
From: Breadmore, Ron (he-il) <ron.breadmore@rcaanc-cirnac.gc.ca>
Sent: Tuesday, July 2, 2024 4:54 PM
To: Larose, Megan <Megan.Larose@rcaanc-cirnac.gc.ca>; Richardson, Andrew <andrew.richardson2@rcaanc-cirnac.gc.ca>
Cc: Nissen, Erika (she-elle) <Erika.Nissen@rcaanc-cirnac.gc.ca>; Robinson, Blair (SPAC/PSPC) <Blair.Robinson@tpsgc-pwgsc.gc.ca>; Eriksson, Jasmine (SPAC/PSPC) (elle-la / she-her) <Jasmine.Eriksson@tpsgc-pwgsc.gc.ca>; Janice Lee <Janice.Lee@tpsgc-pwgsc.gc.ca>; Roesch, Michael <michael.roesch@rcaanc-cirnac.gc.ca>; Anneli Jokela <ajokela@wlwb.ca>
Subject: RE: Rayrock (W2020L8-0003) Use of portable wastewater storage

Thank you, Megan.

Our Project Team will continue to provide you with new information as soon as it becomes available, and we'll be sure to include these details, supported with photos where possible, within the Daily Reports. We will be able to provide another update when we meet on July 4th with Board staff.

We appreciate your understanding and support as we continue to seek out solutions to this challenging situation.

Best regards,

Ron

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From: Larose, Megan <Megan.Larose@rcaanc-cirnac.gc.ca>
Sent: Tuesday, July 2, 2024 4:15 PM
To: Richardson, Andrew <andrew.richardson2@rcaanc-cirnac.gc.ca>; Breadmore, Ron (he-il) <ron.breadmore@rcaanc-cirnac.gc.ca>
Cc: Nissen, Erika (she-elle) <Erika.Nissen@rcaanc-cirnac.gc.ca>; Robinson, Blair (SPAC/PSPC) <Blair.Robinson@tpsgc-pwgsc.gc.ca>; Eriksson, Jasmine (SPAC/PSPC) (elle-la / she-her) <Jasmine.Eriksson@tpsgc-pwgsc.gc.ca>; Janice Lee <Janice.Lee@tpsgc-pwgsc.gc.ca>; Roesch, Michael <michael.roesch@rcaanc-cirnac.gc.ca>; Anneli Jokela <ajokela@wlwb.ca>
Subject: Rayrock (W2020L8-0003) Use of portable wastewater storage

Hello Rayrock Project Team,

On June 10, 2024 an Inspector's Order was issued to the Rayrock Project Team regarding the unauthorized construction and use of a wastewater containment structure. Remedial measures to address the situation were issued and are discussed further below.

On June 25, 2024 CIRNAC-CARD communicated that in response to the Order, consideration was being given to the use of portable water tanks within the wastewater containment structure to store future non-compliant wastewater. On June 28, 2024 the Inspector asked for additional information about the proposed use of portable water tanks, including the size and number of portable tanks, plans for monitoring, and the timeline for use. The Inspector advised that the additional information was required before a decision would be made to authorize the use of the portable water tank.

CIRNAC-CARD responded on June 28, 2024 with the volume (80,000 US Gallons or approximately 300,000 litres) and size (5 ft tall x 27.5 ft wide x 110 ft long) of the portable tank (1), and also indicated that a portable tank had already been purchased and was being shipped to site. The Inspector reiterated that use of the portable tank was not authorized and asked for more detail regarding the holding capacity of the wastewater containment structure and the portable water tank. The holding capacities were provided by email on June 29, 2024, as was an explanation of the value the additional storage capacity would have for the on-going work to improve the performance of the water treatment plant. This was further discussed during the July 2, 2024 weekly project meeting.

Taking into consideration the information provided, the following updates to the remedial measures (in red) are provided to CIRNAC-CARD.

Remedial Measures

Under the authority of Section 86.1(1) of the *Act*, the Inspector orders CIRNAC-CARD, the licensee, to take the following remedial measures:

- Immediately discontinue use of the wastewater containment structure to store wastewater of any kind
 - Temporary use of the wastewater containment structure as secondary containment for the portable water tanks is authorized for a period of three weeks (i.e., until July 23, 2024).
 - If continued use of the wastewater containment structure and portable water tank are required after June 23, 2024, CIRNAC-CARD may request an extension and provide rationale for the additional time requested.
 - While in use, the wastewater containment structure and portable water tank must be monitored visually for any leaks, spills, or other noticeable changes to standing water inside and outside the wastewater containment structure. This is to be completed at least once daily, more frequently in the event of a precipitation event.
 - Transfer of wastewater into or out of the wastewater containment structure and portable water tank, must be monitored for the duration of the transfer, this includes observation of the full length of pipeline for leaks during wastewater transfer.
 - Report any spills, leaks, or other noticeable changes to standing water to the Inspector immediately.

- Install fencing around the structure to limit the potential for wildlife interaction within four weeks of the issuance of this order

- No work on installation of a wildlife fence has occurred to the knowledge of the Inspector.
 - On-site wildlife monitors visit the wastewater containment structure area multiple times per day; no wildlife sign has been observed or reported.
 - Provided the wildlife monitors continue to visit the wastewater containment structure area multiple times per day, and no wildlife sign is observed; the Inspector is agreeable to this approach for the duration of this construction season.
 - Changes in wildlife activity will result in the need to revisit this requirement.
- Monitor the containment structure daily for additional water collection that requires removal and for potential wildlife interaction; include the results of this monitoring in daily reports
 - It is acknowledged that the daily reports typically include a photo and general comment about the wastewater containment structure
- Prepare a plan within 30 days of the issuance of this order, to safely remove any water from the containment structure and decommission the containment structure before the end of the summer construction season
 - A formal decommissioning plan has not yet been received. The timeline to submit this plan to the Inspector is July 10, 2024.
 - Include plans for removal, storage and/or appropriate disposal of the portable tank in the decommissioning plan.
 - On July 2, 2024 during the weekly project meeting, it was communicated that wastewater that remains in the wastewater containment cell may be pumped into the portable water tank once it is setup within the containment structure. This has not been confirmed in writing.
- Provide written bi-weekly updates on the status of the wastewater containment structure, progress made on plans to dewater and decommission the wastewater containment structure, and progress made on addressing issues with the water treatment plant meeting discharge criteria
 - The first bi-weekly update was provided to the Inspector on June 25, 2024.
 - Please include an approximate schedule for optimizing the wastewater treatment plant, ramping up water treatment volumes, and timeline to treat the backlog of wastewater on-site in the next bi-weekly update. It is understood that there may be some uncertainty in the schedule; however, a target schedule is requested.
- Should the licensee be of the opinion that the wastewater containment structure is a necessary component of the camp wastewater treatment process and is required to carry out the Project, the Inspector recommends that the licensee submit an application to amend the Water Licence prior to August 31, 2024. If this option is chosen by the licensee, the requirement to decommission the containment structure would not be required.
 - If a decommissioning plan is not received on July 10, 2024, CIRNAC-CARD is reminded that the timeline to submit an application to amend the water licence to include the use of a wastewater containment structure to deposit waste (i.e., camp wastewater) is August 31, 2024.
 - Should CIRNAC-CARD be considering the use of the wastewater containment structure long term, amendments to the Waste Management Plan, and potentially the Spill Contingency Plan will also be required as the use of a wastewater containment structure is not currently considered in these plans. If CIRNAC-CARD is of the opinion

that amendments to these management plans are not required, provide evidence from the approved management plans to support this rationale.

Please reach out to Erika and I should you have any questions or concerns.

Regards,
Megan

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