



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence
2BE-KIG1823
Our file - Notre référence
GCDocs#109190731

January 30, 2023

Robert Hunter
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: licensing@nwb-oen.ca

Re: Crown-Indigenous Relations and Northern Affairs Canada's Reply to Orano Canada Inc's Reply to CIRNAC's comments on the Review of the Licence Renewal Application for Kiggavik Project, Type B Water Licence No. 2BE-KIG1823

Dear Robert,

Thank you for the January 25, 2023 invitation to review the reply of Orano Canada Inc's (Ornao) reply to CIRNAC's comments on the referenced licence renewal application, submitted by Orano, for Type B Water Licence No. 2BE-KIG1823.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the application pursuant to its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*. Please find CIRNAC comments and recommendations in the attached Technical Memorandum. Please note recommendations numbered 1 to 4 and 7 to 11 inclusively are considered answered and CIRNAC has no further comments to provide.

If there are any questions or concerns, please contact me at (867) 975-3877 or Joyce.Demers@rcaanc-cirnac.gc.ca or Andrew Keim at (867) 975-4550 or Andrew.Keim@rcaanc-cirnac.gc.ca.

Sincerely,

Joyce Demers, B.Sc.,
Industrial Coordinator



Technical Review Memorandum

RESULTS OF REVIEW

5. Missing MSDS

Comment:

There were no provided MSDS in the Spill Contingency Plan. This is a concern because the MSDS provide valuable information on how to clean up spills.

Recommendation:

(R-05) CIRNAC recommends that the application provide the MSDS for all hazardous materials brought to the camp, such as, but not limited to: the different kinds of fuels, oils/lubricants and cleaning products be submitted in the final version of the Spill Contingency Plan.

Orano Response:

SDS are not included as part of the Spill Contingency Plan. They are available on site during the active exploration phase.

CIRNAC's Response:

CIRNAC repeats comments and recommendation previously stated if there are any hazardous materials, in any quantity, being stored at the camp.

6. Single Chamber Incinerator Used

Comment:

In the Abandonment and Restoration Plan (under section 3.3 waste) the applicant states that they plan on using a single chamber incinerator. This is a concern due to the possibility of incomplete combustion and the release of dioxans and furans, which may allow contaminants entry into adjacent water bodies.

Recommendation:

(R-6) CIRNAC recommends that the applicant use at least a dual chamber incinerator

Orano Response:

The Abandonment and Restoration Plan Section 1 states "The applicable requirements in Section 3 were fulfilled in 2016 and will be considered to be met until the project changes phase". The single chamber incinerator is the current incinerator on site. The incinerator will be reviewed against regulatory requirements at the time the project changes phase.

CIRNAC's Response:

CIRNAC repeats comments and recommendation previously stated.