

MEMORANDUM

To: Sadek El-Alfy
cc: Dave Anthony
From: Larry Connell
Date: August 25, 1995
Subject: NWT Renewable Resources - Regulation of Gold Roaster Emissions

I had a phone meeting with Emery Paquin, Director of the Environmental Protection Division of the NWT Department of Renewable Resources on Friday August 25th at 10:00AM. He informed me that the NWT Minister of Renewable Resources had given direction for his department to draft regulations designed to limit sulphur dioxide emissions from gold roasting plants within the NWT. (The Department of NWT Renewable Resources classifies the pressure oxidation plant at the Miramar Con Mine as a gold roasting plant). These draft regulations are to be released for public comment some time in late September of 1995. The regulation will establish a quantitative limit on the amount of sulphur dioxide that can be released to the environment over some unit of time. He is not able to tell us what at what level the regulation will be set, however it will be below the current peak emission rate at the Giant mine.

He informed me that the Minister is conscious of the economic benefits derived to Yellowknife by the continued operation of the Giant mine. This regulation is not aimed at forcing the Giant mine to cease operation. However the government feels that some form of regulation is required to safe guard the quality of air and the environment in the Yellowknife area.

The regulation will set an allowable emission rate but will not provide any suggested direction or influence over how the reductions are achieved by the company in complying with the regulation.

Mr. Paquin was not able to predict the timetable for implementation of the new regulation. The regulation will not address arsenic or arsenic trioxide emissions. The NWT government will leave the regulation of arsenic and its compounds to the Federal government under the Canadian Environmental Protection Act (CEPA). Arsenic is being

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considered for inclusion as a dedicated substance under CEPA by a federal standing committee.

Mr. Paquin advised me that it would be in Royal Oak's best interest to continue with the studies currently underway into:

- Installation of continuous sulphur dioxide emission monitoring equipment on the Giant roaster stack.
- An engineering evaluation of changes to roaster stack height, diameter, and temperature to improve off gas dispersion.
- Additional stack off gas dispersion modelling.

cc: Dave Anthony
John Stard