

Water Resources Division
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référence
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Apr 26/02

Your file - Votre
NWB1BOS0106
Our file - Notre référence

April 25, 2002

Rita Becker
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, Nunavut
X0B 1J0

Dear Ms. Becker:

Re: Hope Bay Joint Venture - Spill Contingency

The Water Resources Division has reviewed the updated Spill Contingency Plan (the "Plan") submitted by Hope Bay Joint Venture (HBJV). In general, the Plan has been prepared in accordance with the Guidelines for Contingency Planning; however, there are a few areas that should be addressed with greater detail.

The contingency measures for acid rock drainage are very general and basically state that any such waste would be disposed of in an approved location. This statement does not provide an indication that preventative measures are in place to monitor the waste rock piles to enable early detection of a problem. Further detail should be provided to demonstrate that acidic drainage would be contained and analysed to determine the requirements for further treatment.

Similarly, explosive products are addressed by a statement that they will be stored in appropriate facilities at designated explosive storage sites. The Licensee should provide clarification as to the design of the facilities and how they will mitigate human health and environmental impacts.

Calcium Chloride is described as not requiring any special treatment and having minimal environmental concern. In fact, salts move rapidly with water into surrounding soils and components of the salt may enter surface waters, potentially degrading water quality. In

soil, salts reduce the availability of water to plants, and salts directly applied to foliage may also burn and kill the affected parts. It is recommended that rock salt be stored in a dry area that will prevent contamination of the surrounding environment. Salt spills should be cleaned immediately to prevent damage to water, soil or vegetation.

The Guidelines for Contingency Planning suggest that plans should establish migratory paths for spills and include a site plan and plan drawings of relative facilities. In addition, a detailed sequence of actions to properly contain, recover, and dispose of the spilled material, and follow-up restorative measures should be included. These additions will ensure that the Plan becomes a useful tool for all HBJV staff involved in environmental management. Should you have any questions or comments, please do not hesitate to contact me at the number above or by e-mail at johnsonmi@inac.gc.ca.

Sincerely,
Original signed by:

Michelle Johnson
Kivalliq/Kitikmeot Regional Coordinator

c.c. C. Bodykevich, Water Resource Officer
H.R. Wilson, Hope Bay Joint Venture