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## Avatiligiyyit

Department of Environment

Ministère de l'Environnement

March 20, 2006

Richard Dwyer  
Licensing Trainee  
Nunavut Water Board

**via Email to:** [licensingtrainee@nwb.nunavut.ca](mailto:licensingtrainee@nwb.nunavut.ca)

**RE: 2BE-MIP – Stornoway Diamond Corporation MIP project**

Dear Richard:

The Department of Environment (DOE) has reviewed the water license application from Stornoway Diamond Corporation for exploration activities on Baffin Island west of Amadjuak Lake, and has the following comments and recommendations.

## CAMP OPERATIONS

As a rule, the establishment and operation of the camp shall minimize surface disturbance and environmental impacts.

## ICE DRILLING

It is noted that the proponent intends to conduct on-ice drilling. Fuel should not be stored on the ice but at an on-shore cache a minimum of 100 meters from the high water mark. A limited supply of fuel can be temporarily brought on to the ice to support the drill; however, there must be secondary containment system to prevent spillages.

All drill operations should be 'closed loop' recycling systems with no discharge to the ice or water. If mixing tanks are to be used they are to be placed on an impervious liner.

## HAZARDOUS MATERIALS

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. , 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*.

A Waste Manifest must accompany all movements of hazardous wastes, and all parties must register with the EPS.

### **SPILL CONTINGENCY PLAN:**

Based on the Government of Nunavut *Spill Contingency Planning and Reporting Regulations* and *A Guide to the Spill Contingency Planning and Reporting Regulations*, the DOE has the following comments to make:

- A site map is not contained, although there are commitments to submit one at a later date. A site map is intended to illustrate the facility relationship to other areas that may be affected by a spill. The map should be large enough to include site location, nearby buildings, roads, culverts, drainage patterns, and any nearby bodies of water.
- The DOE, Environmental Protection Service (EPS) monitors the movement of hazardous wastes, from generators, carriers to receivers, through a tracking document (Waste Manifest). A Waste Manifest must accompany all movements, and all parties must register with the EPS. There is no mention of this procedure in the spill plan.

It is noted that the spill report form in the Spill Contingency Plan in the NWT version. The Nunavut spill report form is attached in both English and Inuktitut for inclusion.

### **ABANDONMENT & RESTORATION PLAN**

- A site map should be included within the A&R plan, and it should indicate the locations of fuel and chemical storage facilities, nearby buildings, drill sites and UTM coordinates with respect to nearby communities.
- Soil contaminated by fuel near storage tanks should be treated on site or removed to an approved disposal facility and replaced with new soil. There is no mention of this procedure in the plan.

### **WILDLIFE**

#### Caribou



The area is likely to contain substantial numbers of caribou year round, including during the sensitive calving and post-calving periods. DOE therefore recommends the inclusion of the following caribou protection measures.

1. (a) The Permittee shall not, without approval, conduct any activity between May 15 and July 15 within the North Baffin region.  
  
(b) A Permittee may, upon approval by the Land Use Inspector (DIAND) or Land Manager (QIA), operate within the North Baffin region beyond the May 15 deadline set out in 1(a), provided that when caribou cows are approaching the area of operation, the Permittee will implement 1 (c).  
  
(c) During the period of May 15 to July 15, the Permittee will suspend all operations, particularly blasting, overflights by aircraft at any altitude of less than 300 metres above ground level, and the use of snowmobiles and ATV's (all-terrain vehicles) outside the immediate vicinity of the camp, and all personnel will remain quietly in camp or, upon advice from the Land Use Inspector (DIAND) or Land Manager (QIA), the Permittee will remove all personnel from the site who are not required for the maintenance and protection of the camp facilities and equipment.  
  
(d) The Permittee may resume activities prior to July 15 if the caribou cows have ceased to use the area for calving or post-calving.
2. (a) During migration of caribou, the Permittee shall not locate and operation so as to block or cause substantial diversion to migrating caribou.  
  
(b) The Permittee shall cease activities that may interfere with migration, such as airborne geophysics surveys or movement of equipment, until the migrating caribou have passed.
3. The Permittee shall not construct any camp, cache any fuel or conduct blasting within 10 km, or conduct any diamond drilling operation within 5 km, of any "Designated Crossing" as outlined on the map annexed to a Land Use Permit.
4. Concentrations of caribou should be avoided by low-level aircraft at all times.

#### Raptor Nesting Areas

The project area includes known raptor nesting sites and other areas where it is likely that raptors nest. To minimize negative impacts of this operation on raptors, the applicant should be advised to:

(a) take care not to disturb nesting raptors from 15 April to 1 September by staying at least 1.5 km away from them when in transit by aircraft, and to avoid approaching them closely while on foot, and

(b) Contact the Regional Biologist in Arviat ( 867 857-2828) to identify areas which should be avoided.

"If raptors are disturbed during the nesting period, they often abandon the eggs or young. Loud, repeated noises and close approach by humans on foot are particularly harmful."

Once again we thank NWB for the opportunity to comment on this license application.

Yours sincerely,

***Original signed by***

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