

August 12, 2009  
3.393, G0-02

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**Re: Inspector Direction August 13, 2008 – Outstanding Issues**

The Inspectors Directive of August 13, 2008 pertaining to NWB License 2BB-MEL0709, recently renewed as 2BB-MEL0914, is summarized below along with the status of responses by Comaplex to the directive.

- *Immediately cease the activity of urinating out of doors and to provide the Inspector within 30 days a plan to address this waste management issue*

All toilets wastes are incinerated pending commissioning of our waste water treatment system. The renewed July 31, 2009 water license allows Comaplex to continue to incinerate toilet wastes prior to commissioning the new waste treatment system.

- *Within 30 days install flow meters on the intake for all domestic and drilling uses of water*

A flow meter for domestic water has been installed on the camp line. This meter measures the direct water use in the camp via an improved system of constantly circulating water within heat traced piping to ensure the water line from Meliadine Lake does not freeze in winter. This system was found to be to the satisfaction of the Inspector on his August 1, 2009 inspection.

Comaplex has reviewed the NWB's interpretation of what defines water usage and while it does not agree with the determination, it will respect it. As per the decision by the NWB on water use in renewed License 2BB-MEL0914 Part III: General Considerations –

D – Water Use (July 31, 2009), Comaplex has ordered flow meters for the drills and the drill contractor has been instructed to install them. We expect these to be in place prior to August 21, 2009, the date agreed to with the Inspector.

Comaplex will calculate the water usage amounts based on the terms and conditions of the July 31, 2009 renewal license and anticipates having to submit an amendment request for License 2BB-MEL0914 with respect to daily amounts.

As stated in the July 31, 2009 License, the NWB comments that the water meters on the water intakes for the drills and for camp “may not reflect the actual water consumption”. The concern remains that Comaplex will be paying water fees for water ‘usage’, not water consumption.

- *To within 30 days discontinue the discharge of grey water at the current location and install means by which grey water will not be deposited directly into Meliadine Lake.*

Comaplex has never deposited grey water *directly* into Meliadine Lake. Grey water is passed through a sump before discharging to a wetland area. We are trying to decommission the old wetlands in favor of a completely upgraded waste treatment system that includes a BIODISK waste water treatment plant and an upgraded sump and wetland system.

Preliminary details of this plan have been forwarded to regulators and have met with general approval pending the submission of more detailed design drawings and plans. These detailed plans are in preparation and Comaplex is obligated to submit them in a revised Waste Management Plan before September 30, 2009 (60 days) as a condition of License 2BB-MEL0914.

Subject to Comaplex providing additional information, the NWB has generally approved a waste water system where treated waste (including greywater) from the Biodisk system can ‘be directed to the wetlands sump’. The license also states that “... all discharges ... are to be directed to land such that direct flow into a water body is not possible and no additional impacts are created”. This is the case with the present system for greywater. Furthermore, Comaplex has sent a letter to the NWB dated July 21, 2009 requesting permission to continue to use the wetlands system (switching to the new wetlands area when approved) for the greywater, with eventual overflow into Meliadine Lake, as per previous years.

- *To undertake and provide within 30 days a report signed and stamped by an engineer certified and licensed to work in the Nunavut Territory, detailing the structural integrity of the installed secondary containment and the ability of that containment in it’s current configuration to prevent the release of hydrocarbons into the environment.*

and

- *To undertake and provide to the inspector within 30 days a report detailing the capacity of the secondary containment currently in use for these Bladders taking into account the deformation of the surrounding material encroaching on the side walls of the containment structure. This report should also indicate if the current capacity of the secondary containment is adequate to hold 110% of the capacity of the bladder.*

and

- *To cease using the 2 aforementioned bladders contained at the site until such time as the reports noted above are submitted, reviewed and accepted by the Inspector.*

and

- *To install barrier devices and other adequate means to prevent accidental damage from mechanized vehicles prior to continuing to use the Bladders on site.*

Comaplex removed the bladder and insta-berm installations referred to above shortly after the inspection of August 13, 2008. Subsequently, Comaplex submitted an amendment request to construct an engineered fuel facility that has been approved by both the NWB (December 2, 2008) and the KIA. Comaplex reserves the right to construct the facility under renewed license 2BB-MEL0914.

- *Within 30 days apply to the Nunavut Water Board for an amendment to the current license to allow for land farming activities as found on site or to remove the noted contaminated soils from site within the same time period.*

Comaplex has received direction for hydrocarbon stained soils contained on the impermeable liner at its Meliadine West development site, in the terms and conditions of renewed license 2BB-MEL0914. Two recent tests of the material indicate rehabilitation of the soil to CCME recreational soil guidelines. As well, a third independent sampling program has been initiated by Golder Associates and the results will be forwarded to the Board and the Inspector once received.

The renewed license goes on to say that future contact water discharges and final remediation of the facility are subject to treatment objectives (laid out in the license) and a revision to the A&R Plan. Final remediation approvals are required from Nunavut EPS and KivIA before the soil will be considered acceptable for future use.

- *To provide the results of all baseline sampling conducted in accordance with the issued Bulk Sampling license as per the Inspector's request made during the period of inspection.*

Comaplex has forwarded all baseline and monitoring data to the INAC inspector. All of this data currently resides on the NWB website contained in submissions to the water board. Comaplex believes that one central repository of data for applicants and regulators, best serves the interests of all parties. This ensures everyone has access to the

same material and avoids potential differences in datasets maintained by different parties. Comaplex has in the past received sampling and data requests from regulators that are not distributed to all interested parties and believes this is a potential area of conflict. The NWB ftp site functions as a central repository of data and correspondence.

Yours Truly

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cc. RCF - Attn. Russ Cranswick