



P.O. Box 360
Kugluktuk, NU X0B 0E0
Telephone: (867) 982-3310
Fax: (867) 982-3311
www.kitia.ca

Kugluktuk
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Bathurst Inlet
Kingaok
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Cambridge Bay
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Kugaaruk
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September 8, 2011

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

Via Email: licensing@nunavutwaterboard.org

Re: 110825 2AM-DOH0713 Revised Interim Wtr Mgmt Plan

Dear M. Beaulieu,

The KIA has prepared comments in response to the letter prepared by HBML in their July 29th response letter to the Nunavut Water Board, which addressed comments submitted by KIA, INAC, and EC. The following comments are numbered according to the ID# used by HBML in their letter.

#2. HBML did not fully answer the question. We understand that the Interim WMP was written to describe how facilities will be operated before Tail Lake is in service. However, HBML should clarify if the present “as constructed” facilities need to be upgraded once the Interim period has passed, or if they are now sized for operations under the Final WMP.

#3 (General). The figures attached are not “Issued for Construction Drawings”. However, they do show the “As-Built” key trench for the liners in the Sedimentation Pond and the Pollution Control Pond. It is not clear from these drawings what the extent of the liner is in each Pond. If the liner is not being keyed into permafrost all the way around the perimeter, it is not clear how capture of all the runoff and seepage from the pads above the ponds is being accomplished. It would appear that some seepage could pass underneath the liners and not be tested or treated.

#3c. HBML should confirm then that all pad construction materials were sourced from quarries and not mine (development) waste rock. *Note that the NWB did not approve the use of mine waste rock for construction.*

#3d. Further to #3 above, it is not clear how a partially lined pond will capture all of the seepage and runoff from the pads, without having some volume pass under the liner. The volume that would pass under the liner would then go untested and untreated.

#4. This point ties in with KIA’s comment to #2 above. In the original licensing submission, Miramar based pond sizes on the 1:100 year event. HBML should clarify if, in their Final WMP, the 1:100 year event will be used to size structures. If so, do the structures need to be upgraded accordingly, or do the structures already have the capacity to handle 1:100 year events?



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#6. HBML should check their response. Table 1 of the Interim WMP indicates that Pad R reports to the Pollution Control Pond, not the Sedimentation Pond. However Figure 1 (un-numbered) shows Pad R reporting to the Sedimentation Pond. HBML should make all these references internally consistent.

#12. HBML has not specifically answered the question. Does the 2008 Hydrology Baseline Update include the July 2007 storm event in Kugluktuk?

With respect to the actual revised Interim WMP itself, the KIA has the following general comments:

- It is recommended that the responses addressing the intervener's comments also be incorporated into the interim plan, to create a stand-alone document rather than being left in two documents. This should include the next round of responses addressing this set of comments.
- The total area of the individual pad areas shown as "Clean Diversion" and "Potentially Contaminated" in Figure 1 (not numbered) does not agree with the 80,000 m² and 82,000 m², respectively, shown on the drawings. HBML should confirm what is being included, or verify the individual pad areas.

The KIA would like to thank the NWB and HBML for the opportunity to comment on this file. Please contact us if you have any questions.

Sincerely,

Luigi Torretti
Senior Environment Officer
Kitikmeot Inuit Association
Dep't of Lands & Environment