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EC File: 4703 001 016
NWB File: 2BE-HOP0712

Phyllis Beaulieu
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Nunavut Water Board
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Via email: licensing@nunavutwaterboard.org

RE: 2BE-HOP0712 Quarry A, B & D Management and Monitoring Plan – Request comments

Environment Canada (EC) has reviewed the information submitted with the above-mentioned amendment application to the Nunavut Water Board (NWB). The following specialist advice has been provided pursuant to the *Canadian Environmental Protection Act*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

Hope Bay Mining Ltd. (HBML) has prepared Quarry A, B & D Management and Monitoring Plan as a requirement of Part D, Item 25 of water licenses 2BE-HOP0712. Quarried materials from the three quarries along the proposed road alignment will be used for fill. The rock from each quarry has been characterized geochemically as not potentially acid generating and has been approved by the responsible regulatory agencies.

Based on the provided Quarry Management Plan, EC provides the following comments for the NWB's consideration:

- The proponent shall not deposit, nor permit the deposit of chemicals, sediment, wastes, or fuels associated with the project into any water body. According to the *Fisheries Act*, Section 36 (3), the deposition of deleterious substances of any type in water frequented by fish, or in any place under any conditions where the deleterious substance, or any deleterious substance that results from the deposit of the deleterious substance, may enter any such water, is prohibited.
- Section 3.1.1 of the Plan indicates that the rock proposed for use in road construction is non-acid generating. However, the reference on which this statement was based (i.e., *Geochemical Characterization of Quarry Materials for the Doris-Windy All-Weather*) was not provided. To that end, EC would appreciate if the proponent could provide this reference to allow our review and confirmation of the acid generating potential of the quarried rock.
- It is recommended that an undisturbed buffer zone of at least 100 metres be maintained between any quarrying that may occur and the normal high water mark of any water body.
- The proponent shall ensure that silt fences/curtains are installed down gradient of any quarrying activities.

- No disturbance of the stream bed or banks of any definable watercourse is permitted; clearing adjacent to streams/lakes should be done without disturbing the organic layer.
- EC recommends that a Spill Contingency Plan be prepared for the operation of the quarry. The possibility of broken fuel lines and hydraulic hoses likely exists with the heavy equipment to be operated at the site. The proponent should have a Spill Contingency Plan that outlines a clear path of response and should include, but is not limited to, the following:
 - Operational practices for the handling of fuels and hazardous fluids;
 - List of persons to be contacted in the event of a spill; and,
 - Location of equipment, both on and off site, to be used in the event of a spill.
 - Please note that any spill of fuel or hazardous materials, adjacent to or into a water body, regardless of quantity, shall be reported immediately to the NWT 24-hour Spill Line at (867)920-8130.
 - Also, an appropriate spill kit with absorbent materials should be located at the quarry site while equipment is operating and drip pans should be used when refueling equipment.
- EC recommends that an Abandonment and Restoration Plan be prepared for the proposed quarry site. This Plan should contain the proponent's reclamation objectives and procedures for the area affected by excavation activities. EC suggest that the Plan include both seasonal shutdown and final abandonment and restoration procedures.

Comments previously submitted on behalf of EC regarding water licenses 2BE-HOP0712 and would still apply to this project. 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 the undersigned with any questions or comments with regards to the foregoing at (867) 975-4631 or by email at Paula.C.Smith@ec.gc.ca.

Yours truly,



Paula C. Smith
Environmental Assessment Coordinator

cc: Carey Ogilvie (Head, Environmental Assessment-North, EPO, EC, Yellowknife, NT)
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