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Department of Environment

Ministère de l'Environnement

September 12, 2006

Richard Dwyer
Licensing Trainee
Nunavut Water Board

via Email to: licensingtrainee@nwb.nunavut.ca

SUBJECT: NANISIVIK PROPOSED LICENSE AMMENDMENTS

Dear Richard:

Pursuant with our responsibilities under the Nunavut's *Environmental Protection Act*, the Department of Environment (DOE) has reviewed CanZinco's proposed amendments to water license NWB1NAN0802 and has the following comments.

Amendment to monitoring of outflow from West Twin Disposal Area (Station 159-4), June 7, 2006 letter.

CanZinco has requested a change in the monitoring of Station 159-4 from daily to weekly. In July 2004, the NWB approved the Final Reclamation and Closure Plan (FRCP) submitted by CanZinco. This plan stipulates that during the reclamation period, monitoring of discharge point 159-4 would be undertaken daily; and during the closure period (years 1-2) monitoring will be undertaken weekly. The FRCP describes the two periods as follows.

*‘The **Reclamation Period** encompasses the period of active physical reclamation of the mine site and the completion of the major activities proposed in the Mine Closure Plan..... The rigorous schedule will satisfy the need for rapid feedback of environmental information to the reclamation managers. This will be an important means of managing the reclamation activities and ensuring appropriate protection of the environment is maintained’.*

*'The **Closure Period** immediately follows the Reclamation Period. During the Closure Period, only relatively minor maintenance work is planned at the mine site and monitoring will be focused on providing information for assessing the performance of the reclamation measures.'*

Based on the letter from CanZinco of June 7, 2006 which states that 'we were also able to complete the majority of the surface covers throughout the property',

and our knowledge of reclamation activities at the site, DOE does not consider that all the major activities required for reclamation have been completed and therefore the site cannot yet be considered in the closure phase. These remaining reclamation activities could serve to alter water quality and as such DOE does not believe that monitoring requirements should be reduced until these have been completed.

Amendment to SNP monitoring, June 16, 2006

In their June 16 letter CanZinco requested an amendment to their license to allow quarterly monitoring of SNP sites. It is unclear how this requested amendment relates to the June 7 request discussed above, where weekly monitoring at Station 159-4 was suggested.

The FRCP stipulates that Closure Period Monitoring at SNP sites be reduced to biweekly in years 3-5 and beyond this time a performance review will be undertaken to determine longer –term monitoring.

The purpose of this monitoring is to assess the overall performance of reclamation activities to ensure that they do not negatively impact the aquatic environment. To this end, the water quality data provided by CanZinco is encouraging but if the suggested amendment were approved, quarterly monitoring would essentially result in only one sampling occasion per year due to climatic conditions. DOE does not believe this frequency of monitoring to be sufficient so early in the process of reclamation and closure and recommends that the suggested amendment be rejected.

DOE thanks NWB for the opportunity to comment on these proposed amendments

Yours sincerely,

Original signed by

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