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Department of Environment

Ministère de l'Environnement

Phyllis Beaulieu Manager of Licensing Nunavut Water Board

via Email to: licensing@nunavutwaterboard.org

RE: NWB No. 2BB-MRY0710 Mary River Project Baffinland Iron Mines Revised Waste Water Management Plan D13

Dear Ms. Beaulieu:

The Government of Nunavut, Department of Environment (DOE) has reviewed the Revised Waste Management Plan D13 from Mary River Project Baffinland Iron Mines, and has the following comments and recommendations to make based on the Environmental Protection Act.

WASTE MANAGEMENT

1. Incineration

The proponent shall apply appropriate technologies to ensure complete combustion of wastes, and the use of a dual chamber, controlled-air flow incinerator is recommended. Both the Government of Canada and the Government of the Nunavut are signatories to the Canada-Wide Standards for Dioxins and Furans and the Canada-Wide Standard for Mercury Emissions, and to implement them according to their respective jurisdictional responsibility. Installation of an incineration device capable of meeting the emission limits established under these standards is required. Compliance with the Standards shall be demonstrated with an initial stack test upon commission of the incinerator at site, the results of which shall be submitted to the Nunavut Water Board, Nunavut Impact Review Board, Environment Canada, and Government of Nunavut-Department of Environment. During the course of operations, the proponent shall make determined efforts to achieve compliance with the Canada-wide Standards for dioxins and furans and the Canada-wide Standard for mercury. Determined efforts shall include but not be limited to appropriate record management, including maintenance reports, operator training logs, and the submission of an annual report that outlines the efforts made to achieve compliance with the Standards.

2. Sludge Management

DOE recommends that the proponent submit a stand-alone sludge management plan. This plan should reflect the sludge sampling work undertaken to date and the current state of the landfill site.

DOE thanks the NWB for the opportunity to provide comments on the Mary River Project Baffinland Iron Mines Revised Waste Management Plan D13. Please contact us if you have further questions.

Yours sincerely,



Original signed by

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