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February 27th, 2012

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Serving the
communities of

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Arctic Bay

Dionne Filiatrault
Executive Director
Nunavut Water Board
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Cape Dorset

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Clyde River

Ms. Filiatrault,

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Re: Baffinland Iron Mines Corporation's 2012 Work Plan Application

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The Qikiqtani Inuit Association (QIA) would like to thank the Nunavut Water Board (NWB) for providing the opportunity to present comments on Baffinland Iron Mines Corporation (BIMC) the New Type B Water Licence application.

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QIA submits to NWB this technical review of the application and seeks clarity from the NWB and BIMC on selected items. QIA will have a greater understanding of the regulatory administration and project activities, upon receipt and review of the requested information.

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- i. Select review comments relate to the use of engineering authorization on reports and drawings submitted to the NWB. QIA is aware of a meeting the NWB administered in Edmonton on July 21, 2011 that discussed this topic. BIMC's water licence application submission may be influenced by the discussions during the July 21, 2011 meeting, which are unknown to QIA. During the October, 2011 Technical Meeting in Iqaluit regarding BIMC's Draft Environmental Impact Statement, the NWB committed to "endeavor to provide the QIA information on the outcome of the meeting...in which issues related to Engineering Drawings and Standards for Water Licensing were discussed"¹. QIA has not received information from the NWB to date. **It is requested that meeting minutes and outcomes from the Edmonton July 21, 2011 meeting be provided to QIA for consideration in this water licence application review and provided on the public record.**
- ii. Index for Attachment 8 references a Waste Management Plan document. This document was not available within the water licence application package.

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¹ Commitment #265. November 4, 2011 BIMC letter to NIRB titled "Revised List of Commitments from Technical Meetings".



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Sanikiluaq

- ix. **Mine Site – Advance the waste rock characterization program** – There is limited information presented in the water licence application on the context of the waste rock characterization program. A reference to the discussion at the Iqaluit Technical Meetings is provided. This reference alone without additional details of the program with submission with the water licence application is insufficient to assess potential impacts, water use, and waste disposal. It is unclear if the waste rock characterization program will require on-site activities, or primarily off-site activities





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Qikiqtani Inuit Association

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non-hazardous inert waste. Clarification is requested if the sewage sludge would be an acceptable waste type to the solid waste facility.

- e. Sewage treatment effluent criteria that are suitable to the receiving environment are requested to be included as a water licence term and condition if the practice of sewage discharge to non-freshwater is the responsibility of the NWB.
- f. SNP monitoring and annual reporting of treated sewage effluent is requested as a water licence term and condition.
- g. A sewage treatment operations and maintenance plan is requested for review and approval by the NWB as a term in the water licence.

xii. **Steensby Site – Potable water treatment** – Drawing H337697-4610-05-030-0001 depicts two source lakes for drinking water (Lake ST347 and 3km Lake). The location of Lake ST347 is unknown; however the 2012 work plan states water will be obtained from 3km Lake. **Clarification is requested if Lake ST347 will be used as a water source, and if so, the location depicted on a map.**

xiii. **Steensby Site – Oily water treatment** – Collection of oily water from fuel dispensing and containment areas may occur. Treatment of this waste will likely be required prior to discharge. It is unclear if this activity is accounted for in the existing water licence (2BB-MRY1114) or required in the new water licence. **Clarification is requested on the discharge effluent criteria, discharge location, and monitoring requirements and reporting.** If this activity is scoped under the existing water licence, clarification is requested from the NWB if any water licence reporting and effluent treatment criteria are currently implemented; if not, why not.

QIA has provided various administrative and technical comments pertaining to the water licence application and project activities. It is understood that the Nunavut Impact Review Board (NIRB) is receiving comments from Interested Parties regarding this screening of this project. QIA may have additional comments to the NWB upon review of NIRB's decision.

Sincerely,

N Beveridge

Navarana Beveridge
Executive Director

cc – Ryan Barry, Executive Director, Nunavut Impact Review Board