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Department of Environment

Ministère de l'Environnement

August 11, 2008

Phyllis Beaulieu Manager of Licensing Nunavut Water Board

via Email to: licensingadmin@nunavutwaterboard.org

RE: NWB FILE # 2BE-RBP0608 – Advanced Explorations Inc. – Roche Bay Magnetite Exploration Project

Dear Ms. Beaulieu:

The Government of Nunavut, Department of Environment (DOE) has reviewed the water license renewal application from Advanced Explorations Inc. for the Roche Bay Magnetite Exploration project and camp operation, and has the following comments and recommendations to make based on the *Environmental Protection Act* regarding spill contingency and abandonment & restoration.

## 1. Spill Contingency Plan

DOE requests that the Proponent update the following telephone and fax numbers found in *Appendix D: Additional Contact Information*:

Government of Nunavut Environmental Protection Manager Pollution Control and Air Quality Tel (867) – 975 – 7748 Fax (867) – 975 – 7735.

### Fuel Storage

All fuel storage containers should be situated in a manner that allows easy access and removal of containers in the event of leaks or spills. Large fuel caches in excess of 20 drums should be inspected daily.

#### 2. Abandonment & Restoration Plan

# Incineration

The Government of Nunavut is signatory to the *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





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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

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