Environment Canada Environnement Canada

Environmental Protection Operations
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Nunavut Water Board
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Re: NWB 2BE-MSX0712 - Amendment - Silvermet Inc - Muskox Project

On behalf of Environment Canada (EC), I have reviewed the information submitted with the above-mentioned application. The following specialist advice has been provided pursuant to Environment Canada's mandated responsibilities for the enforcement of the *Canadian Environmental Protection Act*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

Comments and recommendations previously submitted by Environment Canada for NWB 2007N-2BE-MSX and NIRB 07EN017, regarding Silvermet's Muskox Project in the McGregor Lake area, would apply to the amendment.

Comments and Recommendations:

General

1. The proponent shall ensure that any chemicals, fuel or wastes associated with the proposed land use permit application do not enter waters frequented by fish. It is a requirement of Section 36(3) of the ***Fisheries Act*** that all effluent discharged into water frequented by fish, be non-deleterious.
2. One of the main reasons for the 30m prohibition is to protect the near shore areas of water bodies. To this end, any work that occurs in that area must be done such that surface erosion does not occur, and there is no disturbance to surficial materials or permafrost.
3. EC recommends that the proponent be prepared in the event that sedimentation may occur, and have materials available with which to construct a silt fence or other barrier to prevent solids from reaching the lake.

Oil and Hazardous Material Spill Contingency Plan

4. The plan should provide a clear response plan and overview of the steps to be taken to address spills of each type of hazardous materials on site (i.e., diesel, Jet B, propane, etc…) on various types of terrain (i.e. snow, tundra, rock, ice, open water, etc…).
5. The location of spill kits on site and their contents are not indicated. Environment Canada recommends that the kit be located in an easily accessible and central location, and that this location and contents be identified in the Spill Contingency Plan.
6. The spill response plan should include a list of people/places that can be contacted to obtain spill response equipment not available on site (i.e. skimmers for recovery of hydrocarbons on water).
7. The spill response plan should include maps of the camp layout, including the location of any fuel caches, sumps, and the location of spill kits on site.
8. The response plan should provide a reporting hierarchy that is to be followed in the event of a spill, including contact numbers and names for personnel. This reporting chart should be updated as staff changes occur.
9. The contact numbers in the Plan for Environment Canada's NWT/Nunavut 24-hour Duty Officer

should be updated to the following:

- Phone: 867-766-3737
- Fax: 867-873-8185

Waste Management Plan

10. The Waste Management Plan 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).
    - Recycling whenever possible
    - If incineration is required, ensure diligent operation and maintenance of the incineration device and ensure appropriate training is provided to the personnel operating and maintaining the incinerator.
        - The objective should be to ensure that only food waste and food-contaminated waste is burned (the use of paper, cardboard and clean wood as supplementary fuel is acceptable).
12. EC recommends that rather than using a 45 gal drum as proposed by the proponent, an approved incinerator be used on-site in order to ensure complete combustion and compliance with the *Canadian Environmental Protection Act* regulations. A variety of incineration devices are available and selection of the most appropriate will depend on considerations of technical and economical feasibility for each situation. Installation of an incineration device capable of meeting the emission limits established under the *Canada-wide Standards (CWS) for Dioxins and Furans* and the *CWS for Mercury Emissions* is required (both the Government of Canada and the Government of the Nunavut are signatories to these Standards and are required to implement them according to their respective jurisdictional responsibility). The proponent should review the incineration options available and provide justification for the selected device to the regulatory authority.
13. In addition to the type of waste already addressed in the plan, the disposal of non-combustible solids waste, greywater, drill water, sludge, bulky items/scrap metal and waste oil also need to be addressed in the plan.
14. Waste oil may contain metals and other contaminants. If waste oil is incinerated it should be burned in an approved waste oil burner and the waste oil should be tested for contaminants as required in the NWT under the *Used Oil and Waste Fuel Management Regulations.* Otherwise, the proponent shall ensure that waster oil, along with all noncombustible and hazardous wastes, receive proper treatment and disposal at an approved facility.
15. Used absorbent materials, oily or greasy rags, and equipment servicing wastes (such as used engine oil, antifreeze, hydraulic oil, lead acid batteries, brake fluid and other lubricants) should be safely stored and transported in sealed containers and safely transported to a facility that is authorized for the treatment and disposal of industrial hazardous wastes.

Environmental Protection Operations (EPO) should be notified of changes in the proposed or permitted activities associated with this application.

Please do not hesitate to contact me at (867) 669-4744 or ron.bujold@ec.gc.ca with any questions or comments.

Yours truly,

Ron Bujold
Environmental Assessment Technician

cc: Carey Ogilvie (Head, Assessment & Monitoring, EPO)

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Jane Fitzgerald (Environmental Assessment Coordinator, EPO)