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Department of Environment

Ministère de l'Environnement

Feb. 14, 06

Richard Dwyer
Licensing Trainee
Nunavut Water Board

via Email to: licensing@nwb.nunavut.ca

**RE: NWB2RBP – ROCHE BAY MAGNETITE EXPLORATORY DRILLING
WATER LICENSE APPLICATION**

Dear Richard:

The Department of Environment (DOE) has reviewed the water license application from Roche Bay Plc. for conducting an iron ore exploratory drilling near Roche Bay, 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*, the DOE has the following comments to make:

- A description of the site including the location, size and storage capacity is required as this is important for people who are unfamiliar with the area. The site description submitted is not sufficient.
- The site map submitted is not clear and not detailed enough. A site map is intended to illustrate the facility relationship to other areas that may be affected by a spill. The map should be large enough to include site location, nearby buildings, roads, culverts, drainage patterns, and any nearby bodies of water.
- The description of fuel storage method is not sufficient. To prevent a spill, fuel stored in drums should be located in a natural depression in a minimum distance of 90 feet from all streams, preferably in an area of low permeability. All fuel storage containers should be situated in a manner that allows easy access and the removal of containers in the event of spills. Large fuel caches in excess of 20 drums should be inspected daily.

- The clean-up and disposal procedures in the case of a spill are not sufficient. A detailed procedure of containment and clean-up techniques is required. In addition, a disposal procedure with approved disposal locations is necessary in the case of a spill.
- The DOE, Environmental Protection Service (EPS) monitors the movement of hazardous wastes, 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 spill plan.

2. ABANDONMENT & RESTORATION PLAN

An Abandonment & Restoration (A&R) Plan is required to be submitted along with other documents; however, there is no mention of a detailed plan in the application. Based on the DOE's *Environmental Guideline for Site Remediation*, the plan should be elaborated to include the following details: site description, contact information, the disposal and the removal of fuel/chemicals, the disposal of contaminated wastes and camp garbage, and finally the restoration of the project site and the camp site.

We thank NWB for giving us the opportunity to review and provide comments on the Roche Bay Plc's water license application near Roche Bay. Please contact us if you have any further questions or comments.

Yours sincerely,

Original signed by

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