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Sept 10, 2007

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RE: Baffinland Iron Mines – Bulk Sampling Program Abandonment and Restoration Plan - NWB
2BB-MRY0710/TR/H1

On behalf of Environment Canada (EC), I have reviewed Baffinland Iron Mines Corporation's Abandonment and Restoration Plan, submitted as a requirement of Part H, Item 1 of water license 2BB-MRY0710. The following specialist advice has been provided pursuant to Environment Canada's mandated responsibilities for the enforcement of the *Canadian Environmental Protection Act*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

As per Item 22 of the Water License the licensee shall backhaul and dispose of all hazardous wastes, waste oil and non-combustible waste generated through the course of the operation to an approved waste disposal site. Baffinland also lists oils as a hazardous material in section 2.19.3 Hazardous Materials Management, Environmental Screening Document. It is EC recommendation that the Abandonment and Restoration Plan, which currently states "Waste oil and residual fuels will be burned in the camp incinerator" be changed to reflect the proponents commitment to handling hazardous waste appropriately as well as their obligation to the terms and conditions of the water license.

As per Item 21 of the Water License the licensee may incinerate all food waste, paper waste and wood products in an incinerator capable of meeting the emission limits established under the Canada wide Standards for Dioxins and Furans the Canada-wide Standards for Mercury Emissions. EC is concerned with possible effects of dioxin and furan emissions which can occur due to the incineration of certain wood structures and therefore requests that only clean wood, wood that has not been coated with preservative chemicals or paint, be considered for incineration.

If there are any changes in the proposed project, EC should be notified, as further review may be necessary. Please do not hesitate to contact me with any questions or comments with regards to the foregoing at (867) 975-4631 or by email at cindy.parker@ec.gc.ca.

Yours truly,

Original signed by

Cindy Parker
Environmental Assessment Specialist

Cc: Carey Ogilvie (EA-North Head, Environment Canada, Yellowknife, NWT)