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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI

NWB1ULU0008

March 5, 2001

Dave Hohnstein
Environmental Coordinator
Echo Bay Mines Ltd.
9818 International Airport
Edmonton, AB T5J 2T2

Re: Conditions Applying to Spill Prevention and Contingency Planning

The Nunavut Water Board acknowledges receipt on March 1, 2001 of your letter dated February 19, 2001 regarding the requirement for a Spill Contingency Plan that needs to be submitted to the Board for approval.

Part E, Item 1 of the licence states "The Licensee shall submit to the Board for approval sixty (60) days following the issuance of this Licence, a Spill Contingency Plan." This means that a Spill Contingency Plan shall be submitted within 60 days of the issuance of NWB1ULU0008 and this requirement is separate from any other notifications required in the licence. This requirement is also supported in the "Ulu Licence Renewal 2000" Decision.

If Echo Bay Mines Ltd. wishes to see any changes to this wording, an amendment needs to be filed with all proper justification.

With regards to Part D, Item 7,8, and 11, and Part H, Item 1 the wording is intended in the following manner, "The Licensee shall submit to the Board for approval, *within* at least sixty (60) days *following* notification to the Board by the Licensee that operation at the site will be resume, ...". This would be the same wording as what was found in Part C Item 4.

Part D Item 9 would indicate that the inspection is to be carried out annually *after* notification.

Part D Item 10 is intended to indicate that the licensee shall submit the plan to the Board for approval, within 2 months of operations on site resuming. The commas that I've inserted help give clarity to this term.

Part D Item 19 indicates that the Sludge Disposal Plan needs to be submitted prior to any deposit of waste.

Schedule I – Surveillance Network Program- becomes effective at the time when the Board receives notification that operations will resume.

You also indicated concern that there doesn't seem to be any indication within the Licence as to the required notification to implement the necessary sections of the Licence. By this concern, I assume that you are referring to the notification period for change in operations. You are correct, the licence doesn't specify when notification needs to be made, but does indicate that this needs to be prior to any change in operations.

I hope that the above comments help clarify the terms and conditions of the licence.

Sincerely,

Rita Becker
Licensing Administrator

cc. Greg Cook, DIAND
Paul Smith, DIAND
Paula Pacholek, EC
Chris Nichols, DSD
Gladys Joudrey, NIRB