



Water Resources Division  
Nunavut Regional Office  
Iqaluit, NU X0A 0H0

Our File: 9545-1652(N7L2) / CIDMS 151874

Your File: 2BB-BOS

June 5, 2007

Richard Dwyer  
Licensing Trainee  
Nunavut Water Board  
Gjoa Haven, NU X0B 1J0

**Re: 2BB-BOS / Miramar Hope Bay Ltd. / Boston Project / licence renewal application**

On behalf of Indian and Northern Affairs Canada (INAC) I have reviewed the above-mentioned application. The following specialist advice has been provided pursuant to INAC's mandated responsibilities for the enforcement of the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* (NW&NSRT), *Arctic Waters Pollution Prevention Act* (AWPPA), and the *Department of Indian Affairs and Northern Development Act* (DIAND Act).

Miramar Hope Bay Ltd. is applying for a five (5) year renewal of its Type B water licence for the Boston Project. The Boston Project is situated on Inuit Owned Lands in Nunavut's Kitikmeot Region, having a general coordinate of 67°39' north latitude and 106° 22' west longitude. Planned exploration activities will consist of prospecting, diamond drilling, core-splitting and logging, the operation of a bulk sample crushing and sorting plant, the operation of an accommodations facility (i.e., camp), the operation of a hydrocarbon contaminated soil landfarm facility, and the operation of an on-site solid waste landfill facility.

Indian and Northern Affairs Canada recommends that the following comments be considered when reviewing the submitted licence application:

1. General
  - a. The proponent should specify the accommodation capacity of its Boston Camp and its proximity to nearby Nunavut communities.
2. Emergency Response / Spill Contingency
  - a. Peter Kusugak, Manager of Field Operations, Indian and Northern Affairs Canada, Nunavut Region, should be included as an emergency contact in the project's Spill Contingency Plan. Peter is based in Iqaluit and his office telephone number is (867) 975-4295.

- b. The submitted Emergency Response and Contingency Plans document's contact list provided in Appendix C has an incorrect telephone number for the INAC Water Resources Officer. Please site Peter Kusugak, Manager of Field Operations as the INAC contact.
- c. The Spill Contingency Plan should include a 24-hour telephone contact number for the site superintendent and site supervisors responsible for managing spill-response procedures. This will ensure that employees who discover hazardous material spills can activate an appropriate response and provides a point of contact for the INAC Water Resources Officer.
- d. Applicable material safety data sheets should be include within the project's Spill Contingency Plan.
- e. A detailed schematic diagram of the project infrastructure, base topographic contour lines, and freshwater sources at a practical scale should be included in the project's Spill Contingency Plan. This diagram would promote a good understanding of the project and the impact that a hazardous material spill would have on the surrounding area.
- f. INAC recommends that all fuel products be stored within a secondary containment system positioned at least 30 metres away from the high water mark of nearby water bodies.

### 3. Hydrocarbon Contaminated Soil Landfarm Facility

- a. The proponent has not provided as built design drawings and documentation for the Boston Project's hydrocarbon contaminated soil landfarm facility. INAC recommends that the NWB consider whether such drawings and documentation be required for the project's licence renewal.
- b. An Operations and Maintenance Manual specific to the landfarm facility should be provided to the NWB for review. This manual should describe the qualitative and quantitative properties of soil considered to require treatment, landfarm facility management practices (i.e., aeration, humidity, and nutrient addition to contaminated soil), management of collected precipitation runoff, soil treatment standards, and soil and water monitoring procedures.
- c. The proponent should adhere to the remediation guidelines for soil specified in the Government of Nunavut's Environmental Guideline for Site Remediation.
- d. The proponent should follow the Canadian Council of Ministers of the Environment Guidelines for the Protection of Aquatic Life when setting a

discharge standard for precipitation runoff collected within the hydrocarbon contaminated soil landfarm facility.

- e. The NWB and INAC Field Operations should be notified in advance of any removal of treated soil or water from the hydrocarbon contaminated soil landfarm facility.

4. Non-hazardous Waste

- a. The submitted licence application form references a solid waste disposal landfill. The proponent should specify the design of this facility, what materials are placed within it, facility management procedures (i.e., compaction of wastes), and whether released effluent requires monitoring.

5. Reclamation Practices

- a. The proponent should include page numbers in its Boston Camp Closure and Reclamation Plan. Furthermore, this plan should be renamed and made applicable to the entire Boston Project, not just the camp.
- b. Reclamation procedures for the project's non-hazardous waste landfill should be included within the project's closure and reclamation plan.
- c. Section 9.11 of the Closure and Reclamation Plan addresses the land treatment area. The proponent does not specify what will happen to soils that do receive adequate treatment prior to the cessation of project activities. The management of contaminated soil at closure should be included in this plan.
- d. The proponent should submit final engineered design drawings, sealed by a professional engineer for the project's hydrocarbon contaminated soil landfarm facility. INAC requests that this documentation be provided

Indian and Northern Affairs Canada requests notification of any changes in the proposed project, as further review may be necessary. Please contact me should you have any questions or comments with regards to the foregoing. I can be reached by telephone at (867) 975-4555 or by email at [abernethyd@inac-ainc.gc.ca](mailto:abernethyd@inac-ainc.gc.ca).

Regards,  
**ORIGINAL SIGNED**

David W. Abernethy

Cc. Jim Rogers, Manager of Water Resources – Indian and Northern Affairs Canada,  
Nunavut Regional Office

