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Department of Environment

Ministère de l'Environnement

May 3, 07

Richard Dwyer
Licensing Trainee
Nunavut Water Board

via Email to: licensingtrainee@nunavutwaterboard.org

**RE: NWB FILE # 1BR-LOR – INDIAN AND NORTHERN AFFAIRS CANADA –
CAPE CHRISTIAN SITE REMEDIATION PROJECT**

Dear Mr. Dwyer:

The Government of Nunavut, Department of Environment (DOE) has reviewed the water license application from the Indian and Northern Affairs Canada for the Cape Christian site remediation project, located approximately 16 km northeast of Clyde River. The DOE believes the project will not result in significant adverse effects although the potential for negative environmental impacts exists. Based on the *Environmental Protection Act* and *Wildlife Act*, the DOE has the following comments to make regarding spill contingency and air quality.

1. SPILL CONTINGENCY PLAN:

The DOE recognizes that the current spill plan is conceptual and that a site specific plan will be developed by a contractor. We therefore recommend that the contractor refers to the following DOE regulation and guidelines to ensure the spill plan developed is adequate:

- *Spill Contingency Planning and Reporting Regulations*
- *Contingency Planning and Spill Reporting in Nunavut: a Guide to the New Regulations*

2. AIR QUALITY

It is noted that within the project there are plans to incinerate waste materials. The Government of Nunavut is a signatory to *Canada-wide Standards for Dioxins and Furans*, and the *Canada-Wide Standards for Mercury Emissions*. The project proposal stated that the camp will hold up to a maximum of 25 people, the DOE therefore recommends the following:

The proponent shall apply appropriate technologies to ensure complete combustion of wastes, and the use of a dual chamber, forced-air incinerator is recommended. In addition, the proponent is recommended to implement a comprehensive waste management strategy (especially waste segregation) to reduce and control the volumes of wastes produced, transported, and disposed of. Furthermore, emissions from incineration of hazardous wastes such as waste oil as proposed in the project proposal should comply with the Canada-Wide Standards, and the compliance should be demonstrated to regulators before operation.

The DOE thanks the NWB for giving us the opportunity to review and provide comments on the Cape Christian site remediation project. Please contact us if you have any further questions or comments.

Yours sincerely,

Original signed by

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