



Environmental Protection Operations Directorate (EPOD)
Prairie and Northern Region (PNR)
P.O. Box 1870
Iqaluit NU X0A 0H0

July 31st, 2015

EC file: 6100000010/024
NWB File No.: 2AM-DOH1323

Phyllis Beaulieu
Manager of Licencing
Nunavut Water Board
PO Box 119
Iqaluit NU, X0B 1J0

Via Online Submission

**RE: Water Licence 2AM-DOH1323
 TMAC Resources Inc., Waste Rock and Ore Management Plan
 Responses to Party Comments (EC)**

Attention: Ms. Beaulieu

Environment Canada (EC) has reviewed TMAC Resources Inc.'s (the Proponent) response letter dated July 20th 2015 submitted to the Nunavut Water Board (NWB) concerning the *Request to Modify the Waste Rock and Ore Management Plan* under Water Licence 2AM-DOH1323 and is providing feedback as requested by NWB. EC has a number of outstanding concerns which are outlined as follows:

EC2: Issue # 2 ML/ARD Potential, Geochemical Characterization

In reference to Section 2.5.1 Table 2: *Geochemical Classification and Management Recommendations for Proposed Waste Management Units related to diabase* classification, EC remains unclear as to why the samples under the TIC/AP method that are classified as "uncertain or PAG" are being disregarded. EC is concerned that the Proponent's response makes reference to two diabase samples that do not adequately address the TIC/AP classification findings. Given the discrepancy between the classification results of the TIC/AP and that of the NP/AP, is the Proponent suggesting that TIC/AP results are invalid?

EC4: Issue #4 Period of Waste Rock Deposition and Backfilling, Annual Inspections and Review

The Proponent concludes that inspection frequency for monitoring waste rock seepage is suitable, however EC maintains that annual inspections are inadequate given conditions are not static with seasonal fluctuations to consider.

EC recommends that the Proponent carry out more frequent inspections which are necessary to detect changes that may occur.

EC5: Issue #5 Period of Waste Rock Deposition and Backfilling, Annual Inspections and Review

The Proponent's response does not provide an explanation as to what is considered as an "environmentally significant level of metal leaching" occurring from the waste rock material. EC recommends that the Proponent provide a clear and quantifiable definition of what is considered a "significant level".

For further clarification on any aspect of this submission, please contact Lisa Lowman at (204) 984-0668 or Lisa.Lowman@ec.gc.ca.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lisa Lowman', with a stylized, flowing script.

Lisa Lowman
Senior Environmental Assessment Coordinator

cc: Sarah-Lacey McMillan; A/Head, Environmental Assessment North (NT & NU),
PNR-EPOD
EC Internal Distribution