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Department of Environment

Ministère de l'Environnement

Aug. 28, 06

Richard Dwyer Licensing Trainee Nunavut Water Board

via Email to: licensingtrainee@nwb.nunavut.ca

RE: 2BE-JAC – TWIN MINING CORP. – JACKSON INLET PROJECT WATER LICENSE RENEWAL APPLICATION

Dear Richard:

The Department of Environment (DOE) has reviewed the water license renewal application from Twin Mining Corp. for conducting diamond exploration near Jackson River, and has the following comments and recommendations.

1. SPILL CONTINGENCY PLAN:

Based on the Government of Nunavut Spill Contingency Planning and Reporting Regulations and A Guide to the Spill Contingency Planning and Reporting Regulations, DOE has the following comments to make:

- The Spill Line contact phone number is (867) 920-8130, and should be corrected in the spill plan.
- The site map submitted is insufficient in details. A site map is intended to illustrate the facility relationship to other areas that may be affected by a spill. The map should include details such as site location, fuel storage facilities, nearby buildings, roads, culverts, drainage patterns, and any nearby bodies of water.
- Fuel storage method provided is insufficient in details. It should provide information in regard to the fuel type and fuel quantity. In addition, to prevent spreading in the event of a spill, fuel stored in drums should be located, whenever practical, in a natural depression a minimum distance of 90 feet from all streams, preferably in an area of low permeability. This procedure was not indicated in the spill plan.

PH: (867) 975-7733

FX: (867) 975-7739

2. ABANDONMENT & RESTORATION (A&R)

Based on DOE's *Environmental Guideline for Site Remediation*, DOE has one comment to make:

For camps of 10 to 50 people, it is recommended that a forced air incinerator be used to manage wastes. Once again maintaining a high temperature burn to reduce wastes is imperative. Kitchen wastes, cardboard, paper products, packaging and untreated wood wastes are suitable for burning in a forced air incinerator. Industrial wastes and non combustible wastes should be removed from the camp and disposed of at a designated landfill or other approved facility. Under no circumstance should hazardous wastes be managed through burning or incineration.

3. HAZARDOUS MATERIAL MANAGEMENT

Based on the Government of Nunavut *Environmental Guideline for the General Management of Hazardous Waste*, DOE has one comment to make:

 DOE-Environmental Protection Service (EPS) monitors the movement of hazardous wastes such as waste fuel, from generators, carriers to receivers, through a tracking document (Waste Manifest). A Waste Manifest must accompany all movements, and all parties must register with the EPS. There is no mention of this procedure in the application.

4. WILDLIFE

Bear-People Conflicts

The operation is in an area where bears may be encountered. Proper food handling and garbage disposal procedures should be followed to reduce the likelihood that bears will be attracted to the operation. Careful planning and attention to details of camp design and maintenance will decrease the attraction of bears to the camp.

The applicant should follow procedures outlined in the "Safety in Bear Country Manual", and should contact the Regional Manager of Wildlife or Area Biologist indicated below for information and advice on measures which should be taken to minimize the possibility of bear-people conflicts.

DoE Contacts

Regional Manager, Wildlife

- Seeglook Akeeagok, (867) 975-7800, sakeeagok@gov.nu.ca Biologist, Baffin Region,
 - Debbie Jenkins, (867) 899-8876, pondbiologist@qiniq.com



We thank NWB for giving us the opportunity to review and provide comments on the Twin Mining Corp. water license renewal application. Please contact us if you have any further questions or comments.

Yours sincerely,

Original signed by

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