

September 23, 2022

Omer Pasalic
Senior Inspector, CIRNAC
Nunavut District, Nunavut Region
P.O. Box 100
Iqaluit, NU X0A 0H0

Re: Water Licence 2AM-MRY1325 Baffinland Response to June 2022 Inspection

The following submission from Baffinland Iron Mines Corporation (Baffinland) is a follow up in response to the Water Licence Inspection¹ conducted on June 29th, 2022, at Baffinland's Mary River Project (the Project) by the Crown-Indigenous Relations Northern Affairs Canada (CIRNAC) Senior Inspector. The attached Table 1 provides a summary of the Inspector's key observations and concerns. Baffinland has detailed responses to these items in Table 1.

Should you have any additional concerns or questions regarding the attached responses, please do not hesitate to contact the undersigned at your convenience.

Regards,

A handwritten signature in black ink, appearing to read "Connor Devereaux".

Connor Devereaux
Environmental Manager

Cc: Karén Kharatyan, Assol Kubeisnova (NWB)
Omer Pasalic (CIRNAC)
Megan Lord-Hoyle, Lou Kamermans, Tim Sewell, Kendra Button, Todd Swenson, Francois Gaudreau, Martin Beausejour (Baffinland)

Attachments

Attachment 1 – Table 1: Baffinland Responses to CIRNAC 2022 June Inspection Report
Attachment 2 – Photos

¹ CIRNAC (2022) Re: 220803 2AM-MRY1325-June Inspection-IAAE Report - CIRNAC Baffinland Iron Mines Water Licence Inspection Form. Inspection form dated August 3, 2022.



Attachment 1

Baffinland Response to CIRNAC 2022 June Inspection Report

Table 1: Baffinland Responses to CIRNAC 2022 June Inspection Report

Cm t. #	Project Location	Description of Concern or Finding	Baffinland's Response
1	WRF WTP	Numerous construction items were observed outside the construction building that were not properly secured. As such, there was/is a risk present for debris to be blown out of the intended construction area during high winds causing negative impact on the surrounding environment.	The clean-up of the various waste and construction debris at the WRF WTP laydown has been completed. A photo is provided in Attachment 2.
2	WRF WTP	No copy of water license was observed at the facility. Ensure every facility contains posted and visible copy of the water license.	A copy of Baffinland's 2AM-MRY1325 Water Licence has been placed in the Waste Rock Facility Water Treatment Plant. A photo is provided in Attachment 2.
3	KM110.5 Laydown (Maintenance Shop)	Following the waste rock's facility site, laydown area was inspected. Inspector observed that no signage identifying the area as such was posted. The erected signage needs to be identified in all official languages of Nunavut.	Signage has been erected at the KM110.5 Maintenance Shop and Water Treatment Plant in both English and Inuktitut. A photo is provided in Attachment 2.
4	KM104 and KM104.5 Laydowns	MS-11 Laydown area (Km 104), was inspected. The inspector observed multiple knocked down signage along the road.	Signage has been erected at the KM104 Laydown in both English and Inuktitut. Signage has also been re-erected along the Mine Haul Road. Photos are provided in Attachment 2.
5	MSC and Sallivik WWTPs Incinerator Open Burn	The wastewater treatment plant (MSC), waste treatment plant (Tamativiik) site, incinerator site and open burn pit (KM 98) was inspected. No copies of the water license were present at all within these facilities were confirmed by the facilities operator at the time of the inspection. Ensure every facility contains posted and visible copy of the water license.	A copy of Baffinland's 2AM-MRY1325 Water Licence has been placed in these facilities. A photo is provided in Attachment 2.

Cm t. #	Project Location	Description of Concern or Finding	Baffinland's Response
6	Camp Lake Jetty	Camp's withdrawal water intake lake (Jetty) was inspected. The inspector noted no visible signs, erected or otherwise, identifying the area as such were present at or near the inspected location. The erected signage needs to be identified in all official languages of Nunavut.	Signage has been erected at the Camp Lake Water Jetty in both English and Inuktitut. A photo is provided in Attachment 2.
7	MS-03B Tank Farm	The fifteen million liters capacity fuel tank was inspected. Melting snow caused water to accumulate within the berms of the fuel tank. Inspector advised the site's environmental coordinator that the sampling of the accumulated water needs to be taken prior of discharge.	MS-03B Fuel Tank Farm was successfully discharged completely in July 2022. Results of this discharge were reported in the July 2022 Monthly Water Licence report. A photo of the post-discharge status of MS-03B is provided in Attachment 2.
8	KM101 Culvert	Damaged culvert identified in the previous inspection still not addressed. Ensure the damaged culvert has been properly addressed (on the road to the airport).	The culvert end will be repaired prior to Freshet 2023 during frozen conditions. The culvert is under a cable berm that is not driven over, and the culvert is currently not impeding water flow therefore there is low risk for any negative impact to the environment. A photo of the current status of the culvert is provided in Attachment 2.
9	Mine Haul Road	Knocked down signs along the roads. Ensure the signs along the roads are properly erected and visible.	Signage has been re-erected along the Mine Haul Road. A photo is provided in Attachment 2.



Attachment 2

Photos

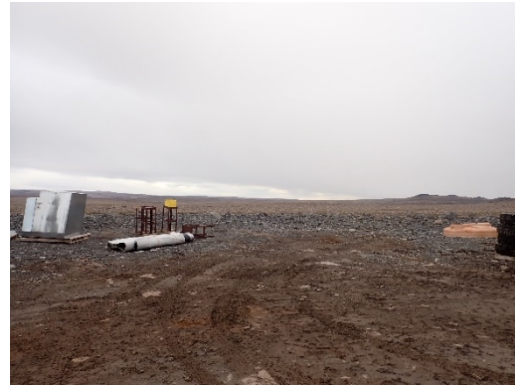


Figure 1. Photos of WRF WTP Laydown With Construction Debris Removed



Figure 2. Photo of Water Licence Posted in WRF WTP





Figure 3. Photos of Signage in English and Inuktitut at KM110 Laydown and KM110.5 Shop



Figure 4. Photo of Signage in English and Inuktitut at KM104 Laydown



Figure 5. Photos of Signage in English and Inuktitut & Copy of Water Licence at Camp Lake Water Jetty



Figure 6. Photos of Water Licence Posted in MSC WTP and WWTP



Figure 7. Photo of Water Licence Posted in Sailiivik WTP and WWTP



Figure 8. Photo of Water Licence Posted in Mine Site Incinerator Building



Figure 9. Photos of MS-03B Tank Farm in August After Discharge



Figure 10. Photo of KM101 Culvert under a Berm, Adjacent to Tote Road – August 25, 2022



Figure 11. Photo of Signage re-erected along the Mine Haul Road