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Nunavut Regional Office
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February 09, 2009

Attn: Mr. Thomas Kabloona, A/Chief Executive Officer
Nunavut Water Board
P.O. Box 119
Gjoa Haven, Nunavut
X0B 1J0

RE: Nunavut Water Board (NWB) Licence No. 1BR-ROB0813 (NWB's Required Submissions)

As per the table of required submissions on page iii of the Roberts Bay/ Ida Bay's NWB Licence # 1BR-ROB0813, please find the following documents enclosed:

1. NWB's Table of Required Submissions (with INAC's responses);
2. Modifications to final Remedial Action Plan (RAP) – highlighting some modifications made to the project since the submission of the final RAP to NWB. The modifications were effected in the Project Specifications;
3. Roberts and Ida Bay Project Specifications;
4. General Monitoring Plan (as per Part K of the Water Licence # 1BR-ROB0813);
5. Long Term Monitoring plan;
6. Abandonment and Restoration Plan;
7. Operations and Maintenance Plan for Sewage Disposal Facility;
8. Site Specific Health and Safety Plan; and
9. Tailings Freezeback Report.

Should you have any questions or require any clarifications, please contact the undersigned or the Project Manager, Dele Morakinyo at dele.morakinyo@inac-ainc.gc.ca, or by telephone at (819) 934-9224

Sincerely,

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ROBERTS BAY AND IDA BAY LONG TERM MONITORING PLAN

February 09, 2009



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1.0 Introduction

Roberts Bay and Ida Bay are abandoned silver mine sites. Explorations for silver at Roberts Bay and for silver and gold at Ida Bay were carried out at the sites between 1965 and 1972. Mining activities took place at the sites from 1972 to 1975. Further explorations continued at the leases throughout the 1980s and 1990s. In 1997 the Roberts Mining Lease was surrendered and the area covered by the lease was opened and subsequently re-staked as the ORO 5 claim in 1998.

INAC has completed the site assessment of the site, developed a Remediation Action Plan (RAP), tendered and awarded contract for the RAP implementation and will be carrying out the remediation of the site between 2008 and 2010. The remediation will involve the demolition and disposal of buildings, structures and other debris; the clean up of hazardous materials; and the excavation and disposal of metals and petroleum hydrocarbon contaminated soils.

1.1 Location

Roberts Bay and Ida Bay sites are located approximately 115 kilometres southwest of Cambridge Bay on the north coast of mainland Nunavut. The Roberts Bay site is located approximately 1 km north of Roberts Lake while the Ida Bay mine site is located adjacent to Melville Sound about 6 km north of the Roberts Bay site (Figure 1).

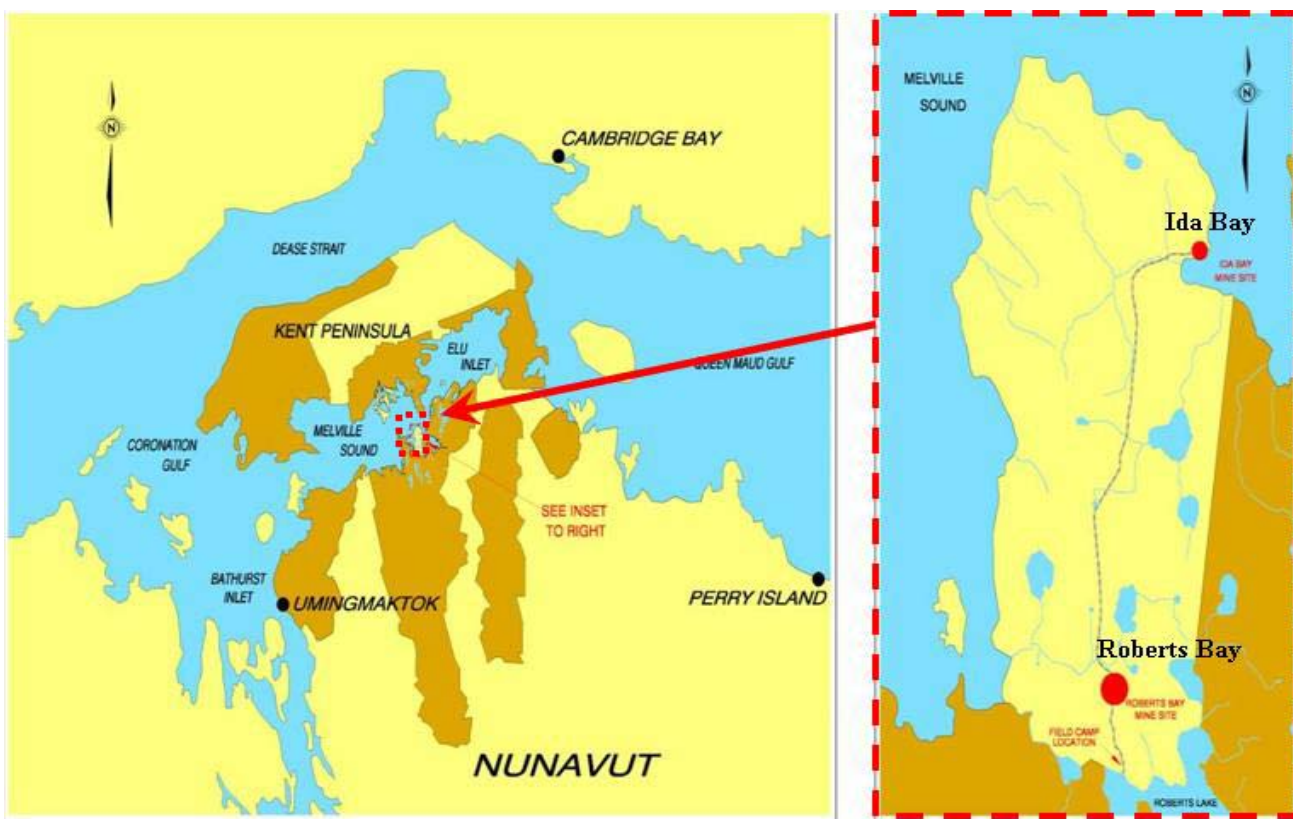


Figure 1: Roberts Bay and Ida Bay Location



1.2 Site Characteristics

1.2.1 Roberts Bay Site

The Roberts Bay mine site has been in a state of abandonment for nearly 30 years. It currently contains residual infrastructure; tailings pond; waste rock; abandoned equipment; non-hazardous wastes and debris (e.g. scrap metal, wood, mill equipment, appliances and burlap bags); hazardous wastes (e.g. petroleum products, batteries, propane tanks, assay lab reagents and some unknown chemicals); petroleum and metals impacted soil.

The site also contains two mine openings (1 adit and 1 vertical shaft) and a capped vent raise. The adit is surrounded by a chain-link fence meant to prevent accidental access to it, but has deteriorated over time. The adit is fully flooded. The vertical shaft is located on the side of a basaltic ridge and is accessible by climbing the ridge. The shaft is open and the walls look partially caved in. There is a fence surrounding 2/3 of the perimeter of the shaft, allowing access to the shaft opening. There are stability problems surrounding the collar. The vent raise has been capped with concrete.

Geochemical assessment conducted on the waste rock and the tailings at the site suggested that these materials are potentially non-acid generating.

1.2.2 Ida Bay Site

Similar to Roberts Bay, Ida Bay mine site has been in a state of abandonment for nearly 30 years. The site consists of one adit; a partially covered vent raise; three waste rock piles; three exploration trenches; and a small amount of non-hazardous debris (scrap wood and metal). The adit is in poor condition and fully flooded. There is no physical barrier to the adit's entrance with the exception of the water preventing access. The vent raise is covered with plywood and, it is flooded. The three exploration trenches found on the site are open.

Waste rock piles are located adjacent to the adit. The smallest of the three piles is located immediately north of the adit and extends from land into the ocean. The second pile is located west of the adit while the third large elongated pile is located to the west of the second pile. Geochemical assessments conducted at the site suggested that the waste rocks are potentially non-acid generating.



1.3 Climate

No weather station was available at Roberts/Ida Bay. The closest weather station is the Cambridge Bay Airport station, operated by Environment Canada, which is about 115 Km Northeast of Roberts Bay. At this station, the average annual total precipitation is 138.8 mm, consisting of 69.6 mm rainfall and 821 mm snowfall. The mean daily high temperature for July is 12.3°C and low of 4.6°C. The January mean daily high temperature is -29.3°C and low of -36.3°C. The fluctuation between highs and lows for daily temperature averages 7.0°C.

Local climate data, in association with the near-by Doris North Project, has been collected at the Windy Lake and Boston mineral exploration camps since 1993. The project area has a low Arctic ecoclimate with a mean annual temperature of -12.1°C with winter (October to May) and summer (June to September) mean daily temperature ranges of -50°C to +11°C and -14°C to +30°C, respectively. The mean annual total precipitation ranges from 94 mm to 207.3 mm. Annual lake evaporation (typically occurring between June and September) is estimated to be 220 mm.

1.4 Geology

The Roberts Bay/Ida Bay project area (the project area) is coastal lowland with numerous lakes and ponds separated by glacial landforms and parallel running geological intrusions of diabase dykes and sills. The drainage basins are generally long and narrow and predominantly oriented along the north-south axis. Low lying areas at the site are saturated and marshy and underlain by clayey silt with permafrost detected at depths of 0.3 to 0.6 m. The dominant soils are Turbic and Static Cyrosols. Elevated areas are typically underlain by a silty gravelly sand till, saturated if poorly drained with permafrost at approximately 0.6 m below grade. Occasional granular deposits are found in the vicinity of the site at surface and are typically well graded sands and gravels with 1 to 2% silt/clay.

The project area is found within the Hope Bay Volcanic Belt in the north of the Slave geological province; a geological sub-province of the Canadian Shield. The rocks within the region are primarily Archean in age and within the Yellowknife Supergroup. The region is underlain by the late Archean Hope Bay Greenstone Belt. This geological formation ranges from 7 to 20 km in width and over 80 km in length, orientated in a north-south direction. The late Archean Hope Bay Greenstone Belt lies entirely within the faulted Bathurst Block forming the northeast portion of the Slave Structural Province. The rocks in this belt are dominantly mafic to felsic lavas and tuffs, namely basalts and andesites that have undergone metamorphism to greenschist facies. Inclusions of granite, granodiorite and quartz veins are common throughout the volcanic belt. Along the margins, at the contact of the volcanics with granite, there are both structural and metamorphic deformations. Both the Roberts Bay and Ida Bay silver mineralization are found within vein structures. The structures of the deposits are generally controlled along a fault, and economic ore minerals included silver, copper, lead and zinc.



2.0 Monitoring Program

After the completion of remediation at the Roberts Bay and Ida Bay sites the only structure that will be constructed and remain at the site is the Non-Hazardous Waste Landfill (NHWL) at the Roberts Bay Site. No NHWL is required at the Ida Bay site. The non-hazardous wastes/debris from Ida Bay will be co-managed with the non-hazardous wastes from Roberts Bay at the Roberts Bay site's NHWL. Due to the small amounts of metals and PCB contaminated (TIER II) soils at the site, there will not be any need for a Secure Soil Disposal Facility (SSDF).

2.1 Details of the Non-Hazardous Waste Landfill

The NHWL is expected to be constructed at Roberts Bay in July 2009 and will be completed and closed before leaving the site in September/October 2009. The proposed location of the NHWL is the current tailings pond (Appendix B).

The NHWL will be constructed by first stabilizing the existing four perimeter tailings pond berms. Tailings spilled over existing berms will be consolidated and managed in the pond. Standing water (if any) in the tailings pond will be drained, treated (if required) and discharged off appropriately. A woven geotextile will be laid on the tailings followed by about 0.3 metre thick granular material for stabilization of the surface. The non-hazardous waste will be placed in the landfill in layers consisting of 0.5 metre lifts of waste covered by 0.15 metres of granular fill. Once all the layers were completed a final cover of granular fill will be used to cap the landfill.

The final construction steps include grading to promote drainage and the installation of the thermistors to monitor freeback. No monitoring wells will be installed as the zone is a permafrost zone and the wells will not likely produce any additional information.

The NHWL at Roberts Bay will contain: non-hazardous demolition debris, such as timbers, plywood, and sheet metals; non-hazardous site debris, such as scrap metal and wood; non-hazardous debris/soil excavated from site dumps; creosote timbers; and asbestos (double-bagged).

2.2 Monitoring Requirements

The monitoring procedures adopted for the Roberts Bay and Ida Bay sites will be similar to those defined in the INAC's Abandoned Military Site Remediation Protocol, AMSRP (2008), with some modifications as applicable to mine sites. The protocol recommends three categories of monitoring: pre-construction baseline monitoring and post-construction monitoring. Natural environment monitoring is also recommended for each visit to site for the post-construction landfill monitoring.



2.2.1 Baseline Monitoring

The baseline monitoring procedure recommended by INAC AMSRP (2008) involves soil monitoring and groundwater monitoring. Groundwater monitoring will not be required at this site as the zone is a permafrost region and the well may not yield any water.

- Soil Monitoring:

INAC AMSRP (2008) specifies that, for baseline monitoring, soil samples will be taken at a grid spacing of 50 m x 50 m. For the Roberts Bay Site, a minimum of four samples will be taken around the perimeter of the proposed landfill taking into consideration, the site topography. The GPS of these locations will be provided to the regulators following the commencement of work at the site.

The samples will be analyzed for:

- Inorganic elements: arsenic, cadmium, chromium, cobalt, copper, lead, nickel, and zinc;
- Polychlorinated biphenyls (PCBs); and
- Hydrocarbon Fractions, F1, F2, F3 and F4.

These data will supplement the soil information collected during the assessment phase of the site and will be used as the baseline soil data to which subsequent monitoring data would be compared.

- Water (Runoff) Monitoring:

Water samples will be collected (following spring melt) from the channel running towards the Roberts Lake and other channels surrounding the Landfill area that could hold water during spring melt. This will include ROB-6 to ROB-11 monitoring requirements specified in the Nunavut Water Board (NWB)'s Water Licence for this project.

Water samples will be analyzed for:

- Petroleum Hydrocarbon Fractions, F1 and F2
- Total and dissolved metals.
- Major ions, hardness, total dissolved solids, total suspended solids.
- pH and conductivity.
- PCBs



These data will supplement the surface water information collected during the assessment phase of the site and will be used as the baseline surface water data to which subsequent monitoring data would be compared.

2.2.2 Post Construction (Landfill) Monitoring

The INAC AMSRP (2008) recommends a landfill monitoring procedure which involves visual monitoring; soil monitoring and groundwater monitoring. Thermal monitoring is only required if the landfill being monitored is either a Tier II facility or a leachate containing landfill.

Since the Roberts Bay site is a mine site (not military) and because the Landfill is being built on top of the tailings, a modification to INAC AMSRP (2008) is being suggested whereby thermal monitoring will be used to monitor the permafrost aggradation in the landfill to ensure that the tailings and other content of the landfill are immobilized. Also, no groundwater monitoring will be required because the zone is a permafrost zone and groundwater wells will not likely produce any additional information. Similar to the baseline monitoring, surface water samples will be collected, during flow, from the channels surrounding the landfill.

The landfill monitoring program that will be conducted at Roberts Bay are:

- Visual Monitoring
 - This will check the physical integrity of the NHL and look for evidence of erosion, ponding, frost action, settlement and lateral movement (Appendix D contains a Visual Monitoring Checklist).
 - Photographs will be taken to document the condition of the NHL and substantiate the recorded observations.
- Soil Monitoring

Soil samples will be taken at the toe of the Landfill towards the down gradient and along the channel that runs towards the Roberts Lake. These samples will be analysed and the results will be compared to baseline/background samples. The parameters that will be analysed include:

- Inorganic elements: arsenic, cadmium, chromium, cobalt, copper, lead, nickel, and zinc
- Polychlorinated biphenyls (PCBs)
- Total Petroleum Hydrocarbons (TPH)



- Water Monitoring (at the surface channels surrounding the proposed Landfill location:

Water samples will be collected (following spring melt) from the channel running towards the Roberts Lake and other streams surrounding the Landfill area. This will include ROB-6 to ROB-11 monitoring requirements specified in the Water Licence for this project. These samples will be analysed and the results will be compared to baseline/background samples.

Water samples will be analyzed for:

- Petroleum Hydrocarbon Fractions, F1 and F2
 - Total and dissolved metals.
 - Major ions, hardness, total dissolved solids, total suspended solids.
 - pH and conductivity.
 - PCBs
- Thermal Monitoring
 - Four (4) thermistor strings (in pairs) with beads will be installed at selected intervals to provide ground temperature profiles at various locations within the landfill. The actual location of the thermistors to be provided when the contractor get to the site. Automatic data loggers attached to the thermistors allow remote data collection. The data from this system will be collected and analysed to confirm permafrost re-establishment after capping of the landfill.

2.2.3 Natural Environment Monitoring

The natural environment will be assessed immediately after site remediation. Both site specific and regional information will be collected. For full details of the site specific data and regional data that are required, reference can be made to the INAC AMSRP (2008). For the Roberts Bay site, the natural environment monitoring data that will be collected have been incorporated into Appendix D – the Visual Monitoring Checklist.

The natural environment monitoring will be conducted at the same time as other monitoring activities.



2.3 Monitoring Frequency

The post construction monitoring frequency will follow the schedule recommended in the INAC AMSRP (2008). The three phases recommended by the protocol are:

- Phase I: years 1, 3 and 5.
- Phase II (*if required*): Years 7, 10, 15 and 25
- Phase III: beyond 25 years

The monitoring program will be stopped if after the phase I (5 years post remediation) the evaluation of the program confirms that thermal equilibrium has been reached and there are no stability issues. Otherwise, monitoring continues to phase II. (i.e. up to 25 years post remediation). Another evaluation will be conducted at the end of 25 years to determine if monitoring should end or go to phase III. If required, the phase III monitoring requirements will be decided on at that stage.

Monitoring at the Roberts Bay and Ida Bay will begin in 2011. Phase I monitoring will take place in years 2011, 2013, and 2015. Each of the four monitoring events discussed above (i.e. visual monitoring, soil monitoring, water (runoff) monitoring and natural environment monitoring) will be conducted during each of the three site visits. The visits will be carried out during the months of June to August. An evaluation of Phase I monitoring data would be carried out at the end of the 2015 program to confirm whether or not additional monitoring is required.

If additional monitoring (phase II) is required, it will be carried out during the years 2017, 2020, 2025 and 2035. At the completion of the 25 year monitoring program a review will take place and the need for continued monitoring (phase III) will be assessed.

Table 3, below, outlines the monitoring schedule.



Table #1: Monitoring Schedule

Year	Site Monitoring Scheduled (X)
2011	X
2012	
2013	X
2014	
2015	X
2016	
2017	X
2018	
2019	
2020	X
2021	
2022	
2023	
2024	
2025	X
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2035	X

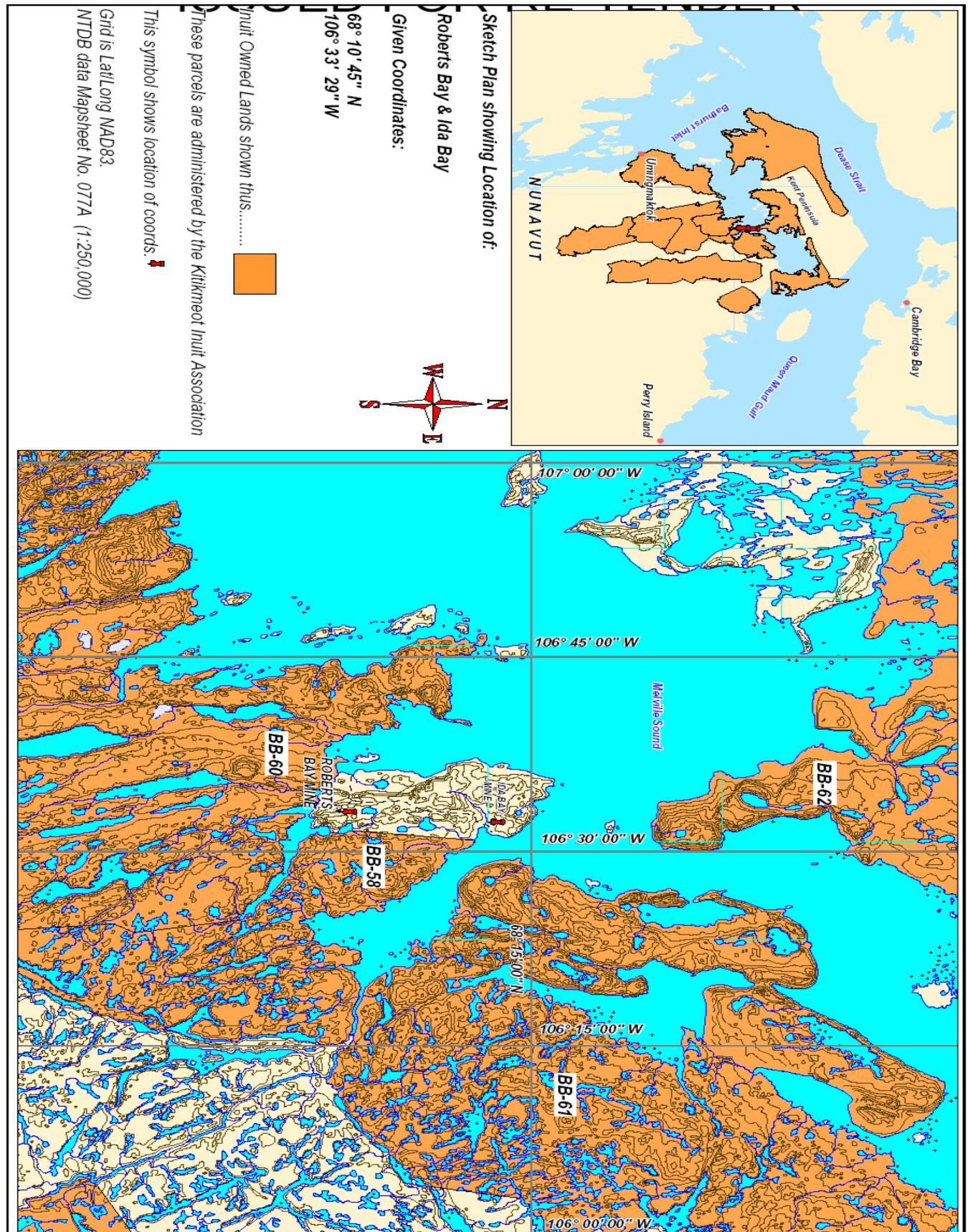
3.0 Quality Assurance/Quality Control

All sampling, sample preservation and analyses will be conducted in accordance with methods prescribed in the current edition of “Standard Methods for the Examination of Water and Wastewater”. All analysis will be performed in a Canadian Association of Environmental Analytical Laboratories (CAEAL) Accredited Laboratory.

Quality Assurance/Quality Control (QA/QC) will be consistent with CAEAL regulations and guidelines. At least 20% of samples will be taken and analyzed in duplicate and all appropriate QA/QC data will be generated and reported.

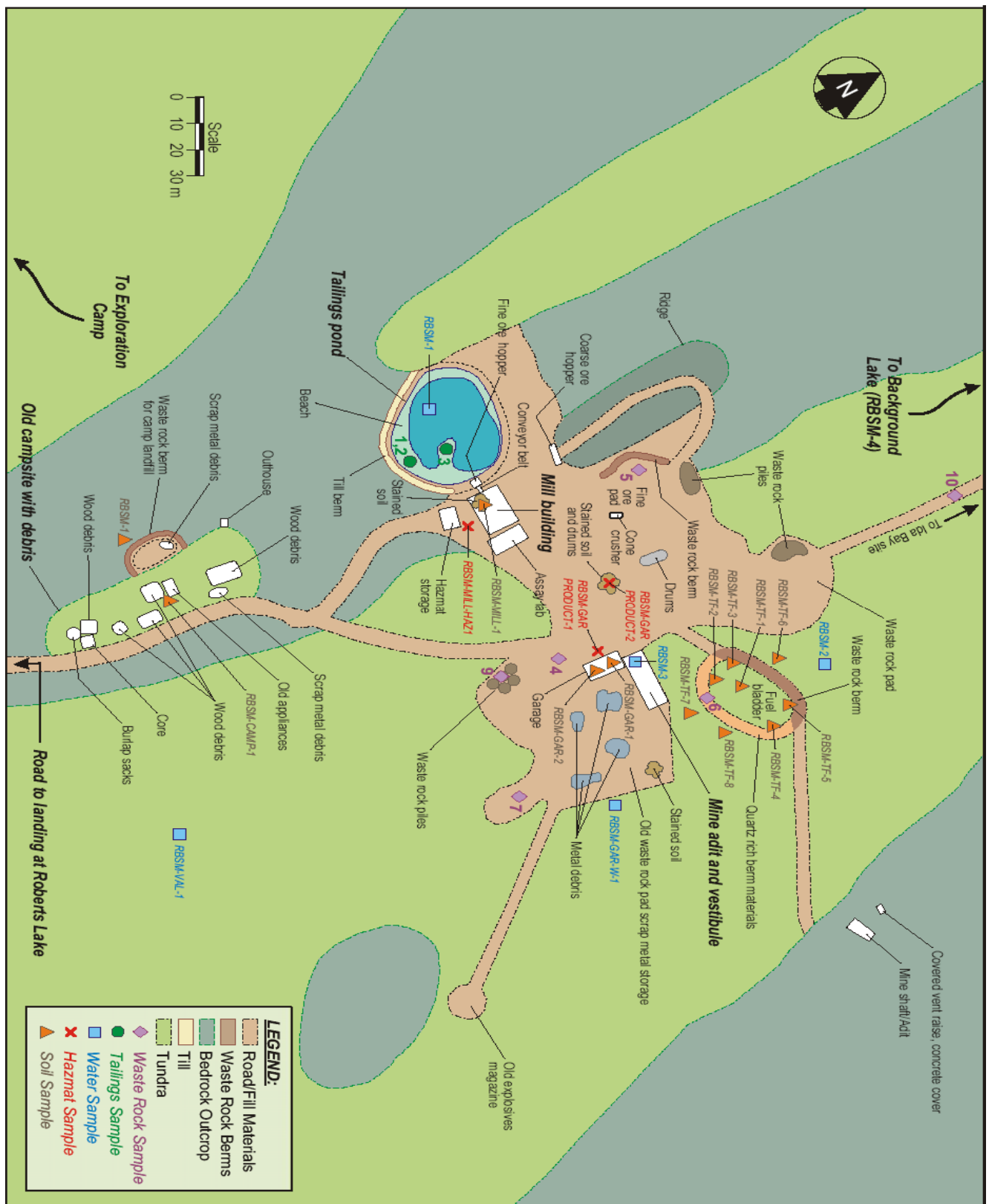


Appendix A: Roberts Bay and Ida Bay Map



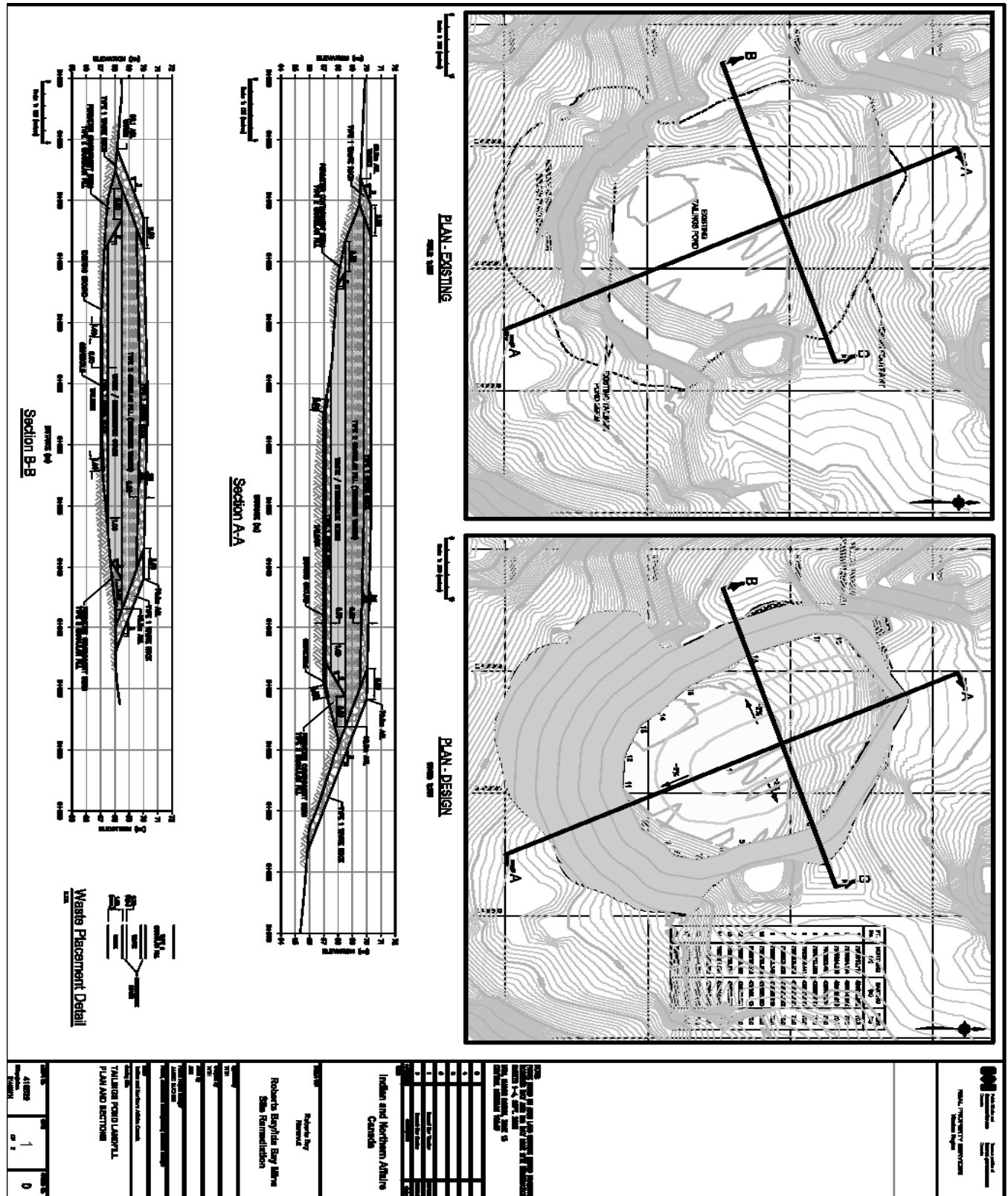


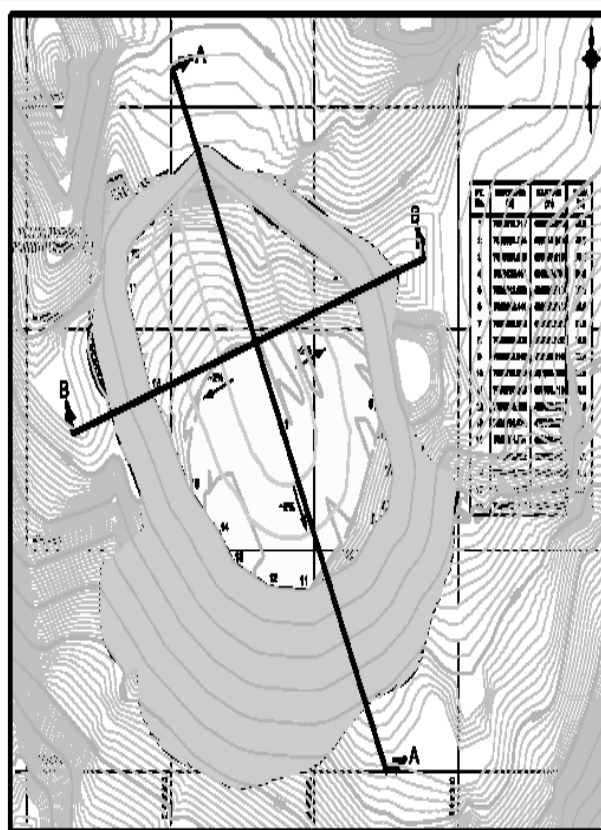
Appendix B: Non-Hazardous Waste Landfill Location Map (Tailings Pond Area)





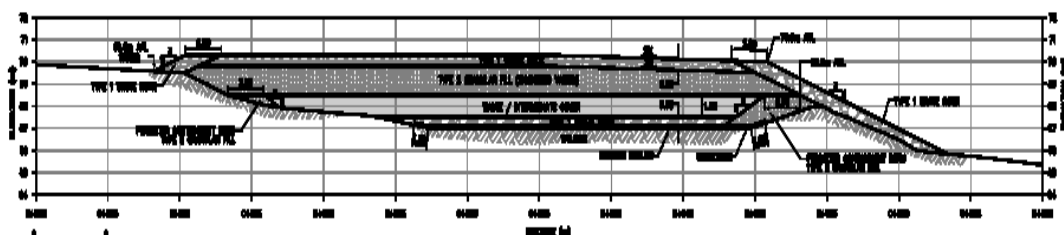
Appendix C: Non-Hazardous Waste Landfill As-Built Drawings



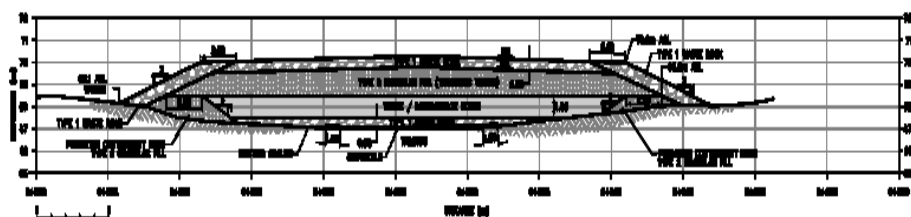


PLAN - DESIGN

Figure 1



Section C-C



Section D-D

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Indian and Northern Affairs Canada

Keywords:

**Roberta Hayflem May Mirm
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TALMAGE FORD LANDFILL

PERFORMANCE INDICATORS

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Appendix D: Visual Monitoring / Natural Monitoring Checklist



Roberts Bay and Ida Bay VISUAL MONITORING CHECKLIST

Date:	
Landfill:	
<i>Visually assess the landfill for the following items & provide a photograph record</i>	
1. Erosion	Answer
a) Is erosion occurring on the surface or berms of the landfill?	
i) Are there preferred drainage channels?	
ii) Is there sloughing of material?	
b) What is the extent of the erosion? <i>(percentage of surface area)</i>	
i) Is it localized or continuous?	
c) Where is the erosion occurring? <i>(i.e. along the toe, on the surface, through the berms)</i>	
d) Explanation: <i>(i.e. evidence of significant surface water run-off, poor material)</i>	
2. Settlement	Answer
a) Is there differential settlement occurring on the surface?	
i) Are there low areas or depressions?	
ii) Are voids forming?	
b) What is the extent of the settlement? <i>(percentage of surface area)</i>	
i) Is it localized or continuous?	
ii) How deep is it?	
c) Where is the settlement occurring? <i>(i.e. near berms, near the centre of the facility)</i>	
d) Explanation: <i>(i.e. evidence of significant surface infiltration, water ponding, snow drifting)</i>	
3. Frost Action	Answer
a) Is there frost action/damage to the landfill?	
i) Is there exposed debris due to uplift?	
ii) Is there tension cracking along the berms?	
iii) Is there sorting of granular fill?	
b) What is the extent of the frost action? <i>(percentage of surface area)</i>	
i) Is it localized or continuous?	
c) Where is the heaving/cracking occurring? <i>(i.e. along the toe, on the surface, through the berms)</i>	
d) Explanation: <i>(i.e. poor material, poor compaction, high water/silt content in cover material)</i>	



4. Monitoring Instruments

a) What is the condition of the monitoring wells and thermistor strings(*if applicable*)?

5. Others - Confirm presence or absence, extent and description of the following

Animal Burrows:

Vegetation:

Staining:

Vegetation Stress:

Seepage Points:

Exposed Debris:

Other observed features:



6. Sketch

7. General Comments

ROBERTS BAY / IDA BAY REMEDIATION PROJECT MONITORING PLAN (INCLUDING THE LONG TERM MONITORING)

GPS coordinates of all sampling points as well as a detailed schematic map identifying all monitoring station sites in relation to infrastructure and topography

- *The GPS coordinates are currently unavailable. They will be obtained by the contractor at the commencement of the 2009-10 field season and will be made available to Nunavut Water Board (NWB).*

The specific components of the visual, soil/water and thermal monitoring program, the sampling frequency, and the physical and chemical parameters for analyses:

- *Identified in the Comments/Plan column below or in the Long Term Monitoring Plan*

Monitoring	Station Description	Parameters	Frequency of Monitoring	Comments/Plan
ROB-1*	Water supply intake at un-named pond adjacent to the camp	Volume	Daily	The daily volume intake will be recorded by the contractor when remediation starts.
ROB-2*	Water supply intake at Robert's Lake	Volume	Daily	The daily volume intake will be recorded by the contractor when remediation starts.
ROB-3	Sewage pumped to the Sewage Disposal Facility	Volume	Monthly and Annually during remediation	An amendment to the original sewage management plan is the use of the NOMADIC™ Sewage Wastewater System. Sewage influent volumes will be recorded based on the outlet volumes. The Normadic unit has a volume measurement device at the outlet. An inlet device could be fitted to the system if required.
ROB-4	Final Point of Discharge from the Sewage Lagoon	Volume and Water Quality	Once upon commencement	An amendment to the original sewage management plan is the use of the NOMADIC™ Sewage

			of discharge and once prior to completion of discharge during remediation	Wastewater System. Sewage effluent volumes will be recorded at the outlet of the treatment unit. The Normadic unit has a volume measurement device at the outlet. Samples will be collected and tested to confirm compliance with treatment criteria specified in Part D (Page 18) of the Roberts Bay Water Licence (1BR-ROB0813).
ROB-5	Discharge from the Tailings Pond	Volume and Water Quality	During periods of flow	An amendment to the AMEC Remediation Plan is that the Tailings Water will not be disposed of in the Adit. Section 01 11 00 summary of Work of the Project Specifications identifies that the Tailings Pond will be dewatered and sampled to determine the disposal option. The new plan is to pump out the water and treat it if necessary prior to discharge on land. If the water cannot be treated, it will be disposed of off site.
ROB-6	The stream flowing south to Roberts Lake (main watershed)	Water quality	Annually after spring melt	Water sample at a location in the stream (GPS to be provided) will be taken and analysed to meet the Canadian Council of Ministers of the Environment (CCME) Canada Water Quality Guidelines (CWQG) for the protection of aquatic life
ROB-7	The stream or streams flowing north and west around the bedrock high (northern site drainage)	Water quality	Annually after spring melt	Water sample (s) at a location (s) in the stream (s) (GPS to be provided) will be taken and analysed to meet the Canadian Council of Ministers of the Environment (CCME) Canada Water Quality Guidelines (CWQG) for the protection of aquatic life
ROB-8	Any streams flowing west to Roberts Bay located below the Tailings Pond, Solid Waste Disposal Facility, and Landfill sites (to detect possible leachate from those facilities)	Water quality	Annually after spring melt	Water sample (s) at a location (s) in the stream (s) (GPS to be provided) will be taken and analysed to meet the Canadian Council of Ministers of the Environment (CCME) Canada Water Quality Guidelines (CWQG) for the protection of aquatic life
ROB-9	Roberts Lake (for background and color)	Water quality	Annually after spring melt	Water Samples will be taken from Roberts Lake. The samples will be analysed to meet the Canadian

				Council of Ministers of the Environment (CCME) Canada Water Quality Guidelines (CWQG) for the protection of aquatic life
ROB-10**	Runoff and Leachate from the Solid Waste Disposal Facility/Tailings Pond	Water quality	Annually after spring melt	Long Term Monitoring Plan attached
ROB-11**	Runoff and Leachate from the Landfill	Water quality	Annually after spring melt	Note:- same as ROB-10 Long Term Monitoring Plan attached
ROB-12	Tailings	Temperature	As determined by re- evaluation of need for post closure monitoring	Long Term Monitoring Plan attached

* Based on the outcome of the analysis of the water samples taken from ROB-1 and ROB-2, either of these two will eventually be used as the water supply source during the remediation project.

** ROB-10 and ROB-11 are the same.