

MEMO

To: File
From: Larry Connell
Subject: Regulation to Control Sulphur Dioxide Emissions from the Giant Roaster Stack
Date: July 16, 1997

On July 15, 1997 Emery Paquin, Director of the Environmental Protection Branch of the Northwest Territories Department of Renewable Resources met with Royal Oak to discuss the status of proposed regulations under the Northwest Territories Environmental Protection Act to control the discharge of sulphur dioxide from the Giant Mine roaster stack. Present at the meeting were Im Acton, Larry Connell and Stephen Schultz for Royal Oak and Emery Paquin for the GNWT. The meeting was held at the request of Emery Paquin at the Explorer Hotel coffee shop at approximately 5:30 PM. The main items discussed are summarized as follows:

- a) The GNWT plans to promulgate the revised gold roaster regulation before the end of 1997. The regulation is currently being amended to reflect public input but the basic requirements of the regulation will not significantly vary from the previous draft. The regulation would call for a 90% reduction in the emission of sulphur dioxide by the end of a ten year period. It would require interim measures to be taken by Royal Oak including continuous emissions monitoring and some action to reduce ambient concentrations of sulphur dioxide. The interim measures would be required within 12 months of promulgation of the regulation.
- b) The GNWT feels that there has been too much delay in bringing to closure the issue of reducing sulphur dioxide emissions from the Giant roaster. The Government feels that it is the time for action.
- c) The GNWT feels that it would be sensible to deal with the issue of reducing both sulphur dioxide and arsenic emissions from the roaster simultaneously. Consequently it is willing to enter into a three party negotiation involving Royal Oak, the GNWT and Environment Canada that would lead to a formal agreement that sets out performance targets and an implementation timetable for the reduction of both arsenic and sulphur dioxide emissions from the Giant roaster stack.
- d) The GNWT has indicated that it is now up to Royal Oak to signify whether it is interested in pursuing a negotiated route by making a formal proposal to both the GNWT and Environment Canada. The GNWT is determined in any case to proceed with promulgation of their regulation and would have to see significant progress towards an acceptable agreement completed before the end of 1997 to make them consider any change to their planned course of action.

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- e) The GNWT has received legal opinion indicating that jurisdiction over all aspects related to the control and regulation of the underground storage of arsenic trioxide at the Giant mine lies with the Federal Government, specifically with the Northwest Territories water board.