



NIRB File No.: 05MN047

December 2, 2010

Doris North Project Distribution List

Sent Via Email

Re: Comments Request regarding HBML's 2010 Q1&Q2 Air Quality Report

Dear Parties,

On November 23, 2010 the Nunavut Impact Review Board (NIRB) received Hope Bay Mining Ltd.'s (HBML) *2010 Q1&Q2 Air Quality Report* for the Doris North Gold Mine Project (the Project). This semi-annual report is a requirement of Condition 30 of the NIRB Project Certificate (No. 003), issued on September 15, 2006 which states:

Air Quality:

30. MHBL will install and fund an atmospheric monitoring station. This station and its location shall be developed in consultation with EC and HC air quality officials and focus on particulates of concern generated at the mine site. The results of air-quality monitoring are to be reported every six (6) months to NIRB through the Monitoring Officer, and from there to all of the parties.

Commentary: NIRB expects the Canada Wide Standards for Dioxins and Furans and the Canada Wide Standards for Mercury will apply and should be followed including stack testing of incinerators.

This report can be accessed from NIRB's ftp site at:

<http://ftp.nirb.ca/03-MONITORING/05MN047-DORIS%20NORTH%20GOLD%20MINE/02-MONITORING%20AND%20MANAGEMENT%20PLANS/AIR%20QUALITY%20PLAN/04-SEMI%20ANNUL%20REPORT/2010/>.

A document entitled *B3 Air Quality Assessment Methods.pdf* contained in the Final Environment Impact Statement (FEIS) submission during review process for the Project can be accessed from the NIRB's ftp site at:

http://ftp.nirb.ca/02-REVIEWS/COMPLETED%20REVIEWS/05MN047-DORIS%20NORTH%20GOLD%20MINE%202006/2-REVIEW/09-FINAL_EIS/103.%20FEIS/Supporting%20Documents/A3%20-%20B3/

The NIRB has completed a preliminary review of HBML's 2010 Q1&Q2 Air Quality Report and finds that it generally meets the requirements of the Condition 30. However, the NIRB notes the following items which will require attention and/or further clarification in future report by HBML:

1. The measured concentrations of Total Suspended Particulates (TSP) are lower than that of combined concentrations of PM_{2.5} and PM₁₀, and it is noted that a leak test and flow audit was being performed to identify the causes. The NIRB requests that the audit results and associated measures for improvement be included in the forthcoming Q3 and Q4 air quality report.
2. Dust fall and ambient air quality monitoring were performed within the Hope Bay Belt, including at Doris North, over the first six months of 2010. While the NIRB expects that the monitoring of sites outside of Doris North will provide useful baseline data in support of potential future development along the Hope Bay belt, the Board recommends that reporting for the purpose of compliance with the Doris North Project Certificate be limited to results in the scope of the Doris North Project.
3. Ambient air quality, in terms of average concentrations of SO₂, NO₂ and O₃, was monitored by using a Passive Sampling method at the Doris North and Boston sites on a monthly basis. The monitoring results (monthly average) could not be compared with, nor evaluated directly by, the associated thresholds included in the referenced guidelines. The NIRB expects HBML to incorporate the respective data collected from Q1 and Q2 into the report for Q3 and Q4, making a direct comparison of this data against the annual criteria in the adopted guidelines and the predicted values contained in the FEIS for the Project (*Doris Project Air Quality Assessment Methods*, September 2005). Any inconsistencies between assessment, predictions and monitoring methods and reporting should also be addressed.
4. It is indicated in the report that the results from Q3 and Q4 would be included in the 2010 annual report. The NIRB reminds HBML that the Doris North Project Certificate requires the results of air quality monitoring to be reported every 6 months. The inclusion of a summary of air quality as part of HBML's Annual Report, as indicated in Appendix D of the Project Certificate does not exempt HBML from the requirement to report full air quality monitoring results on a semi-annual basis.
5. A comparative analysis should have been included within the report in order to assess the accuracy of the air quality predictions contained in the FEIS. HBML should include a comparative analysis of this information in its next report as well as further information regarding the data averaging period and reference criteria between impact assessments, predicted values in the FEIS and current monitoring results.

As required by Project Certificate No. 003, the NIRB hereby distributes the report to parties, and requests that parties with jurisdictional authority and/or expertise with air quality review the report and provide comments directly to the NIRB by **December 23, 2010**. Following the receipt of comments, the NIRB will provide further direction to HBML as necessary.

Please forward all forthcoming submissions to the attention of the NIRB at info@nirb.ca or via fax to (867)-983-2594.

If you have any questions or require additional clarification, please contact the undersigned at (867) 983-4606 or liwan@nirb.ca.

Sincerely,



Li Wan
Technical Advisor
Monitoring Officer for the Doris North Gold Mine Project
Nunavut Impact Review Board

cc: Chris Hanks, HBML (Chris.Hanks@Newmont.com)
Paula Smith, Environment Canada (paula.c.smith@ec.gc.ca)
Kelly Senkiw, Health Canada (Kelly_Senkiw@hc-sc.gc.ca)