



Environment Canada
Environnement Canada

Environment Canada
Prairie and Northern Region
#301-5204 50th Ave.
Yellowknife, NT X1A 1E2

February 8th, 2008

Our file: 4703 001 016
Your file: 2BE-HOP0712/TR/E5

Richard Dwyer
Licence Administrator
Nunavut Water Board
Gjoa Haven, NU X0B 1J0

By email

**Re: Miramar Hope Bay Ltd. – Submission of Waste Water Treatment Facility
Operation and Maintenance Manual - 2BE-HOP0712/TR/E5**

On behalf of Environment Canada (EC), I have reviewed the Waste Water Treatment Facility Operation and Maintenance Manual submitted by Miramar Hope Bay Ltd. This review has been done with a focus on 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*. The following comments on the manual are provided for your consideration:

- Section 4.5 discusses erosion control protection and what should be in place; however there is no discussion of monitoring the effectiveness of the method used. The manual should contain information on how often monitoring will occur to ensure that the erosion control protection is in fact being protective. This could also be included in the monitoring section of the plan.
- Section 6.1 states that the "Employees working in the Waste Water Treatment Facility will be trained prior to commencement of work...". This statement refers to health and safety, however the type of training for the operation and maintenance of the facility should also be included to ensure that employees are trained at a consistent level and all employees have the same operational training. This ensures that there is no loss of information should there be any turnover in employment.
- There are several points that discuss maintenance of the facility and the schedule, however it may be more useful to have it all in one table and set up as a maintenance schedule that is easily followed. This could also be applied to the monitoring program.
- The manual should also include an emergency/contingency plan that describes what measures would be taken if the facility was unable to operate. There should also be safety and emergency contact information provided at the facility should an environmental emergency occur.

- There is no mention of any source control for wastes such as grease, solvents or cleaners, this should be discussed as the system can be adversely affected by inputs to the system that upset the biological community.
- It was noted that on page 4 of the manual under section 2.0 Applicable Legislation that the two treatment facilities are operating under Type A water licences. It appears this is a typo and should read 'Type B' water licences.

Please do not hesitate to contact me with any questions or comments with regards to the foregoing at (867) 669-4772 or by email at savanna.levenson@ec.gc.ca.

Yours truly,

Savanna Levenson
Environmental Assessment Specialist
Environmental Protection Operations

cc: Carey Ogilvie, Head EA North, Environment Canada
Mike Fournier, Coordinator EA North, Environment Canada
Anne Wilson, Water Pollution Specialist, Environment Canada