

NIRB No.: 07DN007 INAC No.: N2007X0006

March 7, 2007

Dele Morakinyo Project Manager, Contaminated Sites Program Indian and Northern Affairs Canada PO Box 2200, Iqaluit, Nunavut, X0A 0H0

Via email: morakinyod@inac-ainc.gc.ca

## Re: Requirement to Address Comments Received about Roberts Bay and Ida Bay Site Remediation Project Proposal

Dear Mr. Morakinyo:

On February 5, 2007, the Nunavut Impact Review Board (NIRB or Board) received Indian and Northern Affairs (INAC) Roberts Bay and Ida Bay Silver Mine Remediation Project Proposal (Remediation Project) from the Land Administration at INAC.

As you are aware, NIRB invited interested Parties and municipalities most affected by the Remediation project proposal to comment directly to NIRB by March 2, 2007.

By March 5, 2007, NIRB received comments from the following interested Parties:

- Environment Canada
- Department of Culture, Language, Elders and Youth
- The Government of Nunavut Department of Environment

All documents received pertaining to the comments on this project proposal can be obtained from NIRB's ftp site at:

http://ftp.nunavut.ca/nirb/NIRB\_SCREENINGS/ACTIVE\_SCREENINGS/07CN007-INAC\_Roberts\_Bay\_and\_Ida\_Bay/1-SCREENING/02-DISTRIBUTION/COMMENTS/

Concerns regarding the project proposal were expressed by all interested Parties.

The main concerns include:

- Confirmation required from proponent that contaminated soils exceeding provided guidelines will not be left on site
- Lack of information regarding the proposed monitoring program
- Lack of information regarding the remediation of roadways, such as scarification or re-vegetation
- Lack of information on how tailings are distributed in the tailings pond and on how non-hazardous waste will be placed in the tailings

- Potential impact to groundwater due to discharge of untreated mine water into the underground
- Clarification required for the preferred option of disposing of contaminated soils
- Lack of information in the Remedial Action Plan, such as concentrations of PCB concentrations in equipment found on site, and confirmation that the 2 m cap planned for the tailings pond takes into consideration the climate change predictions
- Lack of information on how TSS will be managed during excavation of waste rock from above the high tide mark
- Lack of information regarding the security of the hazardous material that will be left at Ida Bay barge landing site until shipment to Hay River
- Lack of project proposal information, such as discharge criteria for the sewage lagoon to be constructed at site
- Potential serious impacts to human and wildlife health through the inhalation of the burning of waste products
- Potential bioaccumulation of deposited air contaminants to the land and water from burning of waste products
- Lack of information in the Waste Management Plan, such as purchasing policies that focus on reduced packaging; use of proper incineration devices
- Potential impacts to common eiders, migratory birds and nesting season
- Potential impacts to wildlife
- Potential grizzly bear, wolverine, wolves and fox encounters resulting in injury or death to either animal or human(s)
- Lack of information in the Spill Contingency Plan

Due to these concerns, NIRB would like to provide the Proponent with an opportunity to address all the comments before proceeding with the next steps of the screening process. NIRB requests that a response to be provided to both NIRB and the interested Parties by March 12, 2007. After this date, NIRB may continue with its Part 4 screening process.

All responses should be directed to NIRB's Manager of Environmental Administration, Leslie Payette at lpayette@nirb.nunavut.ca.

If you have any questions or concerns, feel free to contact me at 867-983-4606 or sgranchinho@nirb.nunavut.ca.

Sincerely,

Sophia Granchinho Technical Advisor

Cc Roberts Bay and Ida Bay Distribution List Jeffrey Holwell: Lands Administrator – INAC (holwellj@inac.gc.ca) John G Craig: Assistant Land Administrator – INAC (craigig@inac-ainc.gc.ca)