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Department of Environment

Ministère de l'Environnement

Jan. 2, 08

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board

Via e-mail to: licensing@nunavutwaterboard.org

**RE: NWB FILE # 2BB-MRY 0710 – BAFFINLAND IRON MINES CORP. –
AMENDMENT TO BULK SAMPLING & GEOTECHNICAL DRILLING &
EXPLORATION PROJECT**

Dear Ms. Beaulieu:

The Government of Nunavut, Department of Environment (DOE) has reviewed the amendment water license application for the bulk sampling, geotechnical drilling and exploration project submitted by the Baffinland Iron Mines Corp. DOE believes the amended application will not result in significant environmental impacts although potential for negative environmental effects exists. In addition to the terms and conditions outlined under the NWB water license for the original application, DOE has further comments to make, related to spill contingency planning, and waste incineration based on DOE's mandate under the *Environmental Protection Act*.

1. SPILL CONTINGENCY PLAN:

DOE understands Baffinland plans to update the spill contingency plan to reflect the amended application. In addition this update, DOE further recommends the following to be included in the spill plan, based on DOE's *Spill Contingency Planning and Reporting Regulations*.

- All fuel storage drums should be situated in a manner that allows easy access and inspection as well as removal of drums in the event of leaks or spills. Large fuel caches in excess of 20 drums should be inspected daily. Additionally, the proponent is strongly advised to keep a written log of the inspections. For long term storage (> 6 months), it is strongly recommended that drummed fuel be stored on pallets to prevent the bottoms from rusting out.
- Detailed site maps of various fuel caches in association with nearby facilities, should not be submitted as stand-alone documents; the maps should be

included as part of the spill plan. This would be beneficial for spill responders who are unfamiliar with the sites, to easily locate the maps.

2. WASTE INCINERATION

The Government of Nunavut is signatory to *Canada-Wide Standards (CWS) for Dioxins and Furans*, and *Canada-Wide Standards for Mercury Emissions*, and it is important that emissions from camp waste incineration complies with the CWSs.

Under the Term & Condition #21 in the Part D of the NWB water license (# 2BB-MRY0710), the applicant is required to utilize appropriate technology and a comprehensive waste management strategy to demonstrate emission compliance with the CWSs. In the amended application, the applicant indicates the type of incinerator is currently used; however, it is not clear if this incinerator is capable of meeting the standards. DOE therefore recommends the applicant submits annual reports to demonstrate compliance with CWSs, and the report is recommended to include, but not limited to the following:

- Incinerator specifications;
- Amount and types of wastes incinerated;
- Operation & maintenance records (i.e., incinerator maintenance records and operator training logs);
- Waste management strategy (a strategy used to reduce the volumes of wastes incinerated, produced, transported and disposed of);
- Monitoring procedures and results (i.e., stack testing);
- Disposal methodology for incineration ash.

DOE thanks NWB for the opportunity to provide comments on Baffinland Iron Mines Corp. amended water license application. Please contact us if you have further questions.

Sincerely,

Yours sincerely,

Original signed by

Helen Yeh
Coordinator, Environmental Assessment
Department of Environment
Government of Nunavut