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Department of Environment

Ministère de l'Environnement

August 11, 2008

Phyllis Beaulieu  
Manager of Licensing  
Nunavut Water Board

**via Email to:** [licensingadmin@nunavutwaterboard.org](mailto:licensingadmin@nunavutwaterboard.org)

**RE: NWB FILE # 2BE-MSX0712 – Silvermet Inc. – Silvermet Lake/Muskox Project**

Dear Ms. Beaulieu:

The Government of Nunavut, Department of Environment (DOE) has reviewed the water license amendment application from Aurora Geosciences Ltd. for the Silvermet Lake/Muskox exploration project and camp operation, and has the following comments and recommendations to make based on the *Environmental Protection Act* regarding spill contingency and waste management.

## 1. SPILL CONTINGENCY PLANNING

- Please update the Additional Information and Assistance list in the Spill Contingency Plan to include the following telephone numbers for the GN-Department of Environment (867) 975-7700 and the Manager Pollution Control and Air Quality (867) 975-7748.
- The NWT-Nunavut spill report form has been updated, and can be obtained from DOE website (<http://www.gov.nu.ca/env/applications.shtml>). This form should be included in the spill plan, and proponents are required to use this form for reporting to the Spill Line in the case of spills. Additionally, the proponent is advised to enter spill information electronically in the form in the case of spills so the information is legible to regulators inspecting the spill.
- The DOE monitors the movement of hazardous wastes, from generators, carriers to receivers of the wastes, through the use of a tracking document known as a Waste Manifest. A Waste Manifest must accompany all movements, and all parties must register with DOE by contacting Robert Eno at (867)975-7748 or [reno@gov.nu.ca](mailto:reno@gov.nu.ca).
- A site map that is intended to illustrate the facilities relationship to other areas that may be affected by the spill should be included. The map should be to scale and be large enough to include the location of your facility, drainage patters, and any nearby bodies of water.
- A description of the type and amount of fuels and chemicals normally stored on site should be provided in the Spill Contingency Plan.
- All chemicals should be stored in a safe and chemically-compatible manner a minimum of 90 feet from all bodies of water.
- To prevent spreading in the event of a spill, fuel stored in drums should be located a minimum distance of 90 feet from all water bodies, preferably in an area of low permeability

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## 2. WASTE MANAGEMENT PLAN

## Air Quality

The Government of Nunavut is signatory to *Canada-Wide Standards (CWS) for Dioxins and Furans*, and *Canada-Wide Standards for Mercury Emissions*. The DOE therefore requests the proponent ensures incineration emissions comply with the CWS by implementing the following recommendations.

For a camp of 10 to 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. The proponent shall make determined efforts to achieve compliance with the CWS. Efforts should include the implementation of a comprehensive waste management strategy (especially waste segregation) that is designed to reduce and control the volumes of wastes produced, transported, and disposed of. The Waste Management Strategy should consider and include:

- Purchasing policies that focus on reduced packaging,
- On-site diversion and segregation programs (i.e. the separation of non-food waste items suitable for storage and subsequent transport and disposal or recycling).
- If incineration is required, ensure diligent operation and maintenance of the incineration device and provide appropriate training to the personnel operating and maintaining the incinerator.

Waste wood treated with preservatives such as creosote, pentachlorophenol or heavy metal solutions should not be burned. Additionally, plastics, electrical wire, asbestos and building demolition wastes (except clean wood) are wastes likely to produce dioxins and furans when burned and should be excluded from incineration. Furthermore, hazardous wastes should not be managed through burning or incineration.

The GN thanks NWB for the opportunity to provide comments on Aurora Geosciences's water license amendment application. Please contact us if you have further questions.

Yours sincerely,

**Original signed by**

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