From: David Hohnstein [Tech2@nwb.nunavut.ca]

Sent: Friday, September 09, 2005 5:21 PM

To: Phyllis Beaulieu

Subject: Fw: NWB4EUR Renewal

Phyllis, FYI and files,

this information was passed on to me directly by Mr. Domijan, of PWGSC

Thanks,

dh

----- Original Message ----From: Edward Domijan
To: Tech2@nwb.nunavut.ca

Cc: Michael Brownlee

Sent: Friday, September 09, 2005 1:57 PM

Subject: FW: NWB4EUR Renewal

Good afternoon David.

I was trying to follow-up on the issues you raised in your email of August 12 to Michael Brownlee (see below) of our office. I believe that some of your questions have been dealt with and others may still be outstanding, so I hope I will be able to fill in the remaining blanks for the Environment Canada application and hopefully move things forward towards approval and issuing the water license for Eureka.

There seems to be several issues relating to fuel storage that may be unresolved, namely the inclusion of details relating to the description of fuel storage facilities. From previous site investigations conducted by PWGSC at Eureka, I can include the following general excerpt:

"A. Tank Farm

The vast majority of fuel at Eureka is stored within the tank farm system at the northwest corner of the site which has a capacity of almost 1.3 million litres. The system was installed in 1992 and also incorporates three 90,000 litre temporary fuel bladders that remained in service from the previous fuel system. The fuel bladders are needed to ensure a two year storage capacity for the operations is reached. Fuel volumes are monitored regularly and entered monthly into a database tracking fuel use by the OIC. Up to 550,000 litres of fuel is delivered annually by sealift, typically in early September.

The ten fuel tanks are located within a bermed area and have several sumps built into the floor of the site. The fuel dispenser pump is outside of the bermed area and does not have any containment. A log book is kept at the pump and entries are checked against weekly tank dip tests and reconciled. No serious discrepancies have been noted since the start of using this method. The berm and pipelines are also regularly inspected.

B. Day Tanks

Five new Regal Enviro-Safe 9000 litre tanks were purchased and delivered to Eureka. They have recently been placed in service and will replace day tanks located around the site that are for emergency, back-up use only. The powerhouse day tank is checked daily while the garage and incinerator tanks are inspected weekly."

There is likely additional information regarding the tanks (individual tank sizes, etc.) that may be available from EC upon request. In addition, the requirement for accurate and up-to-date spill response planning was raised both by yourself and within the INAC review. I have obtained a hard copy of the "Oil Pollution Emergency Plan for Land Spills - Eureka" prepared by KLS Services and can fax it to your attention if required (it is approx. 34 pages long).

The issue of water usage and intake system operation has, I believe, been already dealt with in communication between Michael and yourself, but if you need further clarification feel free to ask.

Annual Surveillance Network Program reports prepared for adherence to the previous license have been located and are attached to this email (the 2005 report is still being prepared as we speak after sampling was conducted this past July)

Finally, I see a question was raised in the INAC review of the application relating to the development of a new landfill strategy and requesting submission of supporting documentation. Plans to develop either a new landfill or landfill management strategy have been placed on hold while construction of a new station facility nears completion. Demolition strategies for the old station (which will not be decided for at least 1-2 years) will drive plans for the landfill expansion/development and until that time waste will be handled in accordance with the Waste Management Strategy that has been in place since 1998.

I trust that answers your questions, however, if any further information or clarifications are required, feel free to contact me at (780) 497-3796.

Regards,

Ed

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Edward Domijan, P.Eng.

Environmental Services PWGSC - Western Region Office: (780) 497-3796 Cell: (780) 720-5893 Fax: (780) 497-3842 Telus Plaza North, 5th Floor 10025 Jasper Avenue

-----Original Message-----From: Michael Brownlee

Edmonton, AB T5J 1S6

Sent: Tuesday, September 06, 2005 9:40 AM

To: Edward Domijan

Subject: FW: NWB4EUR Renewal

Contact at NWB, to whom the file was handed off to, is David Hohnstein.

The original file handler was:

Phyllis Beaulieu Manager of Licensing Nunavut Water Board P.O. Box 119

Gjoa Haven, NU X0B 1J0 Phone: (867) 360-6338 Fax: (867) 360-6369

E-mail: licensing@nwb.nunavut.ca

-----Original Message-----

From: David Hohnstein [mailto:Tech2@nwb.nunavut.ca]

Sent: Friday, August 12, 2005 4:41 PM

To: Michael Brownlee **Cc:** Phyllis Beaulieu

Subject: NWB4EUR Renewal

Michael,

following up on our telephone conversation this a.m. and your concerns regarding the status of the renewal application, I would like to let you know that the application is being reviewed in its final stages and should be prepared for review by the Board.

I have quickly collected for you some of the concerns that have been noted and I would like to take this opportunity to draw your attention to the comments received by DIAND in their review of the application and the recommendations provided. These comments are available on the NWB ftp site at ftp://ftp.nunavut.ca/nwb/NWB4%20OTHER/NWB4EUR/

In addition to these comments, and in carrying out the final technical review of the application, it has been noted that according to the drawings/photos, there is at the site a fuel tank farm along with fuel bladders/piping associated with a sea-lift at the shore

terminal. These facilities are currently not included under the scope of the present licence (which they should have been). In conjunction with these facilities (and the ongoing operations of the overall facility), a Spill Contingeny Plan is required that addresses spill prevention as well as spill response for petroleum products and chemicals used at the site is required. The requirement for this Plan is referenced in Part G, Item 3a along with the Operations and Maintenance Plans. I am trying to confirm if a Plan as required under Part G, Item 1 was submitted.

I could not find in the application package a description of the fuel storage and handling facilities (procedures, capacities etc.), is there information available?

I understand from the questionnaire, that the water supply is recharged on an annual basis during July for 3-4 weeks. The rate of withdrawl from source is noted at 8m3/day and the total capacity of the storage facility is as 800m3. It is not really clear from the information, whether the volumes relate to the reservoir, the storage tanks, or both. The application indicates a water use from Station Creek to be between 5850 and 8775 cubic metres per season. Could you please clarify for me how this system operates and confirm the volumes that will be handled with the system.

The last item on my list of documents for review is the annual reports submitted during the licence term to identify progress at the site, changes to operations, review of discharge and water use data and updates to any plans that may be required. In reviewing our electronic data, I have only been able to locate an annual report for the year 2000 (submitted October 2001) and will have to complete a manual paper review of all documents received for the file. This will be completed early next week.

I thank you for your patience with respect to the above, and if you could assist by providing any/all of the information above, that would be greatly appreciated and assist in the process.

Regards,

David Hohnstein, C.E.T. Technical Advisor Mining Nunavut Water Board P.O. Box 119 Gjoa Haven, NU X0B 1J0

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