



P.O. Box 119  
GJOA HAVEN, NU X0B 1J0  
TEL: (867) 360-6338  
FAX: (867) 360-6369

ᓄᓇᓂᓪ ᐃᓚᓕᓚᓪᓃᓪ ᑲᑎᓚᓪᓂᓪ  
NUNAVUT WATER BOARD  
NUNAVUT IMALIRIYIN KATIMAYINGI  
OFFICE DES EAUX DU NUNAVUT

---

File: 1AR-POL0311

September 1, 2009

Bruce Donald  
Environment and Corporate Affairs  
Teck Resources Limited  
Bag 2000  
Kimberley, BC  
V1A 3E1

By Email: [Bruce.Donald@teck.com](mailto:Bruce.Donald@teck.com)

**Subject: Reconciliation of Administrative Requirements of Type “A” Water Licence  
1AR-POL0311**

---

Dear Mr. Donald,

In follow-up to the recently issued security amount modification of August 27, 2009 for Teck Resources Ltd. (Teck) Water Licence No. 1AR-POL0311, the Nunavut Water Board (NWB) would like to address a number of administrative issues that have been identified during the review of the Licence, submissions and historical files. These may require the attention of Teck in the form of clarification, re-submission (not on file) or a new submission to satisfy requirements of the Licence.

The following summarizes the areas of deficiency with respect to submissions required of the Licence and their significance with respect to Licence compliance. Also provided, is a summary of items related to monitoring and potential impacts to consider during a request for reduction in monitoring.

***Items requiring Teck provide additional information submission***

1. B-3: The 2004 quarterly reports are not on file with the NWB. TCL has provided a summary of the 2004 quarterly reports in the 2004 annual report. This issue was raised in the February 28, 2005 letter of direction.
2. B-6(iii): A translated executive summary for the 2006 annual report is not on file.
3. F-1: Design drawings (for construction) stamped by an Engineer are not on file for the Reclamation Landfill Cover Design. These drawings were required for Board approval. This issue was raised in the June 2, 2004 letter of direction.

4. H-6: The 2004 geotechnical inspection report is not on file. TCL has indicated that although an inspection was conducted, the report is not available. This issue was raised in INAC's July 26, 2006 inspection as well as the February 28, 2005 letter of direction.
5. H-27(iv): Identification of whether composite or grab sample collection methods were used for each effluent sample as required by Part H items 7-9 are not on file for 2003 and 2004.
6. H-27(vi): Mass loading monitoring results for cadmium and mercury in accordance with Part H item 23 are not on file. This could be as a result of absent monitoring information for H-27(ii)
7. H-27(vii): In 2007, acute lethality was observed in *Daphnia Magna*. Clarification is required regarding subsequent effluent characterization monitoring requirements in accordance with Part H item 14(i).

***Items recently distributed by the NWB for review***

8. 2008 4<sup>th</sup> Quarter and the 2008 Annual Report have been distributed for public review and comments along with the review by NWB technical staff will be forwarded to Teck prior to November 1 for consideration in the 2009 Annual Report submission.

***Items to be considered for an amendment request to monitoring requirements***

9. B-6(viii)(c)(i): Water quality monitoring results at exposure and reference areas in Garrow Bay for 2004, 2006, 2007, and 2008 are not on file.
10. B-6(viii)(c)(i): Sub-lethal monitoring results for 2007 and 2008 are not on file.
11. B-6(viii)(c)(iii): Clarification regarding the data on which the selection of the Final Discharge Point was made in compliance with Part H Item 35 is not on file.
12. B-6(viii)(c)(iii): Sub-lethal monitoring results for 2007 and 2008 are not on file.
13. B-6(viii)(c)(v): Methodologies used to conduct Effluent characterization and water quality monitoring and the related method detection limits for 2003 and 2004 are not on file.
14. B-6(viii)(c)(vi): Description of quality assurance and quality control measures for 2007 and 2008 are not on file.
15. G-4: A Board approved Comprehensive Assessment of Mine Site Remediation is not on file. TCL's June 14, 2005 document submitted to address this Licence condition does not address all the sub-item requirements of this Licence condition. [Note: All G-4 items to be addressed during amendment for reduced water quality monitoring]

***Indian and Northern Affairs Canada (INAC)***

16. B-6(vii): INAC's inspection report for the inspection conducted on September 9, 2004 is not on file with the NWB.

As you are aware, the Polaris Mine reclamation file is quite substantial and has required a great deal of effort on the part of the NWB and other agencies to review and provide assistance, confirmation and direction on the file and to Teck Resources Ltd. Although the above has been provided to Teck, there may be other additional items that become apparent to the NWB through further review that will require Teck's involvement in either clarification or submissions. The

NWB requests that Teck provide the information, where available, by **October 16, 2009** for review and consideration of any additional requests the NWB may have prior to November 1<sup>st</sup> for inclusion in the 2009 Annual Report.

By copy of this letter, the NWB requests that INAC provide the NWB with information pertaining to bullet item number 16, with reference to the Inspection Report for 2004, which is absent from the NWB public record.

If you have any questions or require clarification on the above, please contact the undersigned at (780) 443-4406, [dts@nunavutwaterboard.org](mailto:dts@nunavutwaterboard.org), or Richard Dwyer, Licensing Administrator at (867) 360-6338, [licensingadmin@nunavutwaterboard.org](mailto:licensingadmin@nunavutwaterboard.org).

Yours truly,

*Original signed by:*

David Hohnstein, C.E.T.  
Director Technical Services

Cc: Polaris Distribution List