



Water Resources
Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence
2AM-DOH1323, 2BE-HOP1222, 2BB-BOS1217

June 9, 2016

Our file - Notre référence
CIDM#1071679

Ida Porter
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0A 1J0

Re: 2AM-DOH1323, 2BE-HOP1222, 2BB-BOS1217 – Review of Revised Spill Contingency Plan submitted by TMAC Resources Inc. – Hope Bay Project Sites

Dear Ms. Porter,

Thank you for your May 9, 2016 invitation for written representations on the above referenced monitoring plan.

The Water Resources Division of Indigenous and Northern Affairs Canada (INAC) has conducted a review of the Spill Contingency Plan submitted by TMAC Resources Inc. and the results of our review are presented in the attached memorandum for the Nunavut Water Board's consideration.

Comments have been provided pursuant to INAC's mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

INAC appreciates the opportunity to participate in this review. If there are any questions or concerns, please contact me at (867) 975-3876 or by e-mail at sarah.forte@aandc-aadnc.gc.ca.

Sincerely,

Sarah Forté
Water Management Coordinator

cc. Ian Parsons, Acting Manager, Water Resources Division, INAC
Erik Allain, Manager of Field Operations, INAC

Technical Review Memorandum

To: Ida Porter, Licensing Administrator, Nunavut Water Board

From: Amjad Tariq, Regulatory and Science Advisor, Water Resources Division, INAC
Sarah Forté, Water Management Coordinator, Water Resources Division, INAC

Date: June 9, 2016

Re: Review of Spill Contingency Plan for Type A Water Licence 2AM-DOH1323 and
Type B Water Licences 2BE-HOP1222 and 2BE-BOS1217

Applicant: TMAC Resources Inc.

Projects: Doris North, Hope Bay Regional Exploration and Boston Advanced
Exploration

Region: Kitikmeot

A. BACKGROUND

On May 9, 2016, the Nunavut Water Board (NWB or Board) provided notification of TMAC Resources Inc.'s (TMAC or the licensee) submission of a revised Spill Contingency Plan, dated April 2016.

This submission by TMAC is to fulfill requirements of Part I of water licence 2AM-DOH1323, Part H of water licence 2BE-HOP1222, and Part H of B water licence 2BE-BOS1217. The NWB invited comments on the first report, entitled *Spill Contingency Plan – Hope Bay, Nunavut*, dated April 2016.

The NWB requested interested parties review the revised plan and make representations by June 9, 2016.

B. RESULTS OF REVIEW

Indigenous and Northern Affairs Canada notes that spills of process water or mine dewatering water, as might occur from pipelines, are not discussed in the plan submitted. This is understandable given that operations have not yet progressed to a stage where these are present on site. We expect that appropriate modifications will be made to the plan before such a time.

On behalf of INAC Water Resources, the following comments and recommendations are provided for the Board's consideration:

1. Spills response resources

Reference:

- o Spill Contingency Plan - Hope Bay, Nunavut, prepared by TMAC Resources Inc., April 2016

Comment:

Appendix A of the Spill Contingency Plan provides details on spill kit contents and aquatic environment response equipment, but the information on mobile equipment (machinery) to be used for spill response is not available.

Recommendation:

INAC recommends that the licensee include the list of mobile equipment to be used for spill management, as well as the spill containment equipment on each piece of equipment.

2. Location of spill response kits

Reference:

- o Spill Contingency Plan - Hope Bay, Nunavut, TMAC Resources Inc., April 2016
- o Guidelines for Spill Contingency Planning, Indian and Northern Affairs Canada, April 2007

Comment:

Section 2.5.1 of the spill contingency plan states that spill response kits will be available within 200 m of any areas where chemicals are stored and used. Aquatic spill response kits are available in moveable containers.

The spill response kit locations are described as being easily accessible, but it is not clear if there will be adequate signage to identify them. As well, the modules at the end of the plan include pictures on which chemical storage locations are circled, but there is no indication where to find the spill kits beside them.

The Guidelines for Spill Contingency Planning recommend including a plan with many features including storage locations of hazardous materials and locations of spill response kits.

Recommendation:

INAC recommends that spill kit locations be identified on the ground and, on a site map or indicated in the pictures included in the plan. Default storage locations for the mobile

aquatic response spill kits should be included so that a person consulting the plan would quickly know where to look for them.

3. Spills of materials other than hydrocarbons

Reference:

- Spill Contingency Plan - Hope Bay, Nunavut, prepared by TMAC Resources Inc., April 2016

Comment:

The section on spill response actions (2.3) outlines actions to be taken in event of different spill scenarios. Two of the scenarios for spills in water outline actions to be taken in event of a hydrocarbon spill, but do not speak to what should be done if other materials are spilled. These are sub-sections 2.3.5, spills under ice, and mitigation of impacts to birds. Some of the materials listed as on site including sodium cyanide would not disperse in the same way as petroleum products and would require different action responses.

Recommendation:

INAC recommends that the licensee include action responses for materials that might sink or dissolve in water for spills under ice and mitigation of impacts to birds.

4. Relevant legislation and guidelines

Reference:

- Spill Contingency Plan - Hope Bay, Nunavut, prepared by TMAC Resources Inc., April 2016

Comment:

Table 1 of section 1.2 includes regulations and guidelines governing the spill contingency plan. Other regulations are referenced in the text and included in section 7 of the plan.

INAC suggests that other material to be considered might include:

- Federal *Transportation of Dangerous Goods Act* and regulations; and
- NWT *Used Oil and Waste Fuel Management Regulations*