ECCC #4 Follow-up Comment Received July 30, 2024

Subject/Topic	Tank Security Features
References	• Section 2A: Description of the Facilities and/or Works to be Constructed, Application for MLA Tank Farm Modification (Phase 3: Addition of Tank 5), B2Gold Nunavut, May 28, 2024 • Section 2D: Description of Any Monitoring Required, Including Sampling Locations, Parameters Measured, and Frequencies of Sampling, Application for MLA Tank Farm Modification (Phase 3: Addition of Tank 5), B2Gold Nunavut, May 28, 2024 • B2Gold Nunavut's Comment Responses for the MLA Tank Farm Modification (Phase 3: Addition of Tank 5), July 15, 2024
Comment	The Proponent's response expands on the monitoring practices that ensure the tanks are performing as designed, but does not provide further details on the full scope of safety features that will be equipped with the new tank, including corrosion protection, overfill protection, leak detection, or other measures that would reduce the risks of accidents and malfunctions.
Recommendation/ Request	ECCC recommends that the Proponent provide detailed information in the Tank Farm Modification Application document, on the safety features of the proposed new fuel tank. This should encompass all safety features like corrosion protection, overfill protection, leak detection, and other relevant measures to minimize the risks of tank failure.

B2Gold Nunavut Response	The tank farm has the following safety features to reduce the risk:
	• Tank settlement monitoring program.
	• Daily tank and line inspections will be completed to help detect leaks as quickly as possible.
	• Design is completed to API-650.
	• Overfill protection
	  ○ An internal overflow line acts as a final line of defense to drain into the containment berm if the tank is overfilled.
	  ○ A high-high level sensor will be used as a redundant system and will trigger the motorized valves to close in the event of an overfill.
	  ○ Each storage tank will be equipped with an overfill alarm system to notify the operator, automatically stop the pumping operation and close all fill valves. Valve position will be monitored by the central control system and interlocks will allow only one tank to be filled at a time. Level sensors will also be monitored by the central control system and will work with associated interlocks to prevent any tank from overfilling.
	  ○ Will follow procedures as outlined in API-2350 when filling tanks.
	• Even though the secondary containment has been enlarged to 67,000 m3, the additional tank is only 18,600 m^3 of operating capacity
	• A foam chamber fire suppression system will be in place to prevent fires within the tanks.