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Department of Environment

Ministère de l'Environnement

Mar. 7, 2008

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board

via Email to: licensing@nunavutwaterboard.org

RE: N WB FILE # 2BE-RBP (AMENDMENT) – ADVANCED EXPLORATIONS INC. – ROCHE BAY ADVANCED IRON ORE EXPLORATION PROJECT

Dear Ms. Beaulieu:

The Government of Nunavut, Department of Environment (DOE) has reviewed an amendment water license application for the Roche Bay project from Advanced Explorations Inc. (proponent) for advanced exploration of iron ore locating west of Hall Beach. Based on DOE's legislative mandate under the *Environmental Protection Act*, we have the following comments to make regarding spill contingency planning and incineration of wastes.

A. SPILL CONTINGENCY PLAN

Based on DOE *Spill Contingency Planning and Reporting Regulations* and *A Guide to the Spill Contingency Planning and Reporting Regulations*, we have the following comment to make:

- It is unclear the capacity of the secondary containment. It is advised the containment will be capable to handle 110 % of the total fuel (i.e., up to 1 million liters potentially); this is advised in the case of worst case spill scenarios.

B. INCINERATION

The Government of Nunavut is signatory to *Canada-Wide Standards for Dioxins and Furans*, and the *Canada-Wide Standards for Mercury Emissions*. We therefore request the proponent ensures incineration emissions comply with the standards by implementing the following recommendations.

Large camps of over 50 people such as the one for this project shall apply appropriate technologies to ensure complete combustion of wastes, and the use of a dual chamber, controlled-air flow incinerator is recommended. Installation of an incineration device capable of meeting the emission limits established under

these standards is required. Compliance with the standards shall be demonstrated with an initial stack test upon commission of the incinerator at site, the results of which shall be submitted to relevant regulators such as DOE. During the course of operations, the proponent shall make determined efforts to achieve compliance with the standards. Determined efforts shall include but not be limited to appropriate record management, including maintenance reports, operator training logs, and the submission of an annual report that outlines the efforts made to achieve compliance with the standards.

DOE thanks NWB for giving us the opportunity to review and provide comments on the Roche Bay amendment water license application. Please contact us if you have any questions or comments.

Yours sincerely,

Original signed by

Helen Yeh
Environmental Assessment Coordinator
Department of Environment
Government of Nunavut