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Department of Environment

Ministère de l'Environnement

May 1, 07

Richard Dwyer
Licensing Trainee
Nunavut Water Board

via Email to: licensingtrainee@nunavutwaterboard.org

**RE: NWB FILE # 1BR-ROB – INDIAN AND NORTHERN AFFAIRS CANADA –
ROBERTS BAY 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 Roberts Bay project for remediation of the Roberts Bay and Ida Bay. 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*, 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 the contractor. We therefore recommend that the contractor refers to the following DOE regulation and guideline to ensure the 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 application states that the camp will hold up to a maximum of 20 people, the DOE therefore recommends the following:

Medium Camps (10-50 people)

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 the regulators before operation.

The DOE thanks the NWB for giving us the opportunity to review and provide comments on the Roberts Bay water license application. Please contact us if you have any further questions or comments.

Yours sincerely,

Original signed by

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