Water Resources Division Resource Management Directorate Nunavut Regional Office P.O. Box 100 Igaluit, NU, X0A 0H0

> Your file - Votre référence 2AM-MRY1325 Our file - Notre référence CIDM#1244662

March 18, 2019

License Administrator Nunavut Water Board P.O. Box 119 Gjoa Haven, NU, X0B 1J0 E-mail: licensing@nwb-oen.ca

Re: Crown-Indigenous Relations and Northern Affairs Canada Review of Modification Request No. 11, 380 Person Camp Incinerator, by Baffinland Iron Mines Corporation for the Mary River Project, Water Licence No. 2AM-MRY1325 – Amendment No. 1.

Dear Ms. Porter,

Thank you for your March 4, 2019 invitation for Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) to comment on Baffinland Iron Mines Corporation (Baffinland) application to modify Water Licence No. 2AM-MRY1325 – Amendment No. 1, for an incinerator for the 380 person camp at Milne Inlet, approved under Modification No. 3b. CIRNAC examined the submission and comments have been provided pursuant to CIRNAC's mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

1. Engineering Drawings

References:

 Baffinland Iron Mines Corporation Application for Modification No. 11 to the Mary River Project, Water Licence 2AM-MRY1325, Incineration Unit for Milne Port 380 Person Camp, February 28, 2019.

The site plan provided in the application submission did not include sufficient foundation details to demonstrate how the incinerator is intended to be supported. Structural fasteners are required to warrant adequate stability and performance of the contemplated equipment. These details are not provided in the submitted engineering drawing. The site





plan and engineering drawing provided should be supplemented with an Issued for Construction (IFC) drawing which supplies these details.

Recommendation:

CIRNAC recommends that Baffinland submit an IFC drawing detailing how the incinerator will be foundationally supported and fastened.

If there are any questions or concerns surrounding the above comments, please contact me at (867) 975-4282 or bridget.campbell@canada.ca, or the Manager of Water Resources, Godwin Okonkwo, at (867) 975-4550 or email godwin.okonkwo@canada.ca.

Sincerely,

Bridget Campbell,

Water Resource Coordinator

CC: Christopher Murray, Baffinland Iron Mines Corporation

Assol Kubeisinova, Nunavut Water Board