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Department of Environment

Ministère de l'Environnement

April 27, 06

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board

via Email to: licensing@nunavutwaterboard.org

RE: NWB2BE-HOP – MIRAMAR HOPE BAY LTD. – HOPE BAY WINDY PROJECT

Dear Ms. Beaulieu:

The Government of Nunavut, Department of Environment (DOE) has reviewed the water license renewal application from the Miramar Hope Bay Ltd. for the Hope Bay Windy project for conducting gold exploration approximately 50 km east of Umingmaktok. The DOE believes the project will not result in significant adverse effects although the potential for negative environmental impacts exists. Based on the *Environmental Protection Act* and the *Wildlife Act*, the DOE has the following comments to make regarding wildlife, spill contingency and air quality.

1. WIDLIFE

The project is located in an area where grizzly bears, caribou, musk oxen, foxes, wolverines and raptors may be encountered. Page 9 of the *Exploration/Remote Camp Supplementary Questionnaire* provided the 2005 Final Environmental Impact Statement (FEIS) for the Doris North Gold Mine project, as a reference for wildlife baseline data for the Hope Bay Windy project due to proximity of the two projects. DOE is uncertain if this reference to the FEIS means that management, mitigation and monitoring measures identified in the FEIS would be applied to the Hope Bay Windy project. The DOE has not formally approved the Wildlife Mitigation and Monitoring Plan (WMMP) submitted by the proponent as part of this FEIS, but feels that key management and mitigation components identified in the current draft should be sufficient to mitigate impacts from this exploration project

2. SPILL CONTINGENCY PLAN:
Based on the DOE *Spill Contingency Planning and Reporting Regulations, Contingency Planning and Spill Reporting in Nunavut: a Guide to the New*

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Regulations, and *Guideline for the General Management of Hazardous Waste in Nunavut*, we have the following comments and recommendations to make:

- All fuel tanks, connectors and associated plumbing should be installed in a manner that meets current acceptable codes for the installation of such appliances. Fuel tanks should be situated on solid platforms, on a stable base, and should be inspected regularly for leaks and movement (shifting). Flex connectors, if used, should be installed as per manufacturer's instructions and should be inspected regularly.

- It is advised to keep a stock of 55 gallon “overpack” or “salvage” drums. These afford a safe, effective and rapid means for containing leaking drums.

- It 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.

- It is unclear whether or not the contact number provided is a 24-hour number. The 24-hour number for the persons responsible for activating the contingency plan is required as this ensures the employee discovering the spill can activate a response and provides a 24-hour point of contact for the authority investigating the spill.

- A site map is intended to illustrate facility relationship to other areas that may be affected by the spill; maps of all fuel cache locations should be included in a spill plan. The application indicated fuel is stored at the Windy camp, Roberts Bay and Patch Lake, but only the site map for the Windy camp was provided.

- A detailed description of the spill response training that will be delivered to emergency responders should be included with the plan. The qualifications and background of the instructor(s) as well as well as a course outline should also be provided. This information is useful to regulatory agencies in that it allows them to determine how well-prepared the proponent is to deal with hazardous materials spills.

- The DOE monitors the movement of hazardous wastes from generators, carriers to receivers, through a tracking document (Waste Manifest). A Waste Manifest must accompany all movements, and all parties must register at DOE with Robert Eno at reno@gov.nu.ca or (867) 975-7748.

- The NWT-Nunavut spill report form has been updated, and can be obtained from the Spill Line. The proponent is advised to enter spill information electronically in the form so the information is legible to regulators inspecting spills.

3. AIR QUALITY

Dioxin, Furans and Mercury Emissions & Camp Incinerator

The Government of Nunavut is signatory to the *Canada-Wide Standards (CWS) for Dioxins and Furans*, and Canada-*Wide Standards for Mercury Emissions*. We DOE therefore request the proponent ensures incineration emissions comply with the CWS by implementing the following recommendations.

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. Compliance with the Standards shall be demonstrated with an initial stack test upon commission of the incinerator at site. Additionally, the proponent shall implement a waste management strategy (especially waste segregation) that is designed to reduce and control the volumes of wastes produced, transported, and disposed of. The Waste Management Strategy should consider and include:

- Purchasing policies that focus on reduced packaging;
- On-site diversion and segregation programs (i.e. the separation of non-food waste items suitable for storage and subsequent transport and disposal or recycling);
- If incineration is required, ensure diligent operation and maintenance of the incineration device and provide appropriate training to the personnel operating and maintaining the incinerator.

Waste wood treated with preservatives such as creosote, pentachlorophenol or heavy metal solutions should not be burned. Additionally, plastics, electrical wire, asbestos and building demolition wastes (except clean wood) are wastes likely to produce dioxins and furans when burned and should be excluded from incineration. Furthermore, incineration of hazardous wastes is prohibited. In the case of waste oil incineration as indicated in the application, the proponent should demonstrate the incineration emission comply with the CWS.

Particulate Matter and Ozone Emissions

The Government of Nunavutt is a signatory of the *Canada Wide Standards for Particulate Matter and Ozone*. This places a duty on jurisdictions to take '*remedial and preventative action to reduce emissions from anthropogenic sources in the areas'.* The proponent must consider proactive approaches to address these impacts particularly exhaust emissions from fuel combustion and dust from project activities such as ground transportation and drilling activities.

Green House Gas Emissions

Greenhouse gas emissions and energy efficiency are a primary concern for GN and form an integral part of the GN cabinet approved Climate Change Strategy. One of the goals of GN approved Nunavut Climate Change Strategy is to '*encourage Nunavumiut including governmental, non-government, industry and the public to take action to reduce red GHG emissions through energy management and alternative energy supply options*'. DOE therefore requests that the proponent practices energy conservation and efficiency, and also shows "good corporate practice" to utilize applicable alternative energy developments wherever possible, that would contribute towards reduction in greenhouse gas production.

The DOE thanks the NWB for giving us the opportunity to review and provide comments on the Hope Bay Windy project water license renewal application. Please contact us if you have any further questions or comments.

Yours sincerely,

Original signed by

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