Environmental Protection Operations Directorate Prairie and Northern Region (PNR) 5019 52nd Street, 4th Floor P.O. Box 2310 Yellowknife NT X1A 2P7

June 28, 2013

EC file: 4105 006 390 NWB file: 1BR-ROS1116

Phyllis Beaulieu, Manager of Licensing Nunavut Water Board P.O. Box 119 Gjoa Haven NU X0B 1J0

Via e-mail: licensing@nunavutwaterboard.org

Attention: Ms. Beaulieu

RE: 1BR-ROS1116 Long-Term Monitoring Plan - Kitikmeot

Environment Canada (EC) has reviewed the above-mentioned request submitted to the Nunavut Water Board (NWB). The following specialist advice is provided pursuant to the Canadian Environmental Protection Act 1999, the pollution prevention provisions of the Fisheries Act, the Migratory Birds Convention Act, and the Species at Risk Act.

Aboriginal Affairs & Northern Development Canada (AANDC) submitted the PIN-D ROSS POINT Long-Term Monitoring Plan to the NWB on April 22, 2013 as a requirement of Part K, Item 1 of water licence 1BR-ROS1116. The purpose of this plan, as stated in the lincence, is to provide information on the long-term monitoring of waste disposal facilitates at the site and address water quality monitoring, stability, and the need of thermal monitoring and groundwater monitoring.

Based on a review of the Plan, EC provides the following comments for the NWB's consideration:

- EC recommends that the Proponent provide a list of the total and dissolved metals to be analyses as part of the water quality monitoring.
- Section 2.3 discusses the monitoring schedule and identifies that monitoring will become less frequent over time, however it does not address what criteria are being used to determine when to sampling frequency will be decreased. EC recommends that monitoring frequency is reduced only when and if supported by the monitoring results, as opposed to being predetermined.
- Part of the purpose of the Plan, as stipulated in the water licence, was to address stability and the need of thermal monitoring and groundwater monitoring, however these factors do not appear to form part of the Plan as presented. EC recommends that the Plan be expanded to address these parameters.



Should you require further information, please do not hesitate to contact me at 867-669-4746 or jane.fitzgerald@ec.gc.ca.

Sincerely,

Jane Fitzgerald

Environmental Assessment Coordinator

cc: Yongshu Fan, Senior Environmental Assessment Coordinator, Environmental Assessment and Marine Programs-PNR, EC

