



Environment and Natural Resources
Government of the Northwest Territories
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Inuvik NT X0E 0T0

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March 15, 2016

GNWT Department of Transportation
PO Box 2038
Inuvik NT X0E 0T0

Attn: Dean Ahmet, Senior Program Manager

**RE: INDUSTRIAL Water Use N7L1-1835
CLASS A - INDUSTRIAL
ITH North End**

Dear Mr. Ahmet,

A ground inspection of the above noted operation was conducted on March 4, 2016 by Water Resource Officer Philippe Thibert-Leduc and Environmental Protection Officer Rolland Malegana. An aerial inspection was also conducted jointly with the Department of Lands on March 9, 2016. Enclosed is a copy of the Industrial Water Use Inspection Report.

There are terms and conditions of your Water Licence that are being neglected resulting in non-compliance/violations. Please address the concerns noted in this inspection report as quickly as possible.

A copy of this report will be sent to the Inuvialuit Water Board for their review and public records. If you have any questions/concerns regarding the enclosed, please do not hesitate to contact me at (867) 678-6676.

Sincerely,

A handwritten signature in black ink, appearing to read "P. Thibert-Leduc", is written in a cursive style.

Philippe Thibert-Leduc
Water Resource Officer
GNWT ENR Inuvik Region

Cc: Stephen Charlie – Superintendent, GNWT ENR Inuvik Region
Mardy Semmler – Executive Director, Inuvialuit Water Board
Bijaya Adhikari – Science and Regulatory Coordinator, Inuvialuit Water Board
Doug Saunders – Operations Manager, E. Gruben's Transport Ltd
Alexis Campbell – Environmental Analyst, DOT
Scott Lundrigan – Field Environment Coordinator, DOT

Enclosure: Industrial Water Use Inspection Report (3 pages)

INDUSTRIAL WATER USE INSPECTION REPORT

LICENCE #:	N7L1-1835	EXPIRY DATE:	December 11, 2023
LICENCEE:	Government of the Northwest Territories - Department of Transportation	PREVIOUS INSPECTION:	February 12, 2016
COMPANY REP:	Dean Ahmet, Senior Program Manager	INSPECTION DATES:	March 4, 2016 / March 9, 2016

WATER SUPPLY

Source:	Approved Water Sources	Quantity Used:	N/I
Owner/Operator:	EGT Northwind	Meter Reading:	N/A

Indicate: **A - Acceptable** **U - Unacceptable** **N/A - Not Applicable** **N/I - Not Inspected**

Intake Facilities	N/A	Storage Structures	A	Treatment Systems	N/A	Recycling	N/A
Flow Meas. Device	N/I	Conveyance Lines	N/A	Pumping Stations	N/A	Chem. Storage	A
Water Truck	U ¹	Modifications	N/A				

Water Supply Comments:

- ¹At the time of the ground inspection on March 4, 2016, a water truck was withdrawing out of Approved Water Source KP61. Drip tray was missing and various materials were being stored long-term on the ice (e.g. propane, spare parts for hose, shovels, etc.) (Figure 1). The operator on site was notified and asked to follow best management practices.
- On March 9, 2016, culverts and other materials were observed on the surface of KP 61 (Figure 2).
- As of March 9, 2016, Approved Water Sources KP61 and KP82a are in use.

WASTE DISPOSAL – SOLID WASTE

Disposal Method		Trucked out					
Open Dump	N	Landfill	N	Burn & Landfill	N	Underground	N
Offsite Removal	Y	Other	Incinerator will be used to dispose of household wastes as per the Waste Management Plan.				
Owner / Operator	EGT Northwind						

Indicate: **A - Acceptable** **U - Unacceptable** **N/A - Not Applicable** **N/I - Not Inspected**
Y - Yes **N - No**

Solid Waste Comments:

- The Waste Management Plan submitted as a supporting document of the Water Licence was inspected during the ground inspection on March 4, 2016. Incinerator (model Westland CY-2050-FS-D) inspected at the mobile camp by Borrow Source 174. Area was clean looking and tidy. Ashes are stored in metal containers and properly sealed before being shipped out to registered receiver as per the Waste Management Plan.
- Maintenance foreman at camp 174 confirmed that all wastes generated at the mobile camps are segregated prior to being incinerated. The foreman tracks wastes and use of incinerator on spreadsheets, and reports to superintendent on a bi-weekly basis.
- A second incinerator (same model) was inspected at mobile camp 312 at the time of the aerial survey on March 9, 2016 (Figure 3). No concerns to report.
- All aspects with regards to solid wastes were satisfactory at the time of the inspection.

GENERAL CONDITIONS/REPORTS/PLANS

Indicate: **A - Acceptable** **U - Unacceptable** **N/A - Not Applicable** **N/I - Not Inspected**

C & R Plan	N/I	Records & Reporting	N/I	Final Report	N/I
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INDUSTRIAL WATER USE INSPECTION REPORT

Geotechnical Inspection	N/I	Posting, Signage	N/I	Contingency Plan	N/I
Restorations Activities	N/I	Spills	A	O&M Plan	N/I
Maintenance	A	Modifications	U ¹	Annual Report	N/I

General Comments:

- A ground inspection of the north end was conducted by Water Resource Officer Philippe Thibert-Leduc and Environmental Protection Officer Rolland Malegana on March 4, 2016. At the time of the ground inspection, crews were working out of Borrow Sources 174 and 312.
- Overall, camps at 174 and 312 appeared to be clean and tidy (Figures 4 and 5). No environmental concerns to report with regards to storage of fuel and sewage.
- A joint aerial inspection was conducted on March 9, 2016, with Department of Lands and Department of Environment and Natural Resources Inspectors. Borrow Sources 174 and 312 were inspected in the north end. Inspectors met with EGT Gruben Superintendent to discuss proposed amendments to 312 Pit Development Plan (PDP).
- As of March 9, 2016, there is limited activity out of Borrow Source 174 and the mobile camp. The end of the spread was marked at approximately KM 56 (Figure 6).
- No run-off observed at Borrow Sources 174 and Borrow Sources 312. Changes to 312 PDP address drainage channel diversions.
- Understanding that the construction season is soon coming to an end, please ensure that all stockpiled materials in all Borrow Sources meet the requirements of the approved PDPs.
- Operator is to be commended for consistently reporting spills to the NWT spill line and providing a sufficient amount of detail.

Concerns:

- ¹On March 1, 2016, the Inuvialuit Water Board (IWB) approved the Source 312 West PDP subject to certain provisions. On March 7, 2016, the Licensee failed to directly notify and submit a request to amend the approved Source 312 West PDP to the IWB. This is a violation of Part F: Conditions Applying to Modifications, Item 1 of the Water Licence. The Licensee is responsible for directly submitting any PDPs for approval and any notice of modifications to PDPs. The request to amend GSC4 and 312 PDPs was withdrawn on March 14, 2016.

NON-COMPLIANCE/VIOLATIONS OF ACT OR LICENCE

Part F: Conditions Applying to Modifications, Item 1,

“Except for those Engineered Structures addressed by Part C, Item 4 the Licensee may, without written approval from the Board, carry out Modifications to the planned Project provided that such Modifications are consistent with the terms of this Licence and the following requirements are met:

- a) The Licensee has notified the Board and an Inspector in writing of such proposed Modifications at least twenty (20) days prior to beginning the Modifications; [...]

Please work with the Board and the Water Resource Officer to resolve information gaps raised by the Board in a letter addressed to Mr. Kevin McLeod, sent on March 1, 2016 (attached).

Inspector's Signature: _____



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INDUSTRIAL WATER USE INSPECTION REPORT

Inspection Images:

Figure 1

Water truck at KP61 without drip tray on March 4, 2016.
Various materials stored on site.



Figure 3

Incinerator at the mobile camp by Borrow Source 312.



Figure 5

Mobile camp by Borrow Source 312. Lots of activity.



Figure 2

View of access to KP61 as seen on March 9, 2016. Culverts and other materials stored on the ice. Previously flagged materials removed.



Figure 4

Mobile camp by Borrow Source 174. Limited activity.



Figure 6

End of spread as of March 9, 2016. Approximately KM 56.

