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Department of Environment

Ministère de l'Environnement

September 18, 2008

Phyllis Beaulieu  
Manager of Licensing  
Nunavut Water Board

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

**RE: NWB FILE # 2BE-BLU0809 – Skybridge Development Corporation – Blue Caribou Gold Exploration Project**

Dear Ms. Beaulieu:

The Government of Nunavut, Department of Environment (DOE) has reviewed the water license amendment application from Skybridge Development Corporation for the Blue Caribou gold/copper/molybdenum exploration project, and has the following comments and recommendations to make based on the *Environmental Protection Act* regarding spill contingency and abandonment & restoration.

### **A. Spill Contingency Plan**

Based on the DOE *Spill Contingency Planning and Reporting Regulations*, *Contingency Planning and Spill Reporting in Nunavut: a Guide to the New Regulations*; and *Guideline for the General Management of Hazardous Waste in Nunavut*, DOE has the following comments and recommendations to make:

- The SCP does not outline any disposal/treatment techniques for contaminants (e.g. contaminated soils); however, states that Federal and Territorial regulatory agencies will be contacted in order to “identify appropriate disposal methods before disposing of contaminated material” (See sections 1.9.1.6, 1.9.2.3, and 1.9.4.5 of the SCP). The DOE advises the proponent that the role of the regulatory agencies is not to foreclose how the disposal is done, but to ensure that clean up and disposal/treatment occurs in an approved and authorized manner. The proponent should revise the Spill Contingency Plan to outline disposal/treatment techniques for contaminated material such as soils. These plans may include location of disposal sites approved to accept wastes, means of storage prior to disposal and other approvals required. The goal of the treatment and/or disposal of the contaminant is to ensure that there is no longer a threat to the environment. For further information, the proponent is referred to DoE’s *Environmental Guideline for Site Remediation* and *A Guide to Spill Contingency Planning and Reporting*.

## **B. Abandonment & Restoration Plan**

### 1. Drill Holes/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.
- If hydrocarbon based drill additives are used, the use of a filtration system aimed towards reduction of harmful substances to the environment is recommended. Drill additives such as rod grease and linseed soap should be safely stored in containers that have been specifically designed for the storage of hydrocarbons and safely transported to a facility that is authorized for the treatment and disposal of industrial wastes. The waste must be

stored in a manner that minimizes the risk of spills and further ensures that the container can be periodically inspected for leaks or potential leaks.

- Drilling additives shall not be used in connection with holes drilled through lake ice unless they are re-circulated or contained such that they do not enter the water, or demonstrated to be non-toxic.

## 2. Contaminated Soil

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.

### 3. Incineration

The proponent has indicated that most non-combustible wastes will be removed to Yellowknife, while combustible waste will be burned either onsite, or at the camp. 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 Emissions*. 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.

#### 4. 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.

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

Yours sincerely,

**Original signed by**

Froeydis Reinhart

