

June 24, 2024

Ms. Janice Lee, P.Eng Project Manager  
Public Services and Procurement Canada  
Western Region Environmental Services  
Northern Contaminated Sites Program  
5101- 50th Avenue, Room 316  
Yellowknife, NT X1A 2P1

**Our Reference**  
60693486

## **Unauthorized Wastewater Containment Structure - Update on Remedial Measures**

Dear Janice,

The Rayrock Remediation Project will be mostly undertaken from 2024 to 2026 to address various environmental concerns at the abandoned uranium mine site. Complete details of the remediation are provided in the Remedial Action Plan, Version 2.0 addendum (CARD-CIRNAC, 2022) and Remedial Action Plan (AECOM, 2020). To support remedial construction activities, a camp has been established at the Rayrock site, including a camp wastewater treatment facility. These facilities are authorized through the Type A Water Licence (W2020L8-0003) and a Type A Land Use Permit (W2020X0005) issued on November 18, 2021 to Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) Contaminants and Remediation Division (CARD) by the Wek'èezhii Land and Water Board (WLWB).

During May 2024, a wastewater containment structure was constructed on site by the general contractor and wastewater was discharged to the containment structure without prior authorization from an Inspector or the WLWB. In a letter dated June 10, 2024, the CIRNAC Inspector issued orders for remedial measures relating to the unauthorized wastewater containment structure. This letter provides an update for each of these orders.

### **Immediately discontinue use of the wastewater containment structure to store wastewater of any kind.**

No further discharge has been undertaken to the wastewater containment structure since issue of the issue of the Notice from the Inspector.

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

The contractor is working toward discharging the water from the containment facility and decommissioning it prior to the need to install a fence. Should decommissioning be unable to occur in a timely fashion and a fence be required, fencing is available in Edmonton and will be sent to site for installation.

### **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.**

Daily inspections have been conducted of the containment structure. There has been little precipitation on site in the last two weeks and no additional water has accumulated in the structure. No evidence of wildlife interaction has been found around the 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.**

The plan for water removal and decommissioning of the containment structure is in development and will be provided to the Inspector when complete. If the wastewater in the containment cell meets the required Environmental Quality Criteria (EQC), the wastewater will be discharged to the drainage field. If the water does not meet EQC, it will be directed to the camp wastewater treatment plant for further treatment prior to discharge.

**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 of wastewater containment structure currently contains camp wastewater plant effluent and the contractor is awaiting confirmation of achieving the required effluent quality criteria. The liner remains in place, there is no evidence of erosion around the containment facility, nor has there been any incidents involving wildlife related to the facility. The water level in the containment facility has decreased due to evaporation. Please see the attached photos showing the current condition of the containment structure (Attachment 1).

Equipment has been procured in an attempt to fix the camp the camp wastewater treatment system. In the meantime, on-site holding tanks for the process water treatment system have been repurposed for contingency wastewater storage. Three people have been hired by the contractor related to water treatment.

If you require any additional information, please do not hesitate to contact the undersigned.

Yours sincerely,



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Attachments: Attachment 1 – Wastewater Containment Facility Photos

**Attachment 1**  
**Wastewater Containment Structure Photos**



**June 17, 2024**



**June 19, 2024**



**June 20, 2024**