

$\Delta \nabla \cap C_{\text{L}}^{\text{b}} d^c$

Avatiliqiyiit

Department of Environment

Ministère de l'Environnement

File No. NWB1BR-RAD

April 3, 2006

Richard Dwyer
Licensing Trainee
Nunavut Water Board

Via E-mail to:

licensingtrainee@nwb.nunavut.ca]

RE: Radio Island Remediation Project

The Department of the Environment (DOE) thanks Nunavut Water Board for the opportunity to provide comments on INAC activities.

DOE's comments are restricted to wildlife issues. Resolution Island including Radio island has an extremely high density of polar bears during the open water season, as well as frequent visits during the ice-covered season. The Radio island site in particular is situated at the water line. There will be a constant stream of polar bear activity at this camp. Other camps in the area have had to evacuate frequently.

CAMP

DOE suggests a chain link fence compound for the living area. The helicopter pad should also be enclosed to avoid aircraft damage when the machine is parked. Access to water lakes, work sites, vehicles etc could be very dangerous in bad weather unless these areas are fenced as well.

Bear deterrents (cracker shells, thunder flashes and rubber bullets) should be on site. The proponent should consider the use of electric fencing within the camp design, especially around sleeping quarters.

Proper food handling and garbage disposal procedures should be followed to reduce the likelihood that bears will be attracted to the operation.

ACTIVITIES

There should be several bear monitors during all activities. Monitors should likely have immobilization and removal training. This area can have heavy fog causing zero visibility for weeks. Helicopters may not be able to fly in or out of the base camps for weeks at a time, so the camp must anticipate dealing with emergency medical situations.



General Comments:

DOE recommends that the Abandonment and Restoration plan be updated by the proponent to consolidate all of the information scattered through several documents;

- Site restoration plan
- Abandonment and Restoration Plan
- NWB supplementary information requests to Tri- Origin Exploration Ltd.
- Project Summary

There is some information missing from the document, including:

I.Introduction:

A brief description of the site including the location, the dates for starting and abandonment, the number of workers on site and the approximate areas being disturbed.

II. Hazardous Materials:

Please identify and prepare an inventory of all hazardous materials on site. Hazardous materials stored on-site should be marked so they will be visible under all conditions, in all seasons. This recommendation is intended to help prevent possible injuries to camp personnel and/or damage to the containers. Unless otherwise specified by the land use inspector or license -issuing agency, all hazardous materials should be removed from the site upon completion of the activity. The proponent is referred to DoE's *Environmental Guideline for the General Management of Hazardous Waste*.

III. Fuel Storage

To prevent spreading in the event of a spill, fuel stored in drums should be located, whenever practical, in a natural depression a minimum distance of 90 feet from all streams, preferably in an area of low permeability. All fuel storage containers should be situated in a manner that allows easy access and removal of containers in the event of leaks or spills. MSDS sheets should be provided for each fuel and be posted in a central location; accessible by all camp personnel. This information will provide the hazards of each fuel (i.e. flammability) and the methods of dealing with the fuel in the event of a spill. Large fuel caches in excess of 20 drums should be inspected daily.

IV. Chemical Storage

All chemicals should be stored in a safe and chemically-compatible manner a minimum of 90 feet from all bodies of water. The applicant should be required to remove unused chemicals for reuse or disposal to an approved site using methods approved by the

Land Use Inspector. Material safety data sheets (MSDS) should be provided for each chemical and be posted in a central location; accessible by all camp personnel. Camp personnel should be conversant in the handling of these chemicals as well as able to deal with any accidents or spills.

V. Spill Contingency Plan

The plan should include a list of available spill response equipment and their locations and the names of trained personnel who will be on-site and available in the case of a spill. Additionally, the company name, number, address including the president, site supervisor, environmental supervisor and emergency contacts must all be included.

The proponent is referred to DoE's *Spill Contingency Planning and Reporting Regulations* and *A Guide to the Spill Contingency Planning and Reporting Regulations*.

VI. Final Inspections

The A&R plan lists environmental consultants to be consulted as necessary. Please provide specific consulting organization or individuals including contacts for final inspections. Pictures need to be taken before and after reclamation and soil samples after reclamation.

Acts, Regulations and Environmental Guidelines

The proponent is referred to the Government of Nunavut's acts, regulations and environmental guidelines:

The Environmental Protection, Department of Environment derives its regulatory authority and operational mandate from the Government of Nunavut's *Environmental Protection Act* (EPA). A number of regulations and guidelines have been developed and adopted under the EPA; some, or all of which might prove to be of assistance to a proponent in planning their activities. The guidelines are listed here for the information of the proponent and are available to the public at any DoE's office in Nunavut or from DoE's Headquarters in Iqaluit.

Acts and Regulations

Environmental Protection Act

Environmental Protection Act: Simplified Summary

Environmental Rights Act

ᐃᑦᑎᑦᑎᐱᐅᑦ

Avatiligiyiit

Department of Environment

Ministère de l'Environnement

Spill Planning and Reporting Regulations

A Guide to Spill Contingency Planning & Reporting

Asphalt Paving Industry Emission Regulations

Pesticide Act

Pesticide Regulations

Used Oil and Waste Fuel Management Regulations (undergoing completion; proposed for June 2000)

Environmental Guidelines

Dust Suppression

General Management of Hazardous Waste

Industrial Projects on Commissioner's Lands

Industrial Waste Discharges

Ozone Depleting Substances

Site Remediation

Sulphur Dioxide & Suspended Particulates

Waste Antifreeze

Waste Asbestos

Waste Batteries

Waste Paint

Waste Solvents

Once again the Department of Environment thanks Nunavut Water Board for the opportunity to comment on this project proposal.

Sincerely,

Michael Mifflin
Coordinator Land Use Planning
Environmental Protection Services
Department of Environment
Government of Nunavut
(867)975-7737



Avatiligiyiit

Ministère de l'Environnement