



Environment
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June 2, 2003

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Our file: 4705 037 POLA

Via Facsimile

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RE: Polaris Mine Reclamation and Closure Plan – Meltwater Control Procedures

On behalf of Environment Canada (EC), I have reviewed the information submitted by TeckCominco Ltd. in response to the Nunavut Water Board's and EC's concerns regarding the meltwater control procedures for Polaris Mine. The following response has been provided pursuant to Environment Canada's mandated responsibilities for the enforcement of the *Canadian Environmental Protection Act*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

Environment Canada would like to thank TeckCominco Ltd. for their thorough reply to the concerns raised in our April 11, 2003 letter to the NWB. TeckCominco's reply addresses the majority of EC's concerns. However, EC still has outstanding concerns with the following issues:

- § Environment Canada has requested that TeckCominco take one (1) sample and complete water chemistry testing of the meltwater to be disposed of underground. Environment Canada disagrees with TeckCominco's position that determining the water chemistry of the meltwater is unnecessary. According to the Meltwater Control Procedures, the proponent has indicated that "although free hydrocarbons are not expected, water will be picked up from soils impacted with hydrocarbons". Further, TeckCominco's reply to the NWB's concerns, Question 3, indicates that "the meltwater will have some minor sediment loading, including some mineral sulfides, even if silt-control textiles are utilized". Environment Canada requests that TeckCominco complete one (1) sampling and analysis of the water destined for underground disposal in order to establish a baseline to allow for the development of appropriate measures to deal with any accidents or malfunctions that may occur.
- § Given that the receiving chamber will be accessible during the course of the reclamation project, EC accepts TeckCominco's suggestion to provide approximations of remaining volumes in the chamber. However, EC requests that TeckCominco Ltd. keep weekly records of their approximate determinations of amount of volume remaining in the underground disposal chamber, and notify regulators if the volume remaining in the chamber reaches 15% or less, so contingency plans can be made.

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Environment Canada appreciates that the resolution of these issues is of utmost importance given the onset of warmer weather. As such, EC recommends that TeckCominco begin to implement the necessary procedures to control and treat the meltwater, and complete the one recommended water test and analysis of the meltwater destined for underground disposal at their earliest convenience. Environment Canada would also like to state that it does not view the alternate "in-pit disposal" option to be preferable, and recommends that TeckCominco continue with their plans for underground disposal. If there are any changes in the proposed project, EC should be notified, as further review may be necessary. Please do not hesitate to contact me with any questions or comments with regards to the foregoing at (867) 975-4639 or by email at colette.meloche@ec.gc.ca.

Yours truly,



Colette Meloche
Environmental Assessment Specialist

cc: (Mike Fournier, Northern Environmental Assessment Coordinator, Environment Canada, Yellowknife)
(Stephen Harbicht, Head, Assessment and Monitoring, Environment Canada, Yellowknife)