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Department of Environment

Ministère de l'Environnement

File No. NWB2PEL/TR/I1

February 6, 2006

Mr. Richard Dwyer  
Licensing Trainee  
Nunavut Water Board  
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Gjoa Haven, NU  
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**Via E-mail to:**  
**licensing@nwb.nunavut.ca**

**RE: BHP Billiton Amaruk Project A&R Plan**

Dear Mr. Dwyer,

The Department of Environment (DOE) thanks Nunavut Water Board for the opportunity to review the Amaruk project application for a water license. Information from both the A&R and the Spill Plan, dated Dec.9<sup>th</sup>/ 2005, were reviewed.

**General comments:**

There is some information missing from the A&R plan. The plan notes certain information is located in Appendices, however these are not included. Additionally, previous comments provided by DOE on BHP's Spill Contingency Plan (September 21<sup>st</sup>, 2005) have not been incorporated into the newly revised plan.

- The description of the facility should define the project boundaries and give specific coordinates for the camp.
- The Environmental Protection Service (EPS) of the DOE monitors the movement of hazardous waste, from the generator, carrier to the final disposal, 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 spill plan.
- A description of the amount of contaminants normally stored on site should be included in the plan. This includes chemical names, volumes or weights of the contaminants.
- A description of the training provided to employees to respond to a spill should be included in the plan as well. A sound training program is necessary when dealing with an emergency situation.



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