



Sanikiluaq

v. **Milne Inlet – Construction and use of 1 x 1.5 ML Jet fuel tank and 5 ML diesel fuel tank** – The NWB issued approval for modification² to the existing Type B water

² August 12, 2011 letter from NWB to BIMC titled “2BB-MRY1114 Type “B” – Action Plan for Decommissioning of Milne Inlet Bulk Fuel Storage Facility and the Construction of New Fuel Tank Storage”.



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discharge and effluent quality specified in the water licence. It is requested that effluent discharge quality for the new fuel storage facility be consistent with discharge quality applied to the Milne Inlet fuel bladder facility.

- e. Specification H337697 – Aboveground Fuel – Storage Tanks is general and specifies two 1.5 ML tanks. The drawings depict one tank for installation. **Clarification is requested that only one 1.5 ML tank is proposed for installation.**
- f. Specification H337697 – Aboveground Fuel – Storage Tanks is general and specifies hydrostatic testing; however, does provide specification in lieu of hydrostatic testing. **Based on previous site experience by BIMC, clarification is requested if hydrostatic testing will be completed. If hydrostatic testing is completed, additional details, as outlined in the SIG for hydrostatic testing is requested.**

- vi. **Milne Inlet – Decommissioning of fuel bladders** –It is uncertain if the decommissioning of the Milne Inlet fuel bladder facility is scoped into the current water licence (2BB-MRY-1114) or requested for inclusion in the new Type B water licence. **Clarification from NWB of this interpretation is requested.**

- vii. **Milne Inlet – Landfarm –**

- a. EBA December 2010 document titled “Hydrocarbon impacted soil storage and landfarm facility operations, maintenance and monitoring plan Milne Inlet, Mary River Project Nunavut” is noted as “issued for review”. **A final “issued for use” operations and maintenance (O&M) plan for the landfarm facility is requested as a term and condition of the new water licence. The final O&M plan is requested to be submitted to the NWB for review and approval prior to use of the landfarm facility.**
- b. **A final landfarm design report with construction specifications is requested for submission to the NWB for review and approval prior to construction. It is requested that the design report, and engineering drawings, be signed and stamped by a qualified engineer.**
- c. BIMC provided “not for construction” drawings in the O&M plan. **For-construction engineering drawings, signed and stamped by an engineer are requested. As-built drawings, signed and stamped by an engineer are requested.**
- d. **It is requested that a SNP be established at the sump of the landfarm. It is requested that an effluent quality criteria be specified in the water licence for the discharge of effluent waters from the landfarm. It is requested that effluent criteria should be consistent with discharge waters for the fuel containment facilities at Milne. The location for discharge is requested and included in the water licence.**



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- e. It is requested that soil quality remediation objectives utilize Federal guidelines (e.g., CCME) instead of the BIMC recommended Nunavut guidelines. The Nunavut guidelines are applicable for Commissioner's lands not Inuit Owned lands or Crown lands. As recommended by BIMC, the agricultural/wildland hydrocarbon criteria are applicable for treated soils returned to the environment. **It is requested this treatment criteria be included in the water licence.**
- f. It is requested that soil and water monitoring results are presented in the water licence annual report. Frequency of monitoring, as recommended by BIMC, should be included in the water licence. When treated soil is returned to the environment, it is recommended that soil monitoring data be compared to criteria and presented in the annual report with soil volumes removed from the facility.

viii. **Mine Site – Construction and use of a new 5 ML diesel fuel tank and installation of two new 1.5 ML jet A fuel tanks –**

- a. It is requested that the existing bladders at the Mine Site cease to be used upon use of the new 5 ML diesel fuel tank and the jet A fuel tanks.
- b. Drawings associated with the new fuel tank facility at the Mine Site are “issued for 2012 work” and has Engineer stamp/signature, but no Permit to Practice signature. Phrases to the effect of “issued for construction” are not provided to note final drawings. Therefore these drawings should not be considered final drawings. As per the NWB Guide 4 – Completing and Submitting a Water Licence Application for a New Licence, it is recommended that approval should not proceed until “design drawings and reports requiring the application of engineering principles” are submitted. **It is recommended that final drawings for construction, signed and stamped by a qualified engineer, are issued to the NWB for approval, and as-built drawings, also signed and stamped by a qualified engineer, are submitted to the NWB post construction.**
- c. The 2012 Work Plan states installation of two 1.5 ML jet A fuel tanks; however the cover letter states construction and use of 1 x 1.5 ML jet fuel tank. The drawings suggest one tank to be installed, not two. **Clarification is requested in the number of jet A fuel tanks to be installed and used at the Mine Site.**

ix. **Mine Site – Advance the waste rock characterization program** – There is limited information presented in the water licence application on the context of the waste rock characterization program. A reference to the discussion at the Iqaluit Technical Meetings is provided. This reference alone without additional details of the program with submission with the water licence application is insufficient to assess potential impacts, water use, and waste disposal. It is unclear if the waste rock characterization program will require on-site activities, or primarily off-site activities



