, Condition 5
8	None	<p>Comment None</p> <p>Recommendation 3) With respect to the Environmental Protection Act Section 5 (1b) all spills, regardless of amount, must be cleaned up, and contaminated materials disposed of at an approved facility, or in an approved manner. Additionally, as</p>		May 10: Included in Licence under Part G, condition 7

		indicated in Section 5(1c) all reasonable efforts must be made to notify any parties affected or potentially affected by the spill.		
9	None	<p>Comment None</p> <p>Recommendation 4) Fuel storage areas should be greater than 100m distance from the ordinary high water mark of a water body and not located in a drainage channel.</p>		<p>May 10: Due to the location of the lodge on a narrow peninsula, some fuel storage areas cannot meet the 100 m setback. Previously, Inspectors have agreed to 30 m setback. The Proponent has made efforts to move some fuel storage areas to meet the 100 m setback. This is reflected in the Licence Part G, condition 8.</p>
10	None	<p>Comment None</p> <p>Recommendation 5) All fuel or storage vessels containing hazardous substances left for extended periods of time (including overnight in vehicles), should be stationed in an area that contains sufficient secondary containment (i.e. Drip pans, lined bermed areas, double walled enviro-tanks etc.).</p>		<p>May 10: Included in Licence under Part G, condition 9, 10 and 11.</p>
11	None	<p>Comment None</p> <p>Recommendation 6) It is recommended spill kits be provided. Personnel should be trained to ensure that in the event of a spill it is contained and remediated appropriately to industry-accepted best practices and regulatory approval. In case</p>		<p>May 10: Included in Licence under Part G, Condition 2</p>

		refuelling takes place near water, in water spill planning should be considered to prevent inadvertent releases.		
12	None	Comment None Recommendation 7) ENR recommends, for the operator's convenience and increased environmental protection, that all heavy equipment and refuelling vehicles carry portable spill kits that include items such as absorbent pads, containment booms, and spill pool catchment receptacles. Readily available and fully stocked spill kits can effectively mitigate potential spills.		May 10: Included in Licence under Part G, condition 6
13	Topic 5: Spill Contingency Plan - WRO Contact	Comment Section 3 lists Alex Lynch as the Water Resources Officer (WRO). ENR notes Erin Goose is now the WRO in the Sahtu. Recommendation 1) ENR recommends GBLLL update Table 1 with the name of the current WRO.	Apr 18: Updated minor corrections in the SCP for contacts and phone numbers. 	May 10: Change made
14	Topic 6: Spill Contingency Plan	Comment In reference to the following: Table of Contents . Spelling throughout the document Recommendation 1) Following the outline provided in the guideline for SCP needs to be followed. The SCP is very confusing and has a lot of information that can be put at the end of the document, such as the references and other information.	Apr 18: For Topic 6, ID comments 14, 15 - Spelling and formatting corrections made.	May 10: Some changes were made to format. SCP could still be revised to follow more closely the 2007 INAC Guidelines.
15	None	Comment None Recommendation 2) Throughout this document, it requires editing and spelling corrections.	Apr 18: Spelling and formatting corrections made.	May 10: Revised SCP (v. 4.0) will be checked for spelling and edits.

16	Topic: 7 Spill Response Emergency Numbers Table 1	Comment In reference to the following: Table 1 describes the spill response contact and emergency numbers Recommendation 1) Harvey Gaukel contact number is incorrect. It needs to be replaced with 867 767 9236 Ext 51384.	Apr 18: For ID comments 16-19, Updated minor corrections in the SCP for contacts and phone numbers.	May 10: Change made
17	None	Comment None Recommendation 2) Remove Alex Lynch and replace with Erin Goose, remove phone number 587-6551 and replace with 867 445-4107.		May 10: Change made
18	None	Comment None Recommendation 3) Remove Mike Martin and replace with Lee Ross, remove phone number 867-767-9263 ext. 53182 and replace with 867-767-9236 ext. 53187		May 10: Change made
19	None	Comment None Recommendation 4) Add Environment and Natural Resources to the first column line 13		May 10: Change made
20	Topic 8: Spill Contingenc y Plan - MSDS	Comment In version 2.0 of the Spill Contingency Plan, Material Safety Data Sheets (MSDS) were included at the end of the plan. ENR notes version 3.0 of the plan does not include MSDS, although Section 8.5 refers to appended MSDS. Recommendation 1) ENR recommends GBLLL update the Spill Contingency Plan to include MSDS.	Apr 18: MSDS sheets added.	May 10: confirmed MSDS sheets added
21	Topic 9: Spill Contingenc y Plan - Secondary	Comment In review of the Water Licence S17L3-001 renewal application (comment #2 submitted July 24, 2017 and comment #12 submitted May	Apr 18: Berms have been previously measured and approved to be in excess of 110% of total volume capacity.	May 10: Response acceptable

	Containment	<p>15, 2018), ENR raised concerns regarding the secondary containment of hazardous materials. Although the Spill Contingency Plan outlines that berms are in place as secondary containment, ENR notes the proponent has not provided evidence that the volume of the bermed area is sufficient to contain a spill. As previously noted, the bermed area should at minimum, correspond to 110% of the largest tank. ENR has reiterated this comment as a result of the fuel storage areas being in close proximity to Great Bear Lake and therefore have a higher risk of aquatic environmental impact if a spill were to occur.</p> <p>Recommendation 1) ENR recommends GBLLL clarify the volume of the bermed area at each fuel storage location.</p>		
22	Topic 10: Spill Contingency Plan - Potential Spill Scenarios	<p>Comment Table 8 outlines the hazardous materials potential spill scenarios. One of the scenarios presented at the Bulk Fuel Storage Area consists of catastrophic failure of a tank and assumes the entire contents of the tank is spilled instantaneously with a minimum of 205L and maximum of 38,000L. ENR notes in Table 5, there are four tanks that have a maximum capacity of 67,000L. It is therefore not clear why a catastrophic failure of a tank listed in Table 8 is limited to a maximum amount of 38,000L.</p> <p>Recommendation 1) ENR recommends GBLLL provide rationale for indicating a</p>	<p>Apr 18: Table 8 corrected to indicate proper total fuel storage capacity.</p>	<p>May 10: Confirmed change made</p>

		catastrophic failure of a tank in the bulk fuel storage area is limited to a maximum of 38,000L when there are four tanks that have capacity of 67,000L.		
23	Topic 11: Draft Water Licence - Definitions	<p>Comment Part A, Condition 2 of the draft Water Licence defines the terms RECLAIM and secondary containment. ENR notes these terms are not subsequently used in the draft Water Licence.</p> <p>Recommendation 1) ENR recommends the Board remove the terms RECLAIM and secondary containment from the list of terms in Part A, Condition 2.</p>	Apr 18: For ID 23 and 24, SLWB will take care of these in the Water Licence terms and conditions	May 10: RECLAIM definition removed. Secondary Containment retained as a condition was added that includes the term.
24	Topic 12: Draft Water Licence - Water Licence Inspector	<p>Comment Part A, Condition 2 of the draft Water Licence defines the term "Water Licence Inspector" by the following definition, "an Inspector designated by the Minister under section 9 of the Waters Act". ENR notes section 9 of the Waters Act applies to federal appurtenant undertakings. GBLLL is not located within federally managed lands and therefore section 9 of the Waters Act does not apply. Additionally, ENR notes the term "Inspector" is correctly defined in the draft Water Licence as "an Inspector designated by the Minister under subsection 65(1) of the Act".</p> <p>Recommendation 1) ENR recommends the Board ensure the only inspector referenced in the Water Licence is the inspector appointed under subsection 65(1) of the Act.</p>		May 10: Correction made - Water Licence Inspector definition removed . Inspector definition retained.

25	Topic 13: Engagement Activities Update	<p>Comment Under the fourth column, Issue(s) Raised by Affected Party, there seems to be information missing from the dates: 8 June 2017 and 3 September 2017,</p> <p>Recommendation 1) ENR recommends the document is updated with the information that is missing.</p>	<p>Apr 18: No specific engagement noted on June 8; Spetember 3.</p>	<p>May 10: Response acceptable</p>
26	Topic 14: 4.1 - Introduction	<p>Comment Indian and Northern Affairs Land Inspectors and Environmental and Natural Resources officers in the Greater Northwest Territories (the "GNWT") have requested that GBLLL prepare a SCP due to the proximity of the stored fuel to the water. In addition, Schedule B of the NWT SCPRR presents the minimum reportable quantities for various hazardous wastes. The definition of hazardous has been adopted from the Transportation of Dangerous Goods Act (the "TDGA"). Spilled products are classified according to the classifications outlined in the TDGA Regulations, Clear Language. Spilled products are classified according to the classifications outlined in the TDGA Regulations, Clear Language.</p> <p>Recommendation 1) It is recommended that all of the above need to be removed and/or corrected.</p>	<p>Apr 18: Updates to terminology and use of more concise language.</p>	<p>May 10: Confirmed Introduction revised.</p>
27	Topic 15: 4.2 References - Codes	<p>Comment References were used in the creation of the SCP.</p> <p>Recommendation 1) ENR recommends the codes be updated. A lot of them are old and from the early 1990's.</p>	<p>Apr 18: Outdated references removed.</p>	<p>May 10: See comment 79 - all references were removed.</p>

		Some references need to be removed.		
28	Topic 16: 5 Authorities having Jurisdiction with Respect to Spill Response	Comment Table 3 jurisdiction response. Recommendation 1) Referencing the NWT/Nunavut spills working agreement into table 3 is incorrect. The spills working agreement from October 2014 has the required information. This should be corrected.	Apr 18: Table 3 Section 5 updated to reflect the 2014 working agreement.	May 10: Confirmed change made
29	None	Comment None Recommendation 2) The Department of Lands needs to be included in Table 3, Jurisdiction Response.	Apr 18: Table 3 Section 5 updated to reflect the 2014 working agreement.	May 10: Confirmed change made
30	Topic 17: 7 - Facility Information	Comment . Table 5 TABLE 5 ASTs at Lodge Site on page 8. Recommendation 1) Type, storage description and capacity stated in table 5 are not clear that the capacity refers to the amount normally stored or just tank capacity. Clarification is required in this regard.	Apr 18: Section 7 Table 5 clearly refers to total tank capacity.	May 10: Amount of fuel normally stored should be included in the Plan
31	Topic 18: 10.3 - Training	Comment . TABLE 17 Personnel Training Records Recommendation 1) The document states what training will be provided but not who has what training. It is recommended that a list of training for all staff be provided in the SCP.	Apr 18: All employees will familiarize themselves with the SCP and copies will be available and training records will be maintained.	May 10: A table to track training has been included in the SCP.
32	Topic 19: 6.1 Management Approval and Designated Person	Comment . Chummy Plummer is responsible for ensuring the SCP is developed according to regulatory requirements and that the necessary resources to implement the SCP are identified and made available as required. Recommendation 1) It is recommended that the	Apr 18: Contact number provided in section 6.1	May 10: Confirmed change made

		appropriate contact number be provided.		
33	Topic 20: 11.2 - First Response, Page 19	Comment . Flow Chart Recommendation 1) ENR recommends that the flow chart be labeled, and the spill line after safety and containment is added.	Apr 18: Updated spill response flow chart.	May 10: Confirmed change made
34	Topic 21: 11.2.12 Step 12 Estimate the Required Spill Response Resources (If Safe to do so)	Comment . An estimate of the resources required to contain the spill should be provided. Order of magnitude will suffice; however, detailed information is preferred. Recommendation 1) Due to the location of the lodge and the close proximity to the water, it is recommended that a list of resources be provided within the SCP.	Apr 18: Update to the resources available for spill response.	May 10: Confirmed update to resources added
35	Topic 22: 11.3.1 - Spill Response Hazardous Materials (Oil)	Comment . Following first response the contents that have been spilled are to be cleaned up using standard available spill response equipment. The impacted material is to be collected by hand and placed in a hazmat drum. The drum is to be labeled as per TDGA and WHMIS regulations and placed into the on-site hazardous waste storage facility. Do not overfill the barrels. The lodge manager will assess the cleanup and determine if the efforts are satisfactory. Recommendation 1) It is highly recommended to provide the location of all the temporary storage sites for all hazardous materials. There is no indication of the sites in photo provided in Appendix A.	Apr 18: Locations of temporary storage of contaminated material defined as sheds immediately adjacent to airstrip fuel storage tanks.	May 10: Response acceptable. The location was added to the map in the SCP.
36	Topic 23: Spill	Comment . Water resources are to be inspected by the lodge	Apr 18: All mandatory reportable spills will	May 10: Due to the proximity

	Response Method	<p>manager following the assessment of safety. The method is as follows: ? The local receiving bodies of water are to be visually inspected for any presence of hydrocarbons; and if hydrocarbons have reached a water source, adsorbent booms are to be immediately deployed and aqueous oil recovery is to be initiated to prevent further oil slick development. ? Once the oil slick (if present) has been contained and the trenches and dikes have been constructed the lodge manager is to determine the extents of impacted soils. Once the extent of the impact has been determined, the impacted matrix is to be immediately excavated and removed to prevent additional subsurface product migration. Confirmatory samples from the base and edges of the excavation are to be taken and submitted to a CALA and CCME certified laboratory for Fraction F1 to F4 analysis. The area is then to be backfilled and compacted.</p> <p>Recommendation 1) When there is any presence of hydrocarbons or contamination of any kind into a water body, it is the responsibility of the owner/operator, lodge manager or designate to contact the spill line as soon as possible.</p>	immediately be reported to the appropriate authorities.	of fuel storage areas to Great Bear Lake, ENR recommended that all spills, regardless of size are to be reported and cleaned up. This needs to be corrected in the SCP which states only spills > 100 L will be reported to the spill line and spills <100 L will be recorded at the lodge and cleaned up.
37	None	<p>Comment None</p> <p>Recommendation 2) It is recommended that the identity of the source material and location to backfill the excavation area be provided.</p>	Apr 18: Step added to the SCP to include locations of any material that is used for backfilling excavations in section 11.4.	May 10: Confirmed change made.

38	Topic 24: 11.3.4 - Discharge from Tank Overfilling	<p>Comment . The on-site tanks will be filled only once, following the mobilization of fuel to the site by the barge. The filling of the tanks will be performed by the operations manager under the direct supervision of the lodge manager. If the tanks are overfilled, then the operator is to immediately close the refueling valve. The impacted soil is then to be collected and placed into on-site temporary storage tanks.</p> <p>Recommendation 1) It is recommended that the location of the on-site temporary storage tanks be provided in the on-site map.</p>	<p>Apr 18: Locations of temporary storage of contaminated material defined as sheds immediately adjacent to airstrip fuel storage tanks.</p>	<p>May 10: Response acceptable. The location was added to the map in the SCP.</p>
39	Topic 25: 11.3.5 - Discharge from Distributio n Pipe Failure During Refueling	<p>Comment . The operator is to immediately close the main valve leaving the refueling tank. Next, the Lodge manager is to immediately be contacted. The operator is to remain at the site of the spill to ensure that no other person uses the refueling equipment. The Lodge manager is then to lock out the refueling station. The mechanic is then to replace the broken pipe. Impacted soil is to be placed in 45-gallon drums for future on-site remediation. If present, snow is to be collected, placed into temporary tanks and the resulting impacted water is to be treated on-site.</p> <p>Recommendation 1) The location of the on-site temporary tanks needs to be provided for contaminated snow in the onsite map.</p>	<p>Apr 18: Response to ID comments 39 - 43: All contaminants will be stored in the above-mentioned temporary storage area until removed from site and disposed of in an approved disposal facility. No treatment of contaminants will be conducted on site. Temporary storage location added to the site map. Berm deployment discussed in section 11.2.9. &nbsp;</p>	<p>May 10: Confirmed location added to map in SCP.</p>

40	None	<p>Comment None</p> <p>Recommendation 2) It is recommended that an in-depth procedure of how the treatment of water contaminated with hydrocarbons is to be performed on site.</p>	<p>Apr 18: No treatment of contaminants will be conducted on site.</p>	<p>May 10: Response acceptable</p>
41	<p>Topic 26: 11.3.7 Oil Spilled Due to Equipment Leak at Site</p>	<p>Comment . The equipment is to be inspected daily before operation. Any leaks are to be immediately reported to the lodge manager. The leak is then to be repaired by the on-site mechanic. If the mechanic is not immediately available a collection pan is to be placed under the equipment and the contents are to be monitored to ensure that the pan does not overflow. Any impacted soils are to be collected and placed in temporary storage for subsequent remediation. Leaking equipment is not to be used</p> <p>Recommendation 1) The proponent needs to provide a clear understanding of what the proponent will be doing with the fuel caught in the pan, and if the proponent will be treating soil impacted with hydrocarbons. It is not recommended that the proponent not treat impacted soils out on the site. A separate Water License or amendment will be required for this type of treatment process.</p>	<p>Apr 18: No treatment of contaminants will be conducted on site.</p>	<p>May 10: Response acceptable</p>
42	<p>Topic 27: 11.3.8 Oil Spilled Due to Equipment Accident at Site</p>	<p>Comment . Following the securing of the source, the impacted matrix is to be collected and placed in temporary storage for subsequent remediation. Berms can be deployed to contain free</p>	<p>Apr 18: Temporary storage location added to the site map.</p>	<p>May 10: Confirmed location added to map in SCP.</p>

		product and protect water resources. Recommendation 1) The location for the temporary storage of contaminated soil is required on the map.		
43	None	Comment None Recommendation 2) Due to the location of the storage tanks, the close proximity of the water and the lack of space, an explanation of berm deployment to contain free product is required.	Apr 18: Berm deployment discussed in section 11.2.9.	May 10: Confirmed section added.
44	Topic 28: 11.3.9 - Discharge of Sewage and WMP-4 DESCRIPTION OF WASTE MANAGEMENT	Comment . The area is to be made off limits. The contents of the spill are to be then cleaned up by assigned employees using the backhoe or other suitable equipment. The materials are to be placed in the sewage lagoon. Employees are not to directly contact the sewage and are to wear a Tyvek suit, rubber gloves and a half mask respirator fitted with P-100 particulate cartridges. The Tyvek suit, rubber gloves and filters are to be bagged and burned in the incinerator immediately following the removal of PPE. . WMP-4 DESCRIPTION OF WASTE MANAGEMENT Once per year, the ash is deposited in the landfill site. To ensure that proper waste segregation is occurring prior to incineration, a composite ash sample is collected and tested in an approved laboratory prior to annual disposal in the landfill site. Composite ash samples will consist of collecting equal quantities of ash following each use of the incinerator	Apr 18: Incineration of contaminated sewage PPE changed to be temporarily stored until removed from site and disposed of so as to avoid incineration of not approved materials.	May 10: Response acceptable

		<p>Recommendation 1) It is recommended the Tyvek suit, rubber gloves and filters are to be bagged and burned in the incinerator immediately following the removal of PPE. The proponent needs to disclose the type of incinerator being used and the procedure for staff or designate to use this piece of equipment.</p>		
45	None	<p>Comment None Recommendation 2) ENR recommends that a detailed procedure needs to be provided by the proponent for incinerating waste.</p>	<p>Apr 18: Response to ID 45-47: Detailed incineration guidelines are provided in section 4 of the waste management plan in regards to type of waste incinerated and composite ash samples to be collected for testing. &nbsp;</p>	<p>May 10: See comment 81 below. Revised WMP still requires additional detail about incineration methods and procedures.</p>
46	None	<p>Comment None Recommendation 3) ENR recommends a copy of the test results of the incinerator ash, prior to disposal, has to be provided to the inspector to notify him and for his records.</p>		<p>May 10: Included in the Licence as Part H, condition 7.</p>
47	None	<p>Comment None Recommendation 4) ENR recommends that the amount of incinerator ash placed into the landfill needs to be logged by the proponent and provided to the inspector upon request and when the lodge is closed for the season.</p>		<p>May 10: Amount of ash placed in the landfill is a requirement of the Annual Report.</p>
48	Topic 29: SCP- Appendix A and Appendix B	<p>Comment . Aerial view of the lodge and airstrip with arrows to the location of the tanks, water flow and spill kit location Recommendation 1) In the SCPRR in Section (e) is a site map of the location described in paragraph (c); it is</p>	<p>Apr 18: Response to ID comments 48, 49, 52, 53: Limited resolution and detail available due to aerial photo imagery not being required and lack of licensed mapping software.</p>	<p>May 10: Agree that the SCP should provide more description of the facility.</p>

		recommended that section (c) provides a better description of the facility and its location.		
49	None	<p>Comment None</p> <p>Recommendation 2) The aerial view of the lodge and airstrip with arrows to location of the tanks is not clear enough. The tanks are not clearly visible and with no camp description. A better aerial view and camp description is required.</p>		<p>May 10: Proponent lacks mapping software to improve images. Agree that a better description of the lodge and facilities could be included.</p>
50	Topic 30: TABLE 1 - Waste Management Plan Summary	<p>Comment . Table 1 describes the type of wastes accumulated at the lodge</p> <p>Recommendation 1) ENR recommends that contaminated snow/soils be added to the Table 1.</p>	<p>Apr 18: Contaminated snow/soils added to table 1 waste plan.</p>	<p>May 10: Change made to Table</p>
51	Topic 31: WMP-5 LANDFILL SITE	<p>Comment . The Lodge's landfill site is located east of the gravel filtration field. This is where all solid waste is disposed of in mid-September. The site is approximately 20 feet wide by 30 feet long by 12 feet deep. The site is built on top of a ridge comprised of a gravel and clay mix. The location is approximately 600 feet from the shoreline of Great Bear Lake and set at an elevation of 150 feet above water level. On average, the Lodge annually produces approximately 10,800 lb. of solid waste annually (based on 4.5 lb. per day, per person). However, through incineration, food waste segregation and recycling the only waste that will enter the landfill site is approved incinerator ash.</p> <p>Recommendation 1) A description of the type of cover material and the frequency the</p>	<p>Apr 18: Updated section 5 of waste plan to include acquirement of cover material for landfill site.</p>	<p>May 10: Confirmed section added.</p>

		cover material is moved for the landfill is required. It is a requirement to cover waste within a landfill to avoid wildlife attraction and blown debris.		
52	Topic 32: Waste Management Plan	<p>Comment . Appendix A-Waste Management Facilities location photo . 6 GRAVEL FILTRATION FIELD-The gravel filtration field is located 200 feet from the shoreline and approximately 75 feet elevated from the water level. The dimension of the field is 15 feet wide by 30 feet long by 8 feet deep. All greywater produced by the lodge and its occupants are pumped into it after being separated by the holding tanks.</p> <p>Recommendation 1) The aerial site map of the locations in Appendix A are very low resolution, and what is present in those locations isn't very clear. It is recommended that a higher resolution aerial view with descriptions be included.</p>		May 10: proponent lacks mapping software to improve images
53	None	<p>Comment None</p> <p>Recommendation 2) The description of the distance of the gravel filtration field to the shore line of Great Bear Lake, and the water body south of the field, appears to be incorrect when you look at the photo in Appendix A. The correct distance is required to be supplied.</p>		May 10: The gravel filtration field is approximately 200 feet from Great Bear Lake based on the image and as described by the Proponent.
54	Topic 33: 7 - WASTE MANAGEMENT PLAN REVIEW	<p>Comment The Plan will be reviewed annually, prior to the beginning of each operating season. It will also be reviewed as and when required in between those periods either due to issues recognized by</p>	Apr 18: Agree to keep annual log book.	May 10: response acceptable

	AND UPDATE	those operating the lodge, by the Land Use Inspector, or by change in regulations, permit conditions, etc. Recommendation 1) ENR recommends that a log book be required for the annual review and required changes at the lodge.		
55	Topic 34: Closure and restoration plan, 1 - The Water Intake Facilities	Comment . The water intake will be pulled out of the water and brought to Yellowknife. Recommendation 1) It is recommended that the description of the type of equipment used to pump the water and the location of the water intake be provided.	Apr 18: Response to ID comments 55 and 56: Description and location of water system provided in section 1 of the restoration plan.	May 10: Descriptions could be improved in subsequent versions of the Plan
56	Topic 35: 2 Water Treatment Facility	Comment . The Water Treatment Facility will be brought to Yellowknife Recommendation 1) ENR recommends that a description of the type of Water Treatment Facility be submitted.		May 10: Description of the WTF should be added to future versions of the Plan
57	Topic 36: 3 - Sewage and Solid Waste	Comment . Contamination remediation - There were no contaminated sites at the time of the issuance of the Type B Water license and there is no anticipated generation of contaminated sites. Should there be an occurrence that results in a contaminated site the contamination will be dealt with according to the approved 'Spill Contingency Plan' attached to the license. Hazardous waste - The only hazardous waste on site would be the annual accumulation of used oil and oil filters. These would be returned to Yellowknife. Recommendation 1) GBLLL has been in operation well over	Apr 18: Agree	May 10: No comment

		10 yrs. The assertion there are no contaminated sites present is incorrect. The landfill itself is a contaminated site.		
58	None	Comment None Recommendation 2) Hazardous waste doesn't include only oil and oil filters. The list of waste is provided in the Waste Management Plan in Table 1. It is recommended that this be corrected.	Apr 18: Table 1 of Waste Plan corrected.	May 10: Confirmed table 1 corrected.
59	Topic 37: 4 - The Petroleum and Chemical Storage Areas	Comment . The company has two airplanes to assist in moving crews in and moving materials out. The vehicles and heavy equipment will be transported to Deline during the summer on the barge that is at the lodge. From there it will be transported to Yellowknife for sale or disposal on the winter road. This is also how the above ground fuel storage tanks will be removed for resale. There is not any underground fuel storage at the site. Recommendation 1) Within the SCP there is no response for spills from Barges into water. This type of spill response needs to be added to the SCP and the waste accumulated from that type of clean up needs to be added to the Waste Management Plan. The contact for the coast guard also needs to be added to Table 1 Spill response emergency numbers in the SCP.	Apr 18: Barge spill plan added to section 11.3.9	May 10: Confirmed barge spill plan added. The Coast Guard contact needs to be added to Table 1.
60	None	Comment None Recommendation 2) The 3rd line in the paragraph, "From there it will be transported to Yellowknife for sale or disposal on the winter road", needs to be	Apr 18: Grammar corrected.	May 10: Confirmed

		corrected. There is no disposal of any kind on the winter road.		
61	Topic 38: 5 - Any Sites Affected by Waste Spills	<p>Comment . There were no contaminated sites at the time of the issuance of the Type B Water license and there is no anticipated generation of contaminated sites. Should there be an occurrence that results in a contaminated site the contamination will be dealt with according to the approved 'Spill Contingency Plan' attached to the license.</p> <p>Recommendation 1) A description of the closure of all the sites is to be included in the Closure and Restoration Plan.</p>	<p>Apr 18: Response to ID comments 61 and 62: Section revised, groundwater monitoring wells are excessive and not necessary. Sampling can be conducted if necessary.</p>	<p>May 10: Closure Plan to be reviewed against requirements in the associated Permit S16F-001 to determine if all components have been addressed.</p>
62	Topic 39: 8 The Potential for Groundwater Contamination	<p>Comment . We do not expect any ground water contamination. There has never been any ground water contamination. The solid waste pit is over 300 metres away from the waters edge as well as over 20 metres above the water level. The gravel base serves as a natural filter to avoid any contamination.</p> <p>Recommendation 1) Confirmation would be required to prove there is no ground water contamination. It is also recommended that ground water wells be placed in the proper places at the landfill site to verify and prove there is no present contamination and no future contamination. As no liner is in place at the landfill site there is no guarantee groundwater contamination can be avoided or has not already taken place.</p>	<p>Apr 18: Groundwater monitoring wells are excessive and not necessary. Sampling can be conducted if necessary.</p>	<p>May 10: Agree that groundwater monitoring wells are not required at this time. The lodge only operates for 2 months of each year.</p>
63	Topic 40: 9 - Any	<p>Comment . Duplicated paragraph under section 9,</p>	<p>Apr 18: Duplicate paragraph removed.</p>	<p>May 10: Confirmed</p>

	Facilities or Area Which May Have Been Affected by Development Such That Potential Pollution Problems Exist	Once we stop grading the airstrip, the natural vegetation that we prevent from taking it over, would cover the airstrip and return it to its natural state. To promote natural re-vegetation, the company will consult with regulatory agencies to determine if additional steps were required (e.g. re-contouring or scarifying). Recommendation 1) ENR recommends the duplicated paragraph be removed.		
64	Topic 41: 13 APPENDIX A - LOCATIONS OF DISTURBED AREAS, BORROW MATERIAL LOCATIONS AND SITE FACILITIES	Comment . Map of site Recommendation 1) ENR recommends that a more detailed map is required for the Closure and Restoration Plan.	Apr 18: This is the best resolution we can get.	May 10: Mapping can be improved in subsequent versions of the Plan
65	Topic 42: Wildlife: NWT Listed and Pre-listed Species at Risk	Comment Sections 76 and 77 of the Species at Risk (NWT) Act require the Minister of Environment and Natural Resources to make a submission to the body responsible for assessing the potential impacts of a proposed development, or for considering a Land Use Permit or Water Licence application, respecting the potential impacts of the proposed development, Permit or Licence application on a	Apr 18: Agree that there is no risk to at risk species.	May 10: No comment

	<p>NWT-listed or pre-listed species or its habitat. NWT-listed species are those that are on the NWT List of Species at Risk. Pre-listed species are those that have been assessed by the NWT Species at Risk Committee (SARC) but have not yet been added to the NWT List of Species at Risk. The Proponent should be aware that NWT-listed or pre-listed species at risk and their habitat may also be subject to protection under existing sections of the NWT Wildlife Act. As a best practice, ENR encourages the Proponent to consider potential impacts, mitigation measures and monitoring requirements for species at risk listed under the federal Species at Risk Act, as well as those designated as at risk by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) that may occur in the project area, and the prohibitions that may apply to these species under federal legislation. The project area overlaps with the ranges of the following NWT-listed and/or pre-listed species: . Boreal Caribou - Threatened in the NWT . Barren-ground Caribou - Threatened in the NWT . Grizzly Bear - Special Concern in NWT . Little Brown Myotis (bat) - Special Concern in the NWT</p> <p>Recommendation 1) Although the project overlaps with the range(s) of the species listed above, ENR is of the opinion that the scope, nature, areal</p>		
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		extent, scale and/or timing of the proposed project are such that the likelihood of impacts to NWT-listed or pre-listed species at risk is minimal.		
66	Topic 43: Cumulative Effects Tracking	<p>Comment Keeping track of the disturbance footprint of development activities is an important component of tracking and informing the management of cumulative effects on wildlife and wildlife habitat.</p> <p>Recommendation 1) The Proponent should submit the bounding coordinates or geospatial data for the proposed project footprint and for the completed project footprint to the Land and Water Board for placement on the public registry. The Mackenzie Valley Land and Water Board's Standards for Geographic Information Systems (GIS) Submissions should be followed when submitting spatial data.</p>	Apr 18: Agree.	May 10: No comment
67	Topic 44: Wildlife Abodes	<p>Comment Subject to subsection 51(2) of the Wildlife Act, it is illegal to break into, destroy, or damage a den, beaver dam or lodge, muskrat push-up or hibernaculum unless you have an Aboriginal or treaty right or a Permit to do so. Protection of dens, beaver lodges, muskrat push-ups, and hibernacula is essential to ensuring reproductive success and survival of both adults and young.</p> <p>Recommendation 1) The Proponent should conduct pre-activity surveys within 800m of the project footprint to identify</p>	Apr 18: The lodge does not operate between Sept 30 - March 30 so no survey is required	May 10: Agree no bear den survey required.

		active bear dens if project activities will occur between September 30 and March 30. Surveys should be conducted in the fall to detect freshly dug dens.		
68	None	Comment None Recommendation 2) If an active bear den is detected, or suspected, the Proponent should implement and maintain an 800 m exclusion zone until the bear emerges in spring.	Apr 18: Response to ID comments 68 - 75: These are standard recommendations that the SLWB can include as conditions in the WL.	May 10: The lodge does not operate during periods when bears are denning.
69	None	Comment None Recommendation 3) If a bear den and exclusion zone would result in the halt of part or the entire program, the Proponent should contact ENR to discuss alternative mitigation options. The location of active bear dens should be kept confidential between the developer and ENR until after emergence in the spring.		May 10: The lodge does not operate when bear dens are active.
70	None	Comment None Recommendation 4) It is recommended that, if encountered, beaver lodges, muskrat push-ups, and hibernacula are not disturbed or damaged.		May 10: The lodge operates with due consideration and respect to wildlife.
71	Topic 45: Wildlife Attractants and Waste Management	Comment Subject to sub-section 66(1) of the Wildlife Act no person shall store food, waste, or other substances in a manner that may attract big game or other prescribed wildlife and put people, domestic animals, or wildlife in danger. Subject to sub-section 65(1) of the Wildlife Act, it is illegal to intentionally feed big game, furbearers or other prescribed wildlife. Schedule A		May 10: Added to Licence Part H, Condition 8

		- Part 2 of the Wildlife General Regulations sets out the species prescribed as fur-bearers. Recommendation 1) The Proponent should utilize food and garbage handling and storage procedures that will minimize the attraction of wildlife.		
72	None	Comment None Recommendation 2) The Proponent should store all food, waste, washed recyclables and debris that may attract wildlife within sealed animal proof containers until final disposal.		May 10: Added to Licence Part H, Condition 9
73	None	Comment None Recommendation 3) The Proponent should ensure that sealed animal proof containers are cleaned once emptied to minimize the attraction of wildlife.		May 10: Added to Licence Part H, Condition 10
74	None	Comment None Recommendation 4) The Proponent should ensure that all grey water (dishwater, showers, laundry, etc.) and black water (sewage) are treated and disposed of in a manner that will minimize the attraction of wildlife.		May 10: Added to Licence Part H, Condition 11
75	None	Comment None Recommendation 5) The Proponent should remove all waste petroleum products including used oil filters, rags, scrap metal, discarded machinery, parts, drums, barrels, or plastics to an approved waste disposal facility.		May 10: Added to Licence Part H, Condition 12
76	Topic 46: General -	Comment In the letter sent on May 30, 2018, from the Board to GBLLL for the issuance of	Apr 18: Too many adjustments made in the previous revisions, going	May 10: Response acceptable

	Plan Revisions	Water Licence S17L3-001, it is explained that the Spill Contingency Plan, Waste Management Plan and the Closure and Reclamation Plan were not approved. It is also explained that GBLL was to submit revised plans, for Board approval, that address reviewer comments and recommendations as per Table 1 in the letter. ENR notes the inclusion of a table of conformance would be helpful to identify where in the plans the revisions were included. Recommendation 1) ENR recommends GBLL include a table of conformance in each plan noted above that explains where in the updated plan the revisions required in Table 1 were made.	forward all revisions will be tracked at the front of the document.	
78	Topic 1: Revisions Table	Comment The table at the beginning of the Spill Contingency Plan outlines the version control & revisions. This table explains that for version 4.0, comments have been addressed and due to the volume of changes made, a separate table has been made documenting changes for this version. ENR could not locate the table that documents changes for this version. Recommendation 1) ENR recommends GBLL provide the table documenting changes for version 4.0 in the Spill Contingency Plan.		May 10: A table was not provided due to volume of changes required. This was a typo omitting the word "not"
79	Topic 2: References	Comment ENR comment #14 requested GBLL to reformat the Spill Contingency Plan by placing the references at the end of the document. As well,		May 10: Agree that all current references should be included in a revised Plan.

		<p>ENR comment #27 recommended GBLL remove outdated standards, guidelines, acts or regulations that are included in the references list. In response, GBLL has removed the entire reference list in the updated plan (version 4.0).</p> <p>Recommendation 1) ENR recommends GBLL ensure all references such as standards, guidelines, acts or regulations that were used in the creation of the plan are included in the Spill Contingency Plan.</p>		
80	Topic 3: Revisions Table	<p>Comment The Waste Management Plan and the Closure and Reclamation Plan both contain a table that outlines the version control & revisions. In each plan, the most recent version has not been included (version 3.0).</p> <p>Recommendation 1) ENR recommends GBLL ensure subsequent updates to any plans include an accurate table outlining the version control & revisions.</p>		May 10: Agree
81	Topic 4: Incineration Details	<p>Comment Previous comments recommended GBLL provide further details concerning incineration at site. In Section 4 of the updated version of the Waste Management Plan, the description of incineration is still limited to types of waste acceptable for incineration and, sampling and depositing ash.</p> <p>Recommendation 1) ENR recommends GBLL update the Waste Management Plan to clarify: the selected incineration technology and rationale for selection; the procedures for</p>		May 10: Agree that additional details about incineration should be added to the WMP

		operation and maintenance; and, operator training and qualifications.		
Sahtu Renewable Resource Board: Colin Macdonald				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
1	Licence Renewal Application	Comment The SRRB has reviewed the documents associated with the licence application and have no comments or recommendations. Recommendation None.		May 10: No comments or recommendations made.



April 2, 2019

Bonnie Bergsma
Regulatory Specialist
Sahtu Land and Water Board
Box 1, Fort Good Hope
Northwest Territories
X0E 0H0

Dear Ms. Bergsma,

**Re: Great Bear Lake Lodge Ltd. (GBLLL)
Water Licence Renewal Application – S19L3-001
Lodge Operations - Water Use and Waste Deposits
Request for Review and Comments**

The Department of Environment and Natural Resources (ENR), Government of the Northwest Territories has reviewed the renewal application at reference based on its mandated responsibilities under the *Environmental Protection Act*, the *Forest Management Act*, the *Forest Protection Act*, the *Species at Risk (NWT) Act*, the *Waters Act* and the *Wildlife Act* has and provides the following comments and recommendations for the consideration of the Board.

Topic 1: Industrial and Solid, Liquid or Sewage Waste Disposal

Comment(s):

If the Proponents Waste Management Plan or methods of waste disposal indicate that project waste, or industrial waste, will be transported to community infrastructure for disposal, the Proponent should not assume they may deposit industrial wastes, generated outside of community boundaries, in Northwest Territories community Solid and Liquid Waste Disposal Facilities.

Recommendation(s):

- 1) Should the Proponent intend to deposit waste in an NWT community Solid and Liquid Waste Disposal Facility, ENR requests that the Proponent demonstrate in the Waste Management Plan, and to the Board, that the receiving communities' Solid and Liquid Waste Disposal Facility holds a Water Licence that authorizes the disposal of any industrial waste streams originating from outside municipal boundaries. The Proponent should also demonstrate to the Board that the

community has been consulted, and has consented in writing, regarding the use of its infrastructure for disposal of the waste streams and quantities in question, and the disposal of such wastes will not contravene the Waters Act or the Environmental Protection Act and related Regulations and Guidelines.

Topic 2: Incineration and Open Burning

Comment(s):

The proponent is planning on using an incineration for this project.

Recommendation(s):

1) If open burning will be utilized during project activities, only those waste streams identified in the *Municipal Solid Wastes Suitable for Open Burning* document located on the GNWT ENR website may be open burned without the use of an approved incinerator. The document can be found at the following site.

http://www.enr.gov.nt.ca/sites/enr/files/guidelines/solid_wastes_suitable_open_burning.pdf

2) At any time, or in the event that the Proponent intends to incinerate any waste streams, the Proponent should provide to the Board *Incineration Management Strategies* that demonstrate that the device and procedures selected are suitable to the waste stream intended for incineration. Otherwise, harmful releases of toxic compounds, will result. Incineration strategies should meet the emissions limits established under the Canada-Wide Standards (CWS) for Dioxins and Furans (CCME 2001), CWS for Mercury Emissions (CCME 2000) and the NWT Ambient Air Quality Guidelines. The *Incineration Management Strategies* should also include:

- a) A description of waste streams intended for incineration;
- b) Selected incineration technology and rationale for selection (the minimum requirement to accommodate complex waste streams should be a dual-chamber, controlled-air incinerator);
- c) A description of recycling and waste segregation plans that control waste entering the incinerator;
- d) Operator training and qualifications, and the use of trained and designated operators;
- e) Procedures for operation and maintenance, including record-keeping (i.e. completion of burn cycle and maintenance logs, and recording of the weight of each waste load charged to the incinerator);
- f) A reporting requirement to summarize the tracking and record-keeping component; and,
- g) Weigh scales to record the weight of each load charged to the incinerator;
- h) Details of emission measurement methods, where applicable.

- 3) Residual ash from the incineration of non-segregated waste must be tested prior to disposal to ensure that it meets the criteria specified in the *NWT Environmental Guideline for Industrial Waste Discharges*. Incineration ash can be contaminated with toxic compounds and by-products such as dioxins and furans and should therefore be tested to ensure that it is disposed of in an appropriate and approved manner.

Topic 3: Hazardous Waste Management

Comment(s):

All Proponents that generate hazardous wastes must be registered as a generator of hazardous waste in the NWT

The Guideline for the General Management of Hazardous Waste in the NWT defines hazardous waste and outlines the roles and responsibilities of generators, carriers, and receivers of hazardous waste in the NWT. The ENR, Environment Division (ED) registers generators, carriers, receivers, and tracks the disposal of hazardous waste generated in the NWT to registered receiving facilities on hazardous waste movement documents (manifest). The definition of hazardous waste includes all waste materials that are 'dangerous goods' according to the Transportation of Dangerous Goods Regulations, and any additional waste of special concern that the ED has determined hazardous until proven otherwise, including but not limited to:

- a) incinerator waste and/or residuals (including bottom ash and fly ash);
- b) any liquid or solid wastes contaminated with refined petroleum products;
- c) bilge wastes;
- d) vehicle or vessel servicing wastes
- e) drilling wastes;
- f) produced fluids (Glycol / Hydrocarbon / Inorganic Mixtures);
- g) tailings; and
- h) any hydrocarbon, lead, mercury or other forms of contaminated soils.

The Guideline for the General Management of Hazardous Waste in the NWT and the Transportation of Dangerous Good Regulations may be found at the following sites:

http://www.enr.gov.nt.ca/sites/enr/files/guidelines/general_management.pdf

<http://www.tc.gc.ca/eng/tdg/clear-menu-497.htm>

Recommendation(s):

- 1) If the Proponent is using or generating hazardous waste, they must register as a generator of hazardous waste in the NWT and track the disposal of hazardous waste from the site activities to registered receivers on hazardous waste movement documents provided by ENR. Please contact the Environment Division, ENR to register or for more information contact Mr. Lee

Ross, Hazardous Waste Management Specialist, Environmental Protection and Waste Management Division by email (Lee.Ross@gov.nt.ca) or by phone (867) 767-9236 extension 53187.

Topic 4: Fuel Storage and Spill Contingency Planning and Reporting

Comment(s):

ENR acknowledges the proponent's Spill Contingency Plan.

In addition, the Proponent should also follow best practices for fuel storage and spill containment during project activities which may include the following recommendations.

Recommendation(s):

- 1) To assist in spill contingency planning, information is provided in EPA *Spill Contingency Planning and Reporting Regulations* found here:

<https://www.justice.gov.nt.ca/en/files/legislation/environmental-protection/environmental-protection.r2.pdf>

If clarification or further information is needed please contact the Environment Division, ENR directly to aid in the development of the Plan

- 2) In accordance with the *Spill Contingency Planning and Reporting Regulations Section 10*, all spills in accordance with Schedule B must be reported immediately to the 24-hour Spill Report Line (867) 920-8130.
- 3) With respect to the *Environmental Protection Act Section 5 (1b)* all spills, regardless of amount, must be cleaned up, and contaminated materials disposed of at an approved facility, or in an approved manner. Additionally, as indicated in *Section 5(1c)* all reasonable efforts must be made to notify any parties affected or potentially affected by the spill.
- 4) Fuel storage areas should be greater than 100m distance from the ordinary high water mark of a water body and not located in a drainage channel.
- 5) All fuel or storage vessels containing hazardous substances left for extended periods of time (including overnight in vehicles), should be stationed in an area that contains sufficient secondary containment (i.e. Drip pans, lined bermed areas, double walled enviro-tanks etc.).
- 6) It is recommended spill kits be provided. Personnel should be trained to ensure that in the event of a spill it is contained and remediated appropriately to industry-accepted best practices and regulatory approval. In case refuelling takes place near water, in water spill planning should be considered to prevent inadvertent releases.

7) ENR recommends, for the operator's convenience and increased environmental protection, that all heavy equipment and refuelling vehicles carry portable spill kits that include items such as absorbent pads, containment booms, and spill pool catchment receptacles. Readily available and fully stocked spill kits can effectively mitigate potential spills.

Topic 5: Spill Contingency Plan – WRO Contact

Comment(s):

Section 3 lists Alex Lynch as the Water Resources Officer (WRO). ENR notes Erin Goose is now the WRO in the Sahtu.

Recommendation(s):

1) ENR recommends GBLLL update Table 1 with the name of the current WRO.

Topic 6: Spill Contingency Plan

Comment(s):

In reference to the following:

- Table of Contents
- Spelling throughout the document

Recommendation(s):

1) Following the outline provided in the guideline for SCP needs to be followed. The SCP is very confusing and has a lot of information that can be put at the end of the document, such as the references and other information.

2) Throughout this document, it requires editing and spelling corrections.

Topic: 7 Spill Response Emergency Numbers Table 1

Comment(s):

In reference to the following:

- Table 1 describes the spill response contact and emergency numbers

Recommendation(s):

1) Harvey Gaukel contact number is incorrect. It needs to be replaced with 867 767 9236 Ext 51384.

- 2) Remove Alex Lynch and replace with Erin Goose, remove phone number 587-6551 and replace with 867 445-4107.
- 3) Remove Mike Martin and replace with Lee Ross, remove phone number 867-767-9263 ext. 53182 and replace with 867-767-9236 ext. 53187.
- 4) Add Environment and Natural Resources to the first column line 13.

Topic 8: Spill Contingency Plan – MSDS

Comment(s):

In version 2.0 of the Spill Contingency Plan, Material Safety Data Sheets (MSDS) were included at the end of the plan. ENR notes version 3.0 of the plan does not include MSDS, although Section 8.5 refers to appended MSDS.

Recommendation(s):

- 1) ENR recommends GBLLL update the Spill Contingency Plan to include MSDS.

Topic 9: Spill Contingency Plan – Secondary Containment

Comment(s):

In review of the Water Licence S17L3-001 renewal application (comment #2 submitted July 24, 2017 and comment #12 submitted May 15, 2018), ENR raised concerns regarding the secondary containment of hazardous materials. Although the Spill Contingency Plan outlines that berms are in place as secondary containment, ENR notes the proponent has not provided evidence that the volume of the bermed area is sufficient to contain a spill. As previously noted, the bermed area should at minimum, correspond to 110% of the largest tank.

ENR has reiterated this comment as a result of the fuel storage areas being in close proximity to Great Bear Lake and therefore have a higher risk of aquatic environmental impact if a spill were to occur.

Recommendation(s):

- 1) ENR recommends GBLLL clarify the volume of the bermed area at each fuel storage location.

Topic 10: Spill Contingency Plan – Potential Spill Scenarios

Comment(s):

Table 8 outlines the hazardous materials potential spill scenarios. One of the scenarios presented at the Bulk Fuel Storage Area consists of catastrophic failure of a tank and assumes the entire contents of the tank is spilled instantaneously with a minimum of 205L and maximum of 38,000L. ENR notes in Table 5, there are four tanks that have a maximum capacity of 67,000L. It is therefore not clear why a catastrophic failure of a tank listed in Table 8 is limited to a maximum amount of 38,000L.

Recommendation(s):

- 1) ENR recommends GBLLL provide rationale for indicating a catastrophic failure of a tank in the bulk fuel storage area is limited to a maximum of 38,000L when there are four tanks that have capacity of 67,000L.

Topic 11: Draft Water Licence – Definitions

Comment(s):

Part A, Condition 2 of the draft Water Licence defines the terms RECLAIM and secondary containment. ENR notes these terms are not subsequently used in the draft Water Licence.

Recommendation(s):

- 1) ENR recommends the Board remove the terms RECLAIM and secondary containment from the list of terms in Part A, Condition 2.

Topic 12: Draft Water Licence – Water Licence Inspector

Comment(s):

Part A, Condition 2 of the draft Water Licence defines the term “Water Licence Inspector” by the following definition, “an Inspector designated by the Minister under section 9 of the *Waters Act*”. ENR notes section 9 of the *Waters Act* applies to federal appurtenant undertakings. GBLLL is not located within federally managed lands and therefore section 9 of the *Waters Act* does not apply.

Additionally, ENR notes the term “Inspector” is correctly defined in the draft Water Licence as “an Inspector designated by the Minister under subsection 65(1) of the Act”.

Recommendation(s):

- 1) ENR recommends the Board ensure the only inspector referenced in the Water Licence is the inspector appointed under subsection 65(1) of the Act.

Topic 13: Engagement Activities Update

Comment(s):

Under the fourth column, Issue(s) Raised by Affected Party, there seems to be information missing from the dates: 8 June 2017 and 3 September 2017.

Recommendation(s):

- 1) ENR recommends the document is updated with the information that is missing.

Topic 14: 4.1 - Introduction

Comment(s):

Indian and Northern Affairs Land Inspectors and Environmental and Natural Resources officers in the Greater Northwest Territories (the “GNWT”) have requested that GBLLL prepare a SCP due to the proximity of the stored fuel to the water.

In addition, Schedule B of the NWT SCPRR presents the minimum reportable quantities for various hazardous wastes. The definition of hazardous has been adopted from the Transportation of Dangerous Goods Act (the “TDGA”). Spilled products are classified according to the classifications outlined in the TDGA Regulations, Clear Language.

Spilled products are classified according to the classifications outlined in the TDGA Regulations, Clear Language.

Recommendation(s):

- 1) It is recommended that all of the above need to be removed and/or corrected.

Topic 15: 4.2 References - Codes

Comment(s):

References were used in the creation of the SCP.

Recommendation(s):

- 1) ENR recommends the codes be updated. A lot of them are old and from the early 1990's. Some references need to be removed.

Topic 16: 5 Authorities having Jurisdiction with Respect to Spill Response

Comment(s):

- Table 3 jurisdiction response.

Recommendation(s):

- 1) Referencing the NWT/Nunavut spills working agreement into table 3 is incorrect. The spills working agreement from October 2014 has the required information. This should be corrected.
- 2) The Department of Lands needs to be included in Table 3, Jurisdiction Response.

Topic 17: 7 - Facility Information

Comment(s):

- Table 5 TABLE 5 ASTs at Lodge Site on page 8.

Recommendation(s):

- 1) Type, storage description and capacity stated in table 5 are not clear that the capacity refers to the amount normally stored or just tank capacity. Clarification is required in this regard.

Topic 18: 10.3 - Training

Comment(s):

- TABLE 17 Personnel Training Records.

Recommendation(s):

- 1) The document states what training will be provided but not who has what training. It is recommended that a list of training for all staff be provided in the SCP.

Topic 19: 6.1 Management Approval and Designated Person

Comment(s):

- Chummy Plummer is responsible for ensuring the SCP is developed according to regulatory requirements and that the necessary resources to implement the SCP are identified and made available as required.

Recommendation(s):

- 1) It is recommended that the appropriate contact number be provided.

Topic 20: 11.2 - First Response, Page 19

Comment(s):

- Flow Chart

Recommendation(s):

- 1) ENR recommends that the flow chart be labeled, and the spill line after safety and containment is added.

Topic 21: 11.2.12 Step 12 - Estimate the Required Spill Response Resources (If Safe to do so)

Comment(s):

- An estimate of the resources required to contain the spill should be provided. Order of magnitude will suffice; however, detailed information is preferred.

Recommendation(s):

- 1) Due to the location of the lodge and the close proximity to the water, it is recommended that a list of resources be provided within the SCP.

Topic 22: 11.3.1 - Spill Response - Hazardous Materials (Oil)

Comment(s):

- Following first response the contents that have been spilled are to be cleaned up using standard available spill response equipment. The impacted material is to be collected by hand and placed in a hazmat drum. The drum is to be labeled as per TDGA and WHMIS regulations and placed into the on-site hazardous waste storage facility. Do not overfill the barrels. The lodge manager will assess the cleanup and determine if the efforts are satisfactory.

Recommendation(s):

- 1) It is highly recommended to provide the location of all the temporary storage sites for all hazardous materials. There is no indication of the sites in photo provided in Appendix A.

Topic 23: Spill Response Method

Comment(s):

- Water resources are to be inspected by the lodge manager following the assessment of safety. The method is as follows:
 - The local receiving bodies of water are to be visually inspected for any presence of hydrocarbons; and if hydrocarbons have reached a water source, adsorbent booms are to be immediately deployed and aqueous oil recovery is to be initiated to prevent further oil slick development.
 - Once the oil slick (if present) has been contained and the trenches and dikes have been constructed the lodge manager is to determine the extents of impacted soils. Once the extent of the impact has been determined, the impacted matrix is to be immediately excavated and removed to prevent additional subsurface product migration. Confirmatory samples from the base and edges of the excavation are to be taken and submitted to a CALA and CCME certified laboratory for Fraction F1 to F4 analysis. The area is then to be backfilled and compacted.

Recommendation(s):

- 1) When there is any presence of hydrocarbons or contamination of any kind into a water body, it is the responsibility of the owner/operator, lodge manager or designate to contact the spill line as soon as possible.
- 2) It is recommended that the identity of the source material and location to backfill the excavation area be provided.

Topic 24: 11.3.4 - Discharge from Tank - Overfilling

Comment(s):

- The on-site tanks will be filled only once, following the mobilization of fuel to the site by the barge. The filling of the tanks will be performed by the operations manager under the direct supervision of the lodge manager. If the tanks are overfilled, then the operator is to immediately close the refueling valve. The impacted soil is then to be collected and placed into on-site temporary storage tanks.

Recommendation(s):

- 1) It is recommended that the location of the on-site temporary storage tanks be provided in the on-site map.

Topic 25: 11.3.5 - Discharge from Distribution Pipe Failure During Refueling

Comment(s):

- The operator is to immediately close the main valve leaving the refueling tank. Next, the Lodge manager is to immediately be contacted. The operator is to remain at the site of the spill to ensure that no other person uses the refueling equipment. The Lodge manager is then to lock out the refueling station. The mechanic is then to replace the broken pipe. Impacted soil is to be placed in 45-gallon drums for future on-site remediation. If present, snow is to be collected, placed into temporary tanks and the resulting impacted water is to be treated on-site.

Recommendation(s):

- 1) The location of the on-site temporary tanks needs to be provided for contaminated snow in the onsite map.
- 2) It is recommended that an in depth procedure of how the treatment of water contaminated with hydrocarbons is to be performed on site.

Topic 26: 11.3.7 Oil Spilled Due to Equipment Leak at Site

Comment(s):

- The equipment is to be inspected daily before operation. Any leaks are to be immediately reported to the lodge manager. The leak is then to be repaired by the on-site mechanic. If the mechanic is not immediately available a collection pan is to be placed under the equipment and the contents are to be monitored to ensure that the pan does not overflow. Any impacted soils are to be collected and placed in temporary storage for subsequent remediation. Leaking equipment is not to be used.

Recommendation(s):

- 1) The proponent needs to provide a clear understanding of what the proponent will be doing with the fuel caught in the pan, and if the proponent will be treating soil impacted with hydrocarbons. It is not recommended that the proponent not treat impacted soils out on the site. A separate Water License or amendment will be required for this type of treatment process.

Topic 27: 11.3.8 Oil Spilled Due to Equipment Accident at Site

Comment(s):

- Following the securing of the source, the impacted matrix is to be collected and placed in temporary storage for subsequent remediation. Berms can be deployed to contain free product and protect water resources.

Recommendation(s):

- 1) The location for the temporary storage of contaminated soil is required on the map.
- 2) Due to the location of the storage tanks, the close proximity of the water and the lack of space, an explanation of berm deployment to contain free product is required.

Topic 28: 11.3.9 - Discharge of Sewage and WMP-4 DESCRIPTION OF WASTE MANAGEMENT

Comment(s):

- The area is to be made off limits. The contents of the spill are to be then cleaned up by assigned employees using the backhoe or other suitable equipment. The materials are to be placed in the sewage lagoon. Employees are not to directly contact the sewage and are to wear a Tyvek suit, rubber gloves and a half mask respirator fitted with P-100 particulate cartridges. The Tyvek suit, rubber gloves and filters are to be bagged and burned in the incinerator immediately following the removal of PPE.
- **WMP-4 DESCRIPTION OF WASTE MANAGEMENT** Once per year, the ash is deposited in the landfill site. To ensure that proper waste segregation is occurring prior to incineration, a composite ash sample is collected and tested in an approved laboratory prior to annual disposal in the landfill site. Composite ash samples will consist of collecting equal quantities of ash following each use of the incinerator

Recommendation(s):

- 1) It is recommended the Tyvek suit, rubber gloves and filters are to be bagged and burned in the incinerator immediately following the removal of PPE. The proponent needs to disclose the type of incinerator being used and the procedure for staff or designate to use this piece of equipment.
- 2) ENR recommends that a detailed procedure needs to be provided by the proponent for incinerating waste.
- 3) ENR recommends a copy of the test results of the incinerator ash, prior to disposal, has to be provided to the inspector to notify him and for his records.

- 4) ENR recommends that the amount of incinerator ash placed into the landfill needs to be logged by the proponent and provided to the inspector upon request and when the lodge is closed for the season.

Topic 29: SCP-Appendix A and Appendix B

Comment(s):

- Aerial view of the lodge and airstrip with arrows to the location of the tanks, water flow and spill kit location

Recommendation(s):

- 1) In the SCPRR in Section (e) is a site map of the location described in paragraph (c); it is recommended that section (c) provides a better description of the facility and its location.
- 2) The aerial view of the lodge and airstrip with arrows to location of the tanks is not clear enough. The tanks are not clearly visible and with no camp description. A better aerial view and camp description is required.

Topic 30: TABLE 1 - Waste Management Plan Summary

Comment(s):

- Table 1 describes the type of wastes accumulated at the lodge

Recommendation(s):

- 1) ENR recommends that contaminated snow/soils be added to the Table 1.

Topic 31: WMP-5 LANDFILL SITE

Comment(s):

- The Lodge's landfill site is located east of the gravel filtration field. This is where all solid waste is disposed of in mid-September. The site is approximately 20 feet wide by 30 feet long by 12 feet deep. The site is built on top of a ridge comprised of a gravel and clay mix. The location is approximately 600 feet from the shoreline of Great Bear Lake and set at an elevation of 150 feet above water level. On average, the Lodge annually produces approximately 10,800 lb. of solid waste annually (based on 4.5 lb. per day, per person). However, through incineration, food waste segregation and recycling the only waste that will enter the landfill site is approved incinerator ash.

Recommendation(s):

- 1) A description of the type of cover material and the frequency the cover material is moved for the landfill is required. It is a requirement to cover waste within a landfill to avoid wildlife attraction and blown debris.

Topic 32: Waste Management Plan**Comment(s):**

- Appendix A-Waste Management Facilities location photo
- 6 GRAVEL FILTRATION FIELD-The gravel filtration field is located 200 feet from the shoreline and approximately 75 feet elevated from the water level. The dimension of the field is 15 feet wide by 30 feet long by 8 feet deep. All greywater produced by the lodge and its occupants are pumped into it after being separated by the holding tanks.

Recommendation(s):

- 1) The aerial site map of the locations in Appendix A are very low resolution, and what is present in those locations isn't very clear. It is recommended that a higher resolution aerial view with descriptions be included.
- 2) The description of the distance of the gravel filtration field to the shore line of Great Bear Lake, and the water body south of the field, appears to be incorrect when you look at the photo in Appendix A. The correct distance is required to be supplied.

Topic 33: 7 - WASTE MANAGEMENT PLAN REVIEW AND UPDATE**Comment(s):**

The Plan will be reviewed annually, prior to the beginning of each operating season. It will also be reviewed as and when required in between those periods either due to issues recognized by those operating the lodge, by the Land Use Inspector, or by change in regulations, permit conditions, etc.

Recommendation(s):

- 1) ENR recommends that a log book be required for the annual review and required changes at the lodge.

Topic 34: Closure and Restoration Plan, 1 - The Water Intake Facilities**Comment(s):**

- The water intake will be pulled out of the water and brought to Yellowknife.

Recommendation(s):

- 1) It is recommended that the description of the type of equipment used to pump the water and the location of the water intake be provided.

Topic 35: 2 Water Treatment Facility

Comment(s):

- The Water Treatment Facility will be brought to Yellowknife.

Recommendation(s):

- 1) ENR recommends that a description of the type of Water Treatment Facility be submitted.

Topic 36: 3 - Sewage and Solid Waste

Comment(s):

- Contamination remediation - There were no contaminated sites at the time of the issuance of the Type B Water license and there is no anticipated generation of contaminated sites. Should there be an occurrence that results in a contaminated site the contamination will be dealt with according to the approved 'Spill Contingency Plan' attached to the license.
- Hazardous waste – The only hazardous waste on site would be the annual accumulation of used oil and oil filters. These would be returned to Yellowknife.

Recommendation(s):

- 1) GBLLL has been in operation well over 10 yrs. The assertion there are no contaminated sites present is incorrect. The landfill itself is a contaminated site.
- 2) Hazardous waste doesn't include only oil and oil filters. The list of waste is provided in the Waste Management Plan in Table 1. It is recommended that this be corrected.

Topic 37: 4 - The Petroleum and Chemical Storage Areas

Comment(s):

- The company has two airplanes to assist in moving crews in and moving materials out. The vehicles and heavy equipment will be transported to Deline during the summer on the barge that is at the lodge. From there it will be transported to Yellowknife for sale or disposal on the

winter road. This is also how the above ground fuel storage tanks will be removed for resale. There is not any underground fuel storage at the site.

Recommendation(s):

- 1) Within the SCP there is no response for spills from Barges into water. This type of spill response needs to be added to the SCP and the waste accumulated from that type of clean up needs to be added to the Waste Management Plan. The contact for the coast guard also needs to be added to Table 1 Spill response emergency numbers in the SCP.
- 2) The 3rd line in the paragraph, 'From there it will be transported to Yellowknife for sale or disposal on the winter road', needs to be corrected. There is no disposal of any kind on the winter road.

Topic 38: 5 - Any Sites Affected by Waste Spills

Comment(s):

- There were no contaminated sites at the time of the issuance of the Type B Water license and there is no anticipated generation of contaminated sites. Should there be an occurrence that results in a contaminated site the contamination will be dealt with according to the approved 'Spill Contingency Plan' attached to the license.

Recommendation(s):

- 1) A description of the closure of all the sites is to be included in the Closure and Restoration Plan.

Topic 39: 8 – The Potential for Groundwater Contamination

Comment(s):

- We do not expect any ground water contamination. There has never been any ground water contamination. The solid waste pit is over 300 metres away from the waters edge as well as over 20 metres above the water level. The gravel base serves as a natural filter to avoid any contamination.

Recommendation(s):

- 1) Confirmation would be required to prove there is no ground water contamination. It is also recommended that ground water wells be placed in the proper places at the landfill site to verify and prove there is no present contamination and no future contamination. As no liner is in place at the landfill site there is no guarantee groundwater contamination can be avoided or has not already taken place.

Topic 40: 9 - Any Facilities or Area Which May Have Been Affected by Development Such That Potential Pollution Problems Exist

Comment(s):

- Duplicated paragraph under section 9, Once we stop grading the airstrip, the natural vegetation that we prevent from taking it over, would cover the airstrip and return it to its natural state. To promote natural re-vegetation, the company will consult with regulatory agencies to determine if additional steps were required (e.g. re-contouring or scarifying).

Recommendation(s):

- 1) ENR recommends the duplicated paragraph be removed.

Topic 41: 13 APPENDIX A - LOCATIONS OF DISTURBED AREAS, BORROW MATERIAL LOCATIONS AND SITE FACILITIES

Comment(s):

- Map of site

Recommendation(s):

- 1) ENR recommends that a more detailed map is required for the Closure and Restoration Plan.

Topic 42: Wildlife: NWT Listed and Pre-listed Species at Risk

Comment(s):

Sections 76 and 77 of the *Species at Risk (NWT) Act* require the Minister of Environment and Natural Resources to make a submission to the body responsible for assessing the potential impacts of a proposed development, or for considering a Land Use Permit or Water Licence application, respecting the potential impacts of the proposed development, Permit or Licence application on a NWT-listed or pre-listed species or its habitat. NWT-listed species are those that are on the NWT List of Species at Risk. Pre-listed species are those that have been assessed by the NWT Species at Risk Committee (SARC) but have not yet been added to the NWT List of Species at Risk.

The Proponent should be aware that NWT-listed or pre-listed species at risk and their habitat may also be subject to protection under existing sections of the *NWT Wildlife Act*.

As a best practice, ENR encourages the Proponent to consider potential impacts, mitigation measures and monitoring requirements for species at risk listed under the federal *Species at Risk Act*, as well as those designated as at risk by the Committee on the Status of Endangered Wildlife

in Canada (COSEWIC) that may occur in the project area, and the prohibitions that may apply to these species under federal legislation.

The project area overlaps with the ranges of the following NWT-listed and/or pre-listed species:

- [Boreal Caribou](#) – Threatened in the NWT
- [Barren-ground Caribou](#) - Threatened in the NWT
- [Grizzly Bear](#) – Special Concern in NWT
- [Little Brown Myotis](#) (bat) – Special Concern in the NWT

Recommendation(s):

- 1) Although the project overlaps with the range(s) of the species listed above, ENR is of the opinion that the scope, nature, areal extent, scale and/or timing of the proposed project are such that the likelihood of impacts to NWT-listed or pre-listed species at risk is minimal.

Topic 43: Cumulative Effects Tracking

Comment(s):

Keeping track of the disturbance footprint of development activities is an important component of tracking and informing the management of cumulative effects on wildlife and wildlife habitat.

Recommendation(s):

- 1) The Proponent should submit the bounding coordinates or geospatial data for the proposed project footprint and for the completed project footprint to the Land and Water Board for placement on the public registry. The Mackenzie Valley Land and Water Board's "*Standards for Geographic Information Systems (GIS) Submissions*" should be followed when submitting spatial data.

Topic 44: Wildlife Abodes

Comment(s):

Subject to sub-section 51(2) of the *Wildlife Act*, it is illegal to break into, destroy, or damage a den, beaver dam or lodge, muskrat push-up or hibernaculum unless you have an Aboriginal or treaty right or a Permit to do so.

Protection of dens, beaver lodges, muskrat push-ups, and hibernacula is essential to ensuring reproductive success and survival of both adults and young.

Recommendation(s):

- 1) The Proponent should conduct pre-activity surveys within 800m of the project footprint to identify active bear dens if project activities will occur between September 30 and March 30. Surveys should be conducted in the fall to detect freshly dug dens.
- 2) If an active bear den is detected, or suspected, the Proponent should implement and maintain an 800 m exclusion zone until the bear emerges in spring.
- 3) If a bear den and exclusion zone would result in the halt of part or the entire program, the Proponent should contact ENR to discuss alternative mitigation options. The location of active bear dens should be kept confidential between the developer and ENR until after emergence in the spring.
- 4) It is recommended that, if encountered, beaver lodges, muskrat push-ups, and hibernacula are not disturbed or damaged.

Topic 45: Wildlife Attractants and Waste Management

Comment(s):

Subject to sub-section 66(1) of the *Wildlife Act* no person shall store food, waste, or other substances in a manner that may attract big game or other prescribed wildlife and put people, domestic animals, or wildlife in danger.

Subject to sub-section 65(1) of the *Wildlife Act*, it is illegal to intentionally feed big game, furbearers or other prescribed wildlife. Schedule A – Part 2 of the *Wildlife General Regulations* sets out the species prescribed as fur-bearers.

Recommendation(s):

- 1) The Proponent should utilize food and garbage handling and storage procedures that will minimize the attraction of wildlife.
- 2) The Proponent should store all food, waste, washed recyclables and debris that may attract wildlife within sealed animal proof containers until final disposal.
- 3) The Proponent should ensure that sealed animal proof containers are cleaned once emptied to minimize the attraction of wildlife.
- 4) The Proponent should ensure that all grey water (dishwater, showers, laundry, etc.) and black water (sewage) are treated and disposed of in a manner that will minimize the attraction of wildlife.

- 5) The Proponent should remove all waste petroleum products including used oil filters, rags, scrap metal, discarded machinery, parts, drums, barrels, or plastics to an approved waste disposal facility.

Topic 46: General – Plan Revisions

Comment(s):

In the letter sent on May 30, 2018, from the Board to GBLLL for the issuance of Water Licence S17L3-001, it is explained that the Spill Contingency Plan, Waste Management Plan and the Closure and Reclamation Plan were not approved. It is also explained that GBLLL was to submit revised plans, for Board approval, that address reviewer comments and recommendations as per Table 1 in the letter. ENR notes the inclusion of a table of conformance would be helpful to identify where in the plans the revisions were included.

Recommendation(s):

- 1) ENR recommends GBLLL include a table of conformance in each plan noted above that explains where in the updated plan the revisions required in Table 1 were made.

Comments and Recommendations Directed to the Proponent

The following comments are directed to the applicant of the Permit or Licence and are provided based on ENR's mandated responsibilities under the *Environmental Protection Act*, the *Forest Management Act*, the *Forest Protection Act*, the *Species at Risk (NWT) Act*, the *Waters Act* and the *Wildlife Act*. The following comments and recommendations are for the information, consideration, and appropriate action of the Proponent and as they are applicable to project activities.

Legislative and Regulatory Requirements

Topic 1: Forest Management

Recommendation(s):

- 1) In order to comply with the *Forest Protection Act* (Sections 10 and 19(1)), the Proponent should adhere to the *Forest Fire Prevention and Suppression Guidelines*. The intent of the Guidelines is threefold. First, industrial operations must be conducted so that they do not contribute to the fire load. Second, industrial operations must be able to control and extinguish any fires that occur as a result of their operations. Finally, industrial operations must be able to respond to wildfires that may affect human life and other property as a result of their operations. The guidelines may be accessed at the following website:

- 2) The *Forest Management Act* and Regulations prohibits anyone from cutting, using or transporting timber, or damaging standing timber unless:
- Authorized with a Timber Permit;
 - Authorized by license; or
 - Exempted from holding a Permit or license.

The Proponent is requested to contact the local/regional ENR office for further information on obtaining a Forest Management Authorization, if required.

- 3) If the Proponent plans to burn brush or other materials during the official fire season (May 01 – September 30), they will require a Permit to Burn from ENR, as per the *Forest Protection Act* (Section 10(1) and 21).
- 4) The Proponent should be aware of Part 1 Clause 18 of the *Exemption List Regulations* under the *Mackenzie Valley Resource Management Act* in which a burn authorized under a Permit to Burn is exempt from Preliminary Screening if it is not greater than an area of 25 m².
- 5) If the site brush and tree cover is not merchantable then it should be piled up accordingly (and not mixed with soil) so that it can be burned or spread out at a later date. If merchantable wood is involved, either merchantable firewood or saw timber, it should be cleanly set to one side of the operation and made available for recovery. The Proponent should contact the local ENR office to determine what forest management authorization will be required, if any.

Topic 2: Wildlife Abodes

Comment(s):

Subject to sub-section 51(2) of the *Wildlife Act*, it is illegal to break into, destroy or damage a den, beaver dam or lodge, muskrat push-up or hibernaculum unless you have an Aboriginal or treaty right or a Permit to do so.

Protection of dens, beaver lodges, muskrat push-ups, and hibernacula is essential to ensuring reproductive success and survival of both adults and young.

Recommendation(s):

- 1) Contact ENR if there are any known dens, push-ups, lodges, beaver dams or hibernacula within the project area.

2) Prior to start-up of project activities, conduct surveys of lakes or other water bodies proposed to be used for water withdrawal or winter access roads to determine the presence of muskrat push-ups, beaver lodges or beaver dams. If one or more of these features is found contact ENR to discuss mitigation options.

3) Further guidance on different setback distances and timing windows for wildlife abodes are provided in Table 6 of the Northern Land Use Guidelines: Northwest Territories Seismic Operations Vol.9 (a) at:

http://www.lands.gov.nt.ca/sites/lands/files/resources/nlug_seismic_2015_english_-_16_sept_2015.pdf

Proponents should also check whether there are setback distances and timing restrictions for wildlife abodes within the regional land use plan for their project area.

Topic 3: Advice for NWT Listed and Pre-listed Species at Risk

Comment(s):

Sections 76 and 77 of the *Species at Risk (NWT) Act* requires the Minister of Environment and Natural Resources to make a submission to the body responsible for assessing the potential impacts of a proposed development, or for considering a Land Use Permit or Water Licence application, respecting the potential impacts of the proposed development, Permit or Licence application on a NWT-listed or pre-listed species or its habitat. NWT-listed species are those that are on the NWT List of Species at Risk. Pre-listed species are those that have been assessed by the NWT Species at Risk Committee (SARC) but have not yet been added to the NWT List of Species at Risk.

The Proponent should be aware that NWT-listed or pre-listed species at risk and their habitat may also be subject to protection under existing sections of the NWT *Wildlife Act*.

As a best practice, ENR encourages the Proponent to consider potential impacts, mitigation measures and monitoring requirements for species at risk listed under the federal *Species at Risk Act*, as well as those designated as at risk by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) that may occur in the project area, and the prohibitions that may apply to these species under federal legislation.

The project area overlaps with the ranges of the following NWT-listed and/or pre-listed species:

- [Boreal Caribou](#) - Threatened
- [Barren-ground Caribou](#) - Threatened
- [Grizzly Bear](#) - Special Concern
- [Little Brown Myotis](#) - Special Concern

Recommendation(s):

1) For information on NWT species at risk in the project area please consult:

- <http://www.nwt-species-at-risk.ca/SpeciesAtRisk>
- <http://www.nwt-species-at-risk.ca/ToolsForDevelopers>
- [Species at Risk in the NWT - 2016 Edition](#)

The Proponent should be aware of the prohibitions that may apply to the species that occur in your area. Check the *Species at Risk (NWT) Act* regulations webpage (<http://www.nwt-species-at-risk.ca/ToolsForDevelopers>) to see if there are any applicable regulations or agreements with land owners that must be followed for NWT-listed or pre-listed species at risk.

- 2) For information and legislative requirements related to federally-listed species at risk, consult the Species at Risk Public Registry (www.sararegistry.gc.ca) or contact Environment and Climate Change Canada or the Department of Fisheries and Oceans.
- 3) Ensure that employees and contractors are aware of the species at risk that might occur in the project area. This includes species that are pre-listed or listed under the *Species at Risk (NWT) Act*, species listed under the federal *Species at Risk Act*, and species designated as at risk by COSEWIC.
- 4) If species at risk are encountered during project undertakings, the primary mitigation measure should be avoidance. The Proponent should avoid contact with or disturbance to each species, its habitat and/or its residence.
- 5) Monitoring should be undertaken by the Proponent to determine the effectiveness of mitigation and/or identify where further mitigation is required. As a minimum, monitoring should include recording the locations and dates of any observations of species at risk, behaviour or actions taken by the animals when project activities were encountered, and any actions taken by the Proponent to avoid contact with or disturbance to the species, its habitat, and/or its residence.
- 6) Submit sightings of species at risk and monitoring information to ENR's Wildlife Management Information System (WMIS) and to other appropriate regulators and organizations with management responsibility for the species as may be necessary at:

<http://www.enr.gov.nt.ca/programs/wildlife-research/wildlife-management-information-services>

Further information on the WMIS can be found at:

<http://www.enr.gov.nt.ca/programs/wildlife-research/wildlife-management-information-services>

Topic 4: Cumulative Effects Tracking

Comment(s):

Keeping track of the disturbance footprint of development activities is an important component of tracking and informing the management of cumulative effects on wildlife and wildlife habitat.

The consistent collection and posting of spatial data by Land and Water Boards from project proponents would assist greatly in the mapping of land and water disturbances in the territory. This is a key piece in the understanding of cumulative effects. ENR-NWT Cumulative Impact Monitoring Program currently populates a human disturbance data layer, available as part of the 'Inventory of Landscape Change', that is derived from satellite imagery and interpretation of public registry documents. It is a cumbersome process that could be improved by submission to the public registry of standardized spatial data from all permit holders that create a physical footprint on the land.

Recommendation(s):

- 1) The Proponent should submit the bounding coordinates, or geospatial data for the proposed project footprint and for the completed project footprint to the Land and Water Board for placement on the public registry. The MVLWB's "Standards for Geographic Information Systems (GIS) Submissions" should be followed when submitting spatial data.

Topic 5: Nesting Birds

Comment(s):

- Conducting activities involving vegetation clearing, ground disturbance or demolition of buildings and other structures during the nesting season increases the risk of contravening paragraph 51(1)(a) of the *Wildlife Act* which prohibits destroying, disturbing, or taking the eggs of a bird or a nest when it is occupied by a bird or its eggs, or destroying, disturbing, or taking the nest of a prescribed bird at any time.
- Protection of nests is essential to ensuring reproductive success and survival of both adults and young.
- The Canadian Wildlife Service of Environment and Climate Change Canada (ECCC) is the responsible management authority for migratory birds protected under the Migratory Birds Convention Act, 1994.

<https://ec.gc.ca/nature/default.asp?lang=En&n=496E2702-1>

- GNWT is responsible for the management of non-migratory birds including raptors.

- Critical breeding periods for NWT raptors can start as early as the 1st week of April and last up until 3rd week of September, depending on the species and location.

Recommendation(s):

- 1) Follow ECCC's Avoidance Guidelines related to incidental take of migratory birds in Canada available at:

<http://www.ec.gc.ca/paom-itmb/default.asp?lang=En&n=AB36A082-1>)

- 2) Consult ECCC's *General Nesting Periods of Migratory Birds in Canada* for current information on general nesting periods of federally protected migratory birds that occur within the NWT. Available at:

<http://www.ec.gc.ca/paom-itmb/default.asp?lang=En&n=4F39A78F-1>

- 3) Contact ENR, Wildlife Division for information on critical breeding periods for raptors and/or known raptor nest sites in the project area.
- 4) Conduct vegetation clearing and any new ground disturbance outside of the nesting season for birds in the project area.
- 5) If active nests are encountered during project activities implement protective buffer zones described in the regional land use plan, Table 6 of the Northern Land Use Guidelines – Seismic) or ECCC's Recommended *Buffer Zones and Setback Distance* available at:

http://www.ec.gc.ca/paom-itmb/default.asp?lang=En&n=8D910CAC-1#_03_1_1

Topic 6: Wildlife Disturbance and Harassment

Comment(s):

Unless authorized by a Licence or Permit, paragraphs 52(a) and (b) of the *Wildlife Act* prohibit engaging in an activity that is likely to result in significant disturbance to big game or other prescribed wildlife, or to unnecessarily chase, fatigue, disturb, torment or otherwise harass game or other prescribed wildlife.

Schedule A – Part 1 of the *Wildlife General Regulations*, sets out the species prescribed as big game, and Schedule B sets out prescribed wildlife for the purpose of paragraphs 52(a) and (b) of the *Wildlife Act*.

Disturbance to wildlife from sources such as noise, light, vibrations, and human presence can result in energetic stress, avoidance of key habitat, loss of reproductive fitness, injury or mortality of wildlife. Activities that may cause sensory disturbance to wildlife include vehicle

traffic, stationary machinery, noise from blasting, excavation, crushing, seismic testing, vegetation clearing, and lighting or flaring.

Recommendation(s):

- 1) The Proponent should be aware that no wildlife should be disturbed, chased, or harassed by human beings on foot, in a motorized vehicle, or by aircraft. Unless authorized by a Licence or Permit, paragraphs 52(a) and (b) of the *Wildlife Act* prohibit engaging in an activity that is likely to result in significant disturbance to big game or other prescribed wildlife, or to unnecessarily chase, fatigue, disturb, torment or otherwise harass game or other prescribed wildlife. However, subject to section 55 of the *Wildlife Act* a person may chase wildlife away from a camp or work site if doing so is necessary to prevent injury or death to a person or damage to property.
- 2) Consult the setback distances, flight altitude guidelines and timing windows for wildlife provided in Tables 6 and 7 of the Northern Land Use Guidelines: Northwest Territories Seismic Operations Vol.9 (a) as they are applicable to variety of land use activities:

[http://www.lands.gov.nt.ca/sites/lands/files/resources/nlug_seismic_2015_english - 16 sept 2015.pdf](http://www.lands.gov.nt.ca/sites/lands/files/resources/nlug_seismic_2015_english_-_16_sept_2015.pdf)
- 3) Consult the approved Land Use Plan, if applicable, that applies to the project area for further guidance on setback distances and timing windows to minimize disturbance to wildlife.
- 4) Wildlife shall be given the right of way at all times.
- 5) Suspend activities temporarily if one or more individuals of a big game species are spotted within five hundred (500) metres of the work site.

Topic 7: Reporting Wildlife Sighting

Comment(s):

Proponents are encouraged to record wildlife sightings and to submit these records to ENR's WMIS. Wildlife sightings data provides useful information for assessing changes in species distribution and the timing and location of different life history events such as migration, denning, nesting, calving, etc.

Recommendation(s):

- 1) Submit information about wildlife sightings (species, date, time, location, number of individuals, sex, behaviour, etc.) to WMIS at WMISTeam@gov.nt.ca. For further information on the WMIS consult:

<http://www.enr.gov.nt.ca/programs/wildlife-research/wildlife-management-information-services>

- 2) Contact the Sahtu Regional ENR office at 867-587-3500 to obtain blank wildlife sightings forms.

Topic 8: Reporting Wildlife Defence/Property Kills and Wildlife Incidents

Comment(s):

Subject to paragraph 57(a) of the *Wildlife Act*, any big game or other prescribed wildlife that is killed to prevent injury or death to a person or damage to property must be reported to ENR as soon as is practicable. Section 7 of the *Wildlife General Regulations* describes what information must be included in the report.

Subject to section 58 of the *Wildlife Act* and sub-section 8(1) of the *Wildlife General Regulations*, any person who accidentally kills or seriously wounds big game or other prescribed wildlife with a motorized vehicle on a highway must report the event to an officer within 24 hours after the incident.

Recommendation(s):

- 1) Report all sightings of bears in and around the project location to your local ENR office. Any defence of life and property kills must be reported to the appropriate ENR office immediately. Please contact the following Regional Office as required:
 - Sahtu Region Wildlife Emergency Line at (867)-587-2422
- 2) Ensure all field personnel have completed a bear safety training course to decrease the risk of attracting bears to work sites and threats to human safety, learn how to respond to bear encounters, and decrease the risk of wildlife mortality resulting from kills in defence of life and property.
- 3) Consult the “Safety in Grizzly Bear and Black Bear Country” brochure, available at:

http://www.enr.gov.nt.ca/sites/enr/files/resources/safety_in_grizzly_and_black_bear_country_english.pdf
- 4) Report to an ENR officer as soon as is practicable any wildlife that is killed to prevent injury or death to a person or damage to property.
- 5) Report to an ENR officer any big game or other prescribed wildlife that is killed or seriously wounded by any motorized vehicle, or a motorized vehicle on a highway within 24 hours after the incident.

- 6) Reports must include at minimum the name of the person who killed or injured the wildlife, an explanation of the incident, the time, date and location of the incident, the species or quantity involved, and any other information requested by the wildlife officer.
- 7) Contact the Sahtu Regional ENR office to obtain blank wildlife incident forms at (867)587-3500.

Topic 9: Wildlife Attractants and Waste Management

Comment(s):

Subject to sub-section 66(1) of the *Wildlife Act* no person shall store food, waste, or other substances in a manner that may attract big game or other prescribed wildlife and put people, domestic animals or wildlife in danger.

Subject to sub-section 65(1) of the *Wildlife Act*, it is illegal to intentionally feed big game, furbearers or other prescribed wildlife. Schedule A – Part 2 of the *Wildlife General Regulations* sets out the species prescribed as fur-bearers.

Recommendation(s):

- 1) Waste being stored on site prior to being transported to a landfill or municipal landfill site, or disposed by other methods, must be stored in a manner that minimizes the attraction of wildlife, as it is a violation of *Section 66(1) of the Wildlife Act*. An animal proof, sealed container must be used for storing waste onsite to minimize wildlife being attracted to odours. For reference please refer to the following guidance document “Safety in Grizzly and Black Bear Country”

http://www.enr.gov.nt.ca/sites/enr/files/resources/safety_in_grizzly_and_black_bear_country_english.pdf

- 2) Project personnel should not intentionally feed wildlife or purposefully encourage wildlife to habituate to human presence.

Comments and recommendations were provided by ENR technical experts in the Water Management and Monitoring Division, NWT CIMP and the Sahtu Region and were coordinated and collated by the Environmental Assessment and Monitoring Section (EAM), Environmental Stewardship and Climate Change Division.

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.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Clancy', written in a cursive style.

Patrick Clancy
Environmental Regulatory Analyst
Environmental Assessment and Monitoring Section
Environmental Stewardship and Climate Change Division
Department of Environment and Natural Resources
Government of the Northwest Territories



May 9, 2019

Bonnie Bergsma
Regulatory Specialist
Sahtu Land and Water Board
Box 1, Fort Good Hope
Northwest Territories
X0E 0H0

Dear Ms. Bergsma,

**Re: Great Bear Lake Lodge Ltd. (GBLLL)
Water Licence Renewal Application – S19L3-001
Spill Contingency Plan Version 4.0
Waste Management Plan Version 3.0-
Closure and Restoration Plan Version 3.0
Request for Review and Comments**

The Department of Environment and Natural Resources (ENR), Government of the Northwest Territories has reviewed the plans at reference based on its mandated responsibilities under the *Environmental Protection Act*, the *Forest Management Act*, the *Forest Protection Act*, the *Species at Risk (NWT) Act*, the *Waters Act* and the *Wildlife Act* and provides the following comments and recommendations for the consideration of the Board.

Topic 1: Revisions Table

Comment(s):

The table at the beginning of the Spill Contingency Plan outlines the version control & revisions. This table explains that for version 4.0, comments have been addressed and due to the volume of changes made, a separate table has been made documenting changes for this version. ENR could not locate the table that documents changes for this version.

Recommendation(s):

- 1) ENR recommends GBLL provide the table documenting changes for version 4.0 in the Spill Contingency Plan.

Topic 2: References

Comment(s):

ENR comment #14 requested GBLI to reformat the Spill Contingency Plan by placing the references at the end of the document. As well, ENR comment #27 recommended GBLI remove outdated standards, guidelines, acts or regulations that are included in the references list. In response, GBLI has removed the entire reference list in the updated plan (version 4.0).

Recommendation(s):

- 1) ENR recommends GBLI ensure all references such as standards, guidelines, acts or regulations that were used in the creation of the plan are included in the Spill Contingency Plan.

Topic 3: Revisions Table

Comment(s):

The Waste Management Plan and the Closure and Reclamation Plan both contain a table that outlines the version control & revisions. In each plan, the most recent version has not been included (version 3.0).

Recommendation(s):

- 1) ENR recommends GBLI ensure subsequent updates to any plans include an accurate table outlining the version control & revisions.

Topic 4: Incineration Details

Comment(s):

Previous comments recommended GBLI provide further details concerning incineration at site. In Section 4 of the updated version of the Waste Management Plan, the description of incineration is still limited to types of waste acceptable for incineration and, sampling and depositing ash.

Recommendation(s):

- 1) ENR recommends GBLI update the Waste Management Plan to clarify:
 - the selected incineration technology and rationale for selection;
 - the procedures for operation and maintenance; and,
 - operator training and qualifications.

Comments and recommendations were provided by ENR technical experts in the Water Resources Division, NWT CIMP and the Sahtu Region and were coordinated and collated by the Environmental Assessment and Monitoring Section (EAM), Environmental Stewardship and Climate Change Division.

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.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Clancy', written in a cursive style.

Patrick Clancy
Environmental Regulatory Analyst
Environmental Assessment and Monitoring Section
Environmental Stewardship and Climate Change Division
Department of Environment and Natural Resources
Government of the Northwest Territories