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Department of Environment

Ministère de l'Environnement

July 18, 2008

Richard Dwyer
Manager of Licensing
Nunavut Water Board

***via Email to:* licensingadmin@nunavutwaterboard.org**

RE: NWB File # 2BE-YAV0507 – Savant Explorations Ltd. – Yava Exploration Project

Dear Mr. Dwyer:

The Government of Nunavut, Department of Environment (DOE) has reviewed the Yava assignment and amendment water license application from Savant Explorations Ltd. for conducting precious metal exploration and camp operation approximately 125 km SSE of Kingaok (Bathurst Inlet). Based on the *Environmental Protection Act*, DOE has the following comments to make regarding spill contingency, and abandonment & restoration.

A. SPILL CONTINGENCY PLAN

Based on DOE's *Spill Contingency Planning and Reporting Regulations*, and *Contingency Planning and Spill Reporting in Nunavut: a Guide to the New Regulations*, we recommend the following:

• The name, job title and **24 hour telephone number** for the persons responsible for activating the contingency plan. This ensures the employee discovering the spill can activate a response and provides a 24 hour point of contact for the authority investigating the spill.

• A **site map** that is intended to illustrate the facilities relationship to other areas that may be affected by the spill. The map should be to scale and be large enough to include the location of your facility, nearby buildings or facilities, roads, culverts, drainage patters, and any nearby bodies of water.

• A description of the **type and amount of chemicals** normally stored on site.

• Chemicals should be stored in a safe and chemically-compatible manner a minimum of 90 feet from all bodies of water. 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.

• 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. Additionally, 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.*

• Chemicals containing salts, which may attract wildlife to the site, should be stored so that they are inaccessible to wildlife.

• A more detailed description of the training provided to employees to respond to a spill. A sound training program is necessary when dealing with an emergency situation.

• An inventory and the location of response and clean up equipment available to implement the plan, should be discussed. This includes the Proponent's equipment (including spill kit inventory) as well as any to be used by another person/company responding to the spill on the Proponent's behalf.

• The DOE 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 at DOE with Robert Eno at reno@gov.nu.ca or (867) 975-7748.

• The NWT-Nunavut spill report form has been updated, and can be obtained from the Spill Line. The proponent is advised to enter spill information electronically in the form so the information is legible to regulators inspecting spills. This form should be included in the Spill Contingency Plan.

• The SCP does not outline any disposal/treatment techniques for contaminants (e.g. contaminated soils); however, states that "Store/transport recovered material and asses the proper method of disposal." The proponent should revise the Spill Contingency Plan to outline details including the following: disposal/treatment techniques, location of disposal sites approved to accept wastes, and means of storage prior to disposal. For further information, the proponent is referred to DOE's *Environmental Guideline for Site Remediation* and *A Guide to Spill Contingency Planning and Reporting.*

• The summary telephone list included in the Spill Contingency Plan should be update to include the following:

Government of Nunavut, Department of Environment, Manager Pollution Control and Air Quality (867) 975-7748.

B. ABANDONMENT AND RESTORATION

1. Contaminated Soils

Soil contaminated by fuel (e.g., soils under an old storage tank) should be treated on site or removed to an approved disposal site and replaced with new soil. Soils in the vicinity of fuel and/or chemical storage should be tested and disposed off if necessary.

2. Restoring Drill Holes and Sumps

Drill holes should be backfilled or capped at the end of project. The sumps should only be used for inert drilling fluids, not any other materials or substances. The sumps should be properly closed out at the end of a project.

3. Final Inspections

Final inspections of the entire site should be conducted by the proponent and lead agency to make sure that all areas of the site have been reclaimed as much as possible to its previous condition. Soil samples and pictures before and after the project would make this process easy on the proponent and leading agencies involved in determining areas of concern.

4. Incineration

The Government of Nunavut is a signatory to the *Canada-Wide Standards for Dioxins and Furans*, and *Canada-Wide Standards for Mercury Emissions*. For incineration of wastes, DOE therefore has the following comments to make regarding emissions from incineration. For a camp of greater than 10 but less than 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 Canada-wide Standards for dioxins and furans and the Canada-wide Standard for Mercury. 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 nonfood 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. Under no circumstance should hazardous wastes be managed through burning or incineration.

The DOE thanks NWB for the opportunity to provide comments on the project proposal from Commander Resources Ltd. Please contact us if you have further questions.

Yours sincerely,

Original signed by

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