



Indigenous and
Northern Affairs Canada

Affaires autochtones
et du Nord Canada

Your file - Votre référence
2AM-DOH1323

January 9, 2018

Our file - Notre référence
IQALUIT-#1199556

Licensing Department
Nunavut Water Board
P.O. Box 119
GJOA HAVEN, NU, X0B 1J0

Sent via email: licensing@nwb-oen.ca

Re: Technical Review of TMAC's Aircraft De-icing management plan for Doris - TMAC resources

To Nunavut Water Board,

Thank you for the Nunavut Water Board's December 1, 2017 notice of the above mentioned management plan.

A memorandum is provided for the Nunavut Water Board's consideration. Comments and recommendations have been provided pursuant to Indigenous and Northern Affairs Canada's (INAC) mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

Please do not hesitate to contact me by telephone at 819 953 8988 or email at ian.parsons@aandc-aadnc.gc.ca for further information.

Sincerely,

Ian Parsons
Regional Coordinator
Water Resources Division
Indigenous and Northern Affairs Canada
P.O. Box 100
Iqaluit, NU X0A 0H0

Encl.

Cc. Erik Allain, Director of Lands, INAC, NRO
Eva Paul, Water Resources Officer, Field Operations, INAC, NRO

Canada

Memorandum

To: Licensing Department, Nunavut Water Board

Date: January 3, 2018

Re: Technical Review of TMAC's Aircraft De-icing management plan for Doris - TMAC resources

Applicant: TMAC Resources
Project: Doris Project
Region: Kitikmeot

Comments:

A. Background

TMAC has submitted an aircraft de-icing management plan covering the Hope Bay Belt. However, they are submitting it as a management plan under 2AM-DOH1323, as this plan, if approved will start with the aircraft operations at Doris.

B. Results of review

On behalf of INAC's Water Resources Division, the following comments and recommendations are provided for the NWB's consideration:

1. Contaminated snow and water from De-icing operations

Source:

- 1) 2AM-DOH1323---- De-icing Management Plan

Comment: TMAC has stated in their De-icing management plan under Section A2.3 Storage, Handling and Containment that "the water disposed of at the sump will be managed as per the existing Type A Water Licence. While INAC appreciates that TMAC has indicated that the water will be disposed of as per the existing Type A Water Licence INAC believes that TMAC should add a section in the management plan indicating to more fully describe how water used or affected by de-icing activities is to be managed, how often de-icing is to occur, what water quality criteria will be used to assess the level of potential contamination, and how affected water will be disposed. . This will avoid any confusion as to where to locate de-icing related water management and mitigations measure in the water license and distinguish these from existing mitigation measures.

Recommendation 1: INAC recommends that TMAC add a section to the De-icing

Management plan indicating the disposal method of the contaminated water and snow. The description should include when, where and how affected water will be managed and treated. As well, the Plan should include a list of water quality criteria that must be met before allowing for the disposal of the impacted water.