



February 2<sup>nd</sup>, 2015

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**Re: Historical Ash Deliverables**  
**Mary River Project - Water Licence No. 2AM-MRY1325**

Dear Mr. Hack,

In the letter sent to AANDC on July 4, 2014, "*Follow-up to April and June 2014 Inspections*", Baffinland outlined its plan to dispose of historic ash from the incinerators (Section 4a). Part of this plan was to have the Category 1 ash that is stored in Milne Port Site transported to and disposed of in the Mary River Mine Site Landfill. This was originally scheduled to be completed by the end of 2014. Unfortunately, due to resource constraints and other limitations we were unable to completely meet that deadline. There are still approximately 180 barrels of ash remaining in the secondary containment berm awaiting final disposal in the Mine Site Landfill.

Further to this, a final summary of the disposal plan was to be submitted to you on or before January 31, 2015, however we are unable to provide the final summary report at this time as the disposal has not yet been entirely completed.

In consideration of the above, this letter is a formal request for an extension on the aforementioned schedules to include the disposal of the category 1 ash from the Port Site to be completed on or before July 31, 2015 and the final summary report to be submitted on or before September 30, 2015.

As well, this letter will provide a further update to the letter sent October 20, 2014, "Historic Waste Ash Sample and Disposal Update".

**Milne Port Site**

A temporary lined berm was constructed and currently contains 362 barrels that were inspected which yielded the following characteristics:

- 179 barrels waiting transportation and disposal in the Mine Site Non-Hazardous Landfill
- 71 barrels of re-burnable waste – being incinerated as backlog of waste is being completed
- 92 barrels of hazardous waste to be back-hauled during the 2015 sealift

**Mine Site**

Currently, 276 barrels remain stored in the lined containment berm at the Mine Site. Re-burnable barrels are being added to incinerator loads as available. TCLP residual analysis ensures this method of disposal adheres to regulatory requirements (GN, 2011).

The 2014 Sampling Program unassessed barrels will be reassessed in 2015. The EWS Incinerator, and conservative loading procedures will allow for incineration of selected barrels, while all assessed category 5 barrels will be back-hauled during the 2015 sealift.

**Soil Monitoring Program**

As stated in the July 4, 2014 "*Follow-up to April and June 2014 Inspections*" letter to AANDC, a soil sampling program is to be conducted on soils underlying the current ash storage areas to ensure there is no impact due to metals and other potential contaminants above applicable Nunavut/CCME guideline criteria upon decommissioning



of the storage areas. Records from this program will be available to inspectors upon request for review and a final summary of findings of this program and notification of completion of the Disposal Plan for the Waste Ash in Barrels will be submitted to AANDC Water Inspectors on or before September 30, 2015.

Should you require further information or clarification on the above noted spill, please feel free to contact Jim Millard at (902) 403-1337 or the undersigned at (647) 253-0596 x6010.

Sincerely,

A handwritten signature in black ink, appearing to read "Allan Knight".

Allan Knight, B.Sc.  
Environmental Superintendent

Attach: Table: 2014 Historical Ash in Barrel Disposal Program

cc. Michael Anderson, Erik Madsen, Jim Millard, Trevor Myers (Baffinland),  
Erik Allain (AANDC), Manager of Licencing (NWB).



## 2014 Historical Ash in Barrels Disposal Program

Category	Category Description	Status	Summer, 2014				2014 Back Haul	Fall, 2014	
1	Barrels fit for Landfill disposal.	730 Barrels disposed at the Mine Site landfill January, 2014.	Mine Site		Milne Port			Mine Site	Milne Port
			Remaining	Disposed	Remaining	Disposed		Remaining at site	
2	Barrels with unknown contents.	Contents of each barrel were confirmed in the summer/fall of 2014.	306	30	14	14		276	14
3	Barrels of ash generated since 2012 sampling program.	Barrels sampled in the summer/fall of 2014. - All barrels disposed at the Mine Site Landfill had known contents and tested below hazardous waste limits.	119	119	179	0			179
4	Barrels that contain food waste.	Barrels to be re-incinerated on an ongoing basis.	22	15	77				71
5	Barrels that contain hazardous materials or contained ash that tested above the hazardous waste limits.	Barrels to be backhauled to a licenced facility for proper disposal during the 2014 sealift.	4		92		8,450 kg (22 m <sup>3</sup> )		92
								276	356