

## AlecSandra Macdonald

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**From:** Katie Oliver <koliver@kblenv.com>  
**Sent:** August 23, 2022 3:34 PM  
**To:** AlecSandra Macdonald; Leonard DeBastien; Lloyd Gruben  
**Cc:** Norman Snowshoe; Wendy Bidwell; Jeff Dirks; Richard Reimer; Lance Hayman  
**Subject:** RE: Water Licence Inspection Report\_KBL Environmental Ltd\_ G17L1 -002, July 28, 2022  
**Attachments:** 2022-07-28 Discharge point.JPG; 2022-08-22 KBL Facility - Reported cracks inspection.jpg; 2022-08-22 KBL Facility confirmation of fencing.jpg

Good Afternoon Lloyd;

Thank you for the inspection report. Please see below for updates to the action items / comments in the report.

- A. During the inspection it was noted that the SNP station 0037-3 (Drainage Ditch) was not signed. Please post a sign at this SNP station location.
    - a. A sign was present at SNP station 0037-3 (Drainage Ditch) during the inspection. Please see attached a photo of the SNP location in question dated July 28<sup>th</sup>, 2022.
  - B. Check if fencing has been erected to prevent wildlife from entering the facility.
    - a. KBL can confirm that fencing has been installed. Please see attached a picture of the fencing.
  - C. Check if maintenance work has been done to correct cracking along facility berms to prevent structural collapse, or release of contaminants.
    - a. Inspection of the reported cracks indicate that they caused by rain and/or settling at the site. Repairs were completed during fencing installation and a picture is attached.
  - D. Check if all debris in and around the facility has been picked up and properly disposed of.
    - a. Two types of debris were observed in the inspection. Figure 1 illustrates debris to the south of the STF. The STF was construction on a former landfill site and erosion is causing debris to protrude from the hillside. In addition, debris from the adjoining landfill has blow to the areas surrounding the KBL lease area. Would ENR please clarify if it is the intent that KBL remove landfill debris from outside the fenced KBL STF lease area?
    - b. The debris on the KBL lease area includes excess liner from the installation of the STF as shown in Figure 8. KBL has schedule debris removal for tomorrow morning, August 24<sup>th</sup>, 2022. A confirmation photo will be sent once completed.
  - E. Inquire with GLWB whether KBL Environmental Ltd. has submitted an application for water license renewal. KBL Environmental Ltd. cannot operate at this facility, or accept any new material until an active water license is in place.
    - a. An application has been submitted and KBL acknowledges that additional material cannot be received at this time. KBL continues to complete maintenance activities at the facility to manage the soil and water present.
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- 1. KBL Environmental Ltd is operating with an expired water license. The license expired June 24, 2022. KBL Environmental Ltd. must submit an application for license renewal as soon as possible and must not operate until an active license is in place.
    - a. An application has been submitted and KBL acknowledges that additional material cannot be received at this time. KBL continues to complete maintenance activities at the facility to manage the soil and water present.
  - 2. Analytical results for sampling of soil, water and snow must be to be sent to the inspector prior to acceptance at the facility to confirm water license criteria is met as per license condition Part E, Item 15. The inspector has not received any analytical results for materials currently in the facility to date.

- a. Acknowledged. Please note that soil and water currently at the facility was submitted to the inspector prior to acceptance. Soil and water at the Facility originated from two sources:
  - i. NTPC Aklavik Remediation. Mr. Lloyd Gruben is the inspector assigned to this spill. A Remediation Action Plan was prepared and submitted to Mr. Gruben on May 28, 2021 outlining the sampling results and intent to bring soil and water to the KBL Soil Treatment Facility. Mr. Gruben oversaw the remediation activities and was kept up to date on the remediation at the site, including transportation of materials to the KBL facility, in March and April 2022.
  - ii. NTPC Inuvik 2022 Spill. Mr. Bradley Voudrach is the inspector assigned to this spill. KBL met with the inspector on several occasions at the spill site and provided Mr. Voudrach with Remediation Action Plans on May 11, 2022 outlining the sampling results and intent to bring soil and water to the KBL Soil Treatment Facility. In addition, analytical was sent to inspector, Mr. Lloyd Gruben on May 12, 2022. In preparation for the Facility inspection copies were requested by Mr. Gruben and resent on 7-20-2022.
3. Debris was noted laying all over the facility rather than collecting and disposing of it at the Solid Waste Disposal Facility. As per license condition Part E, Item 11 this debris needs to be cleaned up and properly disposed of.
  - a. The debris on the KBL lease area includes excess liner from the installation of the STF as shown in Figure 8. KBL has schedule debris removal for tomorrow morning, August 24<sup>th</sup>, 2022. A confirmation photo will be sent once completed.
4. During the inspection it was noted that windrows exceed maximum height. Guidance on proper operation of Petroleum Hydrocarbon Contaminated Soil Treatment Facilities can be found in the Guideline for Petroleum Hydrocarbon Contaminated Soil Treatment Facilities in the Northwest Territories.
  - a. KBL measured the windrow on May 4, 2022 during maintenance activities at the site and confirmed that the permitted 4m was not exceeded. Since the completion of the inspection, the windrow was separated into two separate windrows on August 12, 2022 and it has been confirmed that the new windrows do not exceed the 4m height requirement.

Thank you;

Thank you | Merci | Mársı | Kinanāskomitin | Hqj' | Quana | Qujannamiik | Quyanainni | Máhsı | Máhsı | Mahsi



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**From:** Lloyd Gruben <Lloyd\_Gruben@gov.nt.ca>

**Sent:** August 19, 2022 3:38 PM

**To:** AlecSandra Macdonald (AMacdonald@glwb.com) <AMacdonald@glwb.com>; Leonard DeBastien (L.Debastien@glwb.com) <L.Debastien@glwb.com>

**Cc:** Wendy Bidwell <Wendy\_Bidwell@gov.nt.ca>; Norman Snowshoe <Norman\_Snowshoe@gov.nt.ca>; Katie Oliver <koliver@kblenv.com>; Renee White <rwhite@kblenv.com>

**Subject:** Water Licence Inspection Report\_KBL Environmental Ltd\_ G17L1 -002, July 28, 2022

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Good Afternoon,

Please find attached a copy of the July 28, 2022 Inspection Report for KBL Environmental Ltd's Soil Treatment Facility water licence. The original hardcopy will be mailed out to you. If you have any questions or concerns with regard to the attached report, please don't hesitate to contact me.

Lloyd Gruben

Water Resource Officer

Inuvik Region

Department of Environment and Natural Resources

Government of Northwest Territories

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