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NUNAVUT WATER BOARD
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Hugh Wilson
Hope Bay Joint Venture
Miramar Hope Bay Ltd.- Cambiex Exploration Inc.
311 West First Street, North Vancouver, B.C. V7M 1B5
Fax-604-980-0731

Date: July 3, 2001

Re: NWB2HOP0002 – Spill Contingency Plan

Dear Mr. Wilson:

The Nunavut Water Board has granted conditional approved the report titled, "**Spill Contingency Plan**", received June 13, 2000 by Hope Bay Joint Venture in compliance with Part E, Item 1 and Part F, Item 1 respectively of their current water licence. Please resubmit a revised plan to the NWB within thirty (30) days, in which the following provisions are included:

- Amend the Plan in accordance with Amendment #1, issued by the NWB on August 22, 2000 for sewage treatment, greywater and sludges.
- Amend the Plan to address the attached comments by Anne Wilson of Environment Canada dated July 17, 2000.
- Ensure that a map of hazardous materials storage and location of spill kits are submitted for all three camps.
- Include the DIAND Inspector in Iqaluit (867) 975-4298 as one of the people who should be notified.
- Update regional telephone lists with appropriate contacts.
- Ensure that an on-site Spill Response Coordinator is identified. Although a list of Coordinators is provided on pg. 11, the contact numbers appear to be in Vancouver; therefore it is not clear whether they Coordinator is immediately accessible to the camp staff.
- Include how hazardous waste will be removed from site and authorizations that are necessary for hazardous waste removal.

The NWB also respects the proponent's policy with regard to identifying its environmental liability, we would however like to remind the proponent that all spills on-site, and for activities associated with the project, are the responsibility of the Licensee. Please ensure that all spills are handled appropriately by trained personnel as per the Spill Contingency Plan and reported to the 24-hrs Spill Line.

If you have any concerns or questions, please do not hesitate to contact me at 867-360-6338 or by fax 867-360-6369 or e-mail dionne@polarnet.ca



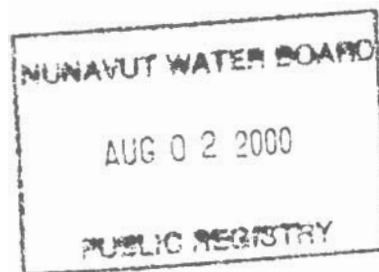
Dionne Filiatrault
Technical Advisor

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July 17, 2000

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Re: Miramar Hope Bay and Cambiex Exploration Inc. - Water Licence NWB2HOP00 - Spill Contingency Plan

The above document has been reviewed by Ed Collins and myself on behalf of the Environmental Protection Branch, Environment Canada (EPB) and the following comments are offered for your consideration:

Section 2.2 No details are given for the greywater treatment systems in use at Windy Lake and Wolverine camps; information should be provided on how the system operates, capacity, and usual volumes.

Section 2.3 What types of wastes are acid-producing? It is difficult to assess spill potential without better detail on this.

Section 2.4 I think a comma belongs after 2000 - there likely aren't that many fuel tanks at large? With respect to fuel storage, this section does not confirm whether tanks are bermed, nor describe berm capacity. Even if tanks are double-walled, leakage from a valve could occur and the clean-up would be considerably more extensive if unbermed.

Section 2.5 Chemicals used include CaCl₂, and the statement is made that use of this does not warrant environmental concern. The proponent should be aware that potential effects on vegetation and aquatic biota associated with CaCl₂ are such that it is being considered for the second Priority Substances List, to determine if it should be declared toxic. Accordingly, any brine spills should be properly cleaned up and planned against.

Section 3.1 Are there more than one mechanical treatment systems? Also, design load is specific to the system installed; what would cause this to change?

Section 3.2 Similarly, how would changes in design load occur, and how would this result in malfunction?

Section 3.3 For the first list, the activity with the highest potential for spillage is during transfer operations, and this is missing from the list. In the second list (4th bullet) spill response training is not a measure which will minimize spills, nor is maintaining an emergency fuel cache.

Chapter 5. This contains the major scenarios that could be expected, however the text does not provide a great level of detail. In many cases, it merely presents a list of options that could be tried rather than a response as the chapter title suggests. In the discussion of each scenario, the response should cover four basic facets of spill response: Containment, treatment, disposal, and remediation. By following this template, most potential problems can be anticipated and handled.

Section 6.1 Information should be provided on what heavy equipment is available at each site.

Section 6.3 "Believed to be available" is too tenuous - the availability and location of the spill response unit, as well as transportability and delivery time need to be established.

Section 7.1 There are no responsibilities listed for the Project Manager. The Spill Response Coordinator should also report the spill to the Logistics Coordinator. Also, the Spill Response Coordinator should assess all cleanup measures, not just burning.

Chapter 8. The Spill Report Form is not attached at the end of the report.

Chapters 10-12. Under disposal options, 'burial at an approved site' is listed. It should be clarified that this entails removal to a secure landfill facility - and is not intended for field disposal of hydrocarbons or antifreeze-contaminated soils. Landfarming of hydrocarbons at a properly engineered site could also be listed as an option.

Please do not hesitate to contact me at (867) 669-4735 with any questions or comments regarding the foregoing.

Yours truly,

Anne Wilson
Water Pollution Specialist

cc: Steve Harbicht (Head, Assessment & Monitoring, EPB)
Ed Collins (Head, Environmental Engineering, EPB)