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## [Licensing] Amendment Application for Licence Number 3BC-EUR1116

Cloutier-Dussault, Jean-Philippe [Montreal] < Jean-Philippe. Cloutier-Dussault@ec.gc.ca> Mon, Aug 10, 2015 at 8:01 AM

To: brady.maccarl@nwb-oen.ca

Cc: licensing@nwb-oen.ca, "St-Jean,Martin [NCR]" <Martin.St-Jean@ec.gc.ca>, Laura.Barz@pwgsc-tpsgc.gc.ca, "Ste-Marie,Marc [Montreal]" <Marc.Ste-Marie@ec.gc.ca>, "Olson,Rebekah [NCR]" <Rebekah.Olson@ec.gc.ca>

Good morning Mr. MacCarl,

Please see below our answer to your questions in red.

Kind regards.

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De: Brady MacCarl [mailto:brady.maccarl@nwb-oen.ca]

Envoyé: Thursday, August 06, 2015 12:19 PM Eastern Standard Time

**À** : Ste-Marie, Marc [Montreal]

Cc: Licensing Department < licensing@nwb-oen.ca>

**Objet**: Amendment Application for Licence Number 3BC-EUR1116

Dear Mr. Ste-Marie:

The NWB has conducted a preliminary technical review of the Amendment Application submitted by EC to the NWB July 14, 2015, for the Eureka Station. After a thorough assessment of the Application, it remains unclear what aspects of the Licence EC is applying to amend.

The Application indicates that the following activities are planned:

- 1. Runway surface recapitalization project, lasting 3 years, which includes the establishment of a camp for contractors.
- 2. Construction of a new multi-purpose building near the actual main station building.

No project outline or design drawings are provided with the Application, and no indication is given about how these projects will affect water and waste management. Projects drawings will be made available to NWB on request. These projects will not affect water and waste management, only volumes as explained below.

The Application states that Water use is expected to increase to 5.6 m3/day in 2016; yet this is still well within the 10,000 m3/year currently allowed by the licence. In addition to the topic of water volume, will the refurbishing of the runway and the operation of the camp require any irregular—ie. non-domestic—uses of water, such as use for dust suppression or compacting, and if so, where will the water be sourced? The projects will not require irregular uses of water. They will only increase the amount of domestic water used by contractors on site. The source of water remains unchanged.

The Application also states—in Block 15--that changes to quantities of waste are expected, but no clarification is provided. Will new types of waste—hazardous or non-hazardous—be generated as a result of the activities? How will these waste types be managed? For example, will the domestic waste for the camp be deposited at Eureka's approval disposal facilities, or instead at disposal facilities (such as latrine pits) on-site at the new camp? The types of waste generated remain unchanged. Extra domestic waste produced by the camp will be trucked to Eureka's approved disposal facilities.

I would appreciate clarification on the changes to water use (volume, source, intakes, etc) and waste disposal (volumes and types) that are expected as a result of these activities. If no changes to water use, waste disposal or the scope of the licence are expected, an amendment to the licence may not be required. Water use remain unchanged. Only quantities will be increased slightly. Source, intake and waste disposal remain unchanged.

To make this determination, however, the onus lies on the Licensee to provide detailed information about the project, and indicate how the project will or will not affect water use or waste disposal.

Lastly, all changes to activities and infrastructure on-site should be reflected in revisions to a Licensee's Management

Plans (E.g. Spill Contingency, Operation and Maintenance, Abandonment and Reclamation), which should be submitted with the Annual Reports, for approval from the Board.

Please contact me with any questions you may have.

Regards,



## Brady MacCarl, MSc->5△∩ Lbbsc

Technical Advisor- Conseiller Technique Λンダ%ω56ンでんσ%よび Δbペ56∩- Piluaqnaqtuliginiqmun Ikayuqti

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