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## Avatiligiyyit

Department of Environment

Ministère de l'Environnement

Nov. 6, 06

Phyllis Beaulieu  
Manager of Licensing  
Nunavut Water Board

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

**RE: NWB FILE# 3BC-TEH – TEHEK LAKE PROJECT WATER LICENSE APPLICATION**

Dear Ms. Beaulieu:

The Department of Environment (DOE) has reviewed the water license application from Nuna M&T Services Ltd. for a construction camp operation near Baker Lake Hamlet, and has the following comments and recommendations.

## 1. SPILL CONTINGENCY PLAN:

Based on the Government of Nunavut *Spill Contingency Planning and Reporting Regulations* and *Environmental Guideline for Contingency Planning and Spill Reporting in Nunavut*, DOE has the following comments to make:

- To prevent spreading in the event of a spill, fuel stored in drums should be located, whenever practical, in a natural depression a minimum distance of 90 feet from all streams, preferably in an area of low permeability.
- 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 including **fuel storage areas**, nearby buildings or facilities, roads, culverts, drainage patterns, and any nearby bodies of water.
- The spill plan should include an inventory and the location of response and clean-up equipment available to implement the plan. This includes your equipment as well as any to be used by another person responding to the spill on your behalf.

## **2. INCINERATION**

The Government of Nunavut is signatory to the Canada-Wide Standard (CWS) for dioxins and furans, and the Canada-Wide Standard to mercury; therefore, we advise the proponent follows recommendations below to ensure compliance with CWS for incineration. The recommendations have been divided based on the size of the camps from small, medium to large camps.

### **Small Camps (less than 10 people or less than 900 person days/yr)**

The proponent shall make determined efforts to achieve compliance with CWSs for dioxins and furans and CWS 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
- 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.

### **Medium Camps (10-50 people or greater than 900 but less than 4410 person days/yr)**

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 CWSs for dioxins and furans and CWS 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 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. Under no circumstance should hazardous wastes be managed through burning or incineration. The efforts made to achieve compliance shall be reported to the Nunavut Impact Review Board as part of the annual report.

**Large Camps (over 50 people or greater than 4410 person days/yr)**

The proponent shall apply appropriate technologies to ensure complete combustion of wastes, and the use of a dual chamber, controlled-air flow incinerator is recommended. Both the Government of Canada and the Government of the Nunavut are signatories to CWSs for dioxins and furans and CWS for mercury, and are required to implement them according to their respective jurisdictional responsibility. Installation of an incineration device capable of meeting the emission limits established under these standards is required. Compliance with the Standards shall be demonstrated with an initial stack test upon commission of the incinerator at site, the results of which shall be submitted to the Nunavut Impact Review Board, Environment Canada, and Government of Nunavut-Department of Environment. During the course of operations, the proponent shall make determined efforts to achieve compliance with CWSs for dioxins and furans and CWS for mercury. Determined efforts shall include but not be limited to appropriate record management, including maintenance reports, operator training logs, and the submission of an annual report that outlines the efforts made to achieve compliance with the Standards.

We thank NWB for giving us the opportunity to review and provide comments on the Nuna's water license application. Please contact me if you have any further questions or comments.

Yours sincerely,

***Original signed by***

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