



August 10, 2003

Dionne Filiatrault, P. Eng
Senior Technical Advisor
Nunavut Water Board
E-mail: srtech@nwb.nunavut.ca

Re: Proposed Underground disposal of Mill Complex Decontamination Water.
NWB1NAN0208 – Part 5 item 'v'.

Dear Ms Filiatrault:

In response to your August 6, 2003 request for assistance in the review of the above-cited proposal, Nunavut Tunngavik Inc. is providing the following comments and recommendations.

The proposed activity comes from the earlier proposal for the summer 2003 reclamation activity, for which NTI has provided recommendations.

With respect to the specific activity of transport and storage of Mill Complex Decontamination Water underground, we would provide the following observations and recommendations.

- 1) The level of detail on the actual transport of the waters is scant and more details should be provided. Of particular concern is the lack of description of the measures that will be put in place to ensure that the waters are safely transported to the underground storage. In addition, description of the specific spill contingency program for this activity, have not been included. Considering that these waters will have high residual metal content, it is important to ensure that none of these waters enter the environment. We would recommend that the proponent provide some detail of contingency plans, addressing the actions to be taken in case of accidental spills or discharge, during transport.
- 2) As to the selected storage area, information is required to demonstrate that the waters deposited in the "lower shale zone" will remain in this containment area in the future, particularly once the additional material, from the balance of the reclamation process are deposited and stored underground.

With these issues effectively addressed, the proposed disposal and containment of the Mill Complex Decontamination Waters should be acceptable.

NTI thanks the NWB for the opportunity participate in the review of this proposal.

Respectfully Submitted

Stefan Lopatka,
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Lands & Resources Department, NUNAVUT TUNNGAVIK INC.