



Environmental Protection Operations  
5204 - 50<sup>th</sup> Avenue, Suite 301  
Yellowknife, NT X1A 1E2

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Our File 4703 001 083

Phyllis Beaulieu  
Manager of Licensing  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, NU X0B 1J0

licensing@nunavutwaterboard.org

**Re: NWB 2BE-BLU: Type "B" Water Licence Amendment – Name Change and Addition of Camp - Blue Caribou Project – Alyris Gold Corporation.**

Environment Canada's (EC's) contribution to your request for specialist advice is based on the mandated responsibilities for the enforcement of **Section 36(3)** of the *Fisheries Act*, the *Canadian Environmental Protection Act* (CEPA), the *Migratory Birds Convention Act* (MBCA) *Regulations* and the *Species at Risk Act* (SARA).

EC has reviewed the above noted amendment application submitted by the proponent to change the water licence holder from Alyris Gold Corporation to Skybridge Development Corporation, the parent company. The proponent would also like to establish a camp at the following co-ordinates: 65°14'18" Latitude: 106°36'07" Longitude. The camp will be known locally as the Sage Lake Camp.

EC does not have any issues with the amendment for the name change and the new camp. **Comments and recommendations submitted by EC for the initial Water Licence would still be applicable to the amendment.**

However the proponent states in the amendment application that they will be burning paper, sacking, tool wrapping, water bottles, tin cans, pop cans, etc., and that the final incinerated product will be sealed in drums and returned to Yellowknife for disposal at the local landfill. The proponent also mentions that the poly tubes used to transport sludge from on ice drilling will also be incinerated. EC is concerned with possible effects of dioxin and furan emissions that can occur due to the incineration of certain types of plastics. Therefore, we request that plastics be included in the non-combustible solid material and sent off-site for recycling or proper disposal.

The intention of incineration is to burn only food and food contaminated wastes with the use of paper, cardboard and clean wood as a supplementary fuel. EC feels that the proponent should develop an incineration management plan with annual reports to provide details on the following:

- Recycling/segregation waste program
- Incineration technology selected
- The amount and types of waste incinerated
- Operational and maintenance records
- Operator training
- Emission measurements
- Incineration ash disposal

The proponent should also insure that their incineration device is capable of meeting the *Canada-Wide Standards for Dioxins and Furans*, and the *Canada-Wide Standard for Mercury*. 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.

EC should be notified of any 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)  
Mike Fournier (Northern Environmental Assessment Coordinator, A&M, EPO)