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COMMENT FORM FOR NWB SCREENING

The Nunavut Impact Review Board has a mandate to protect the integrity of the ecosystem for the existing and future residents of Nunavut. In order to assess the environmental and socio-economic impacts of project proposals, NIRB would like to hear your concerns, comments and suggestions about the following project application:

Project Title: Ashton Mining Exploratory Drilling
Proponent: Ashton Mining Ltd.
Location: Kiglikavik Lake East- Kitikmeot Region, NWB#: NWB2KLE
Comments Due By: September 12, 2000

Indicate your concerns about the project proposal below:

- | | |
|--|---|
| ☐ no concerns | ☐ traditional uses of land |
| ☐ water quality | ☐ Inuit harvesting activities |
| ☐ terrain | ☐ community involvement and consultation |
| ☐ air quality | ☐ local development in the area |
| ☒ wildlife and their habitat | ☐ tourism in the area |
| ☐ marine mammals and their habitat | ☐ human health issues |
| ☐ birds and their habitat | ☐ |
| Other: ☒ | |
| ☐ fish and their habitat | |
| ☐ heritage resources in area | |

Please describe the concerns indicated above:

- The proponent should be made aware that this area receives considerable carnivore movement-grizzly bears, wolves and wolverines and should take all necessary steps to avoid camp attractant problems and problem bear kills. The proponent is encouraged to contact the local Renewable resource Officer (Andy McMullen) in order to discuss this issue.
- Before Water is released back onto the land, it should be sampled for oil and grease, and then only released if it meets specified guidelines.
- The proponent should update the spill contingency plan to include proper spill reporting procedures (i.e. in addition to contacting the DIO, the proponent also has to contact the Spill Reporting Line).
- See attached.

Do you have any suggestions or recommendations for this application?

Do you support the project proposal? YES ☒ NO ☐

Any additional comments?

Name of person commenting: Sustainable Development incorporates a team approach when commenting on NIRB screenings and Reviews. No one person comments for the Department.

Position: Organisation: Sustainable Development
Signature: Chris Nichols Date: September 5, 2000

DEPARTMENT OF SUSTAINABLE DEVELOPMENT RECOMMENDATIONS FOR LAND USE APPLICATIONS

Environmental Protection

Spill Contingency Plan

The proponent is referred to DSD's *Spill Contingency Planning and Reporting Regulations* and *A Guide to the Spill Contingency Planning and Reporting Regulations*.

Fuel Storage

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. All fuel storage containers should be situated in a manner that allows easy access and removal of containers in the event of leaks or spills. Large fuel caches in excess of 20 drums, should be inspected daily.

Chemical Storage

All chemicals should be stored in a safe and chemically-compatible manner a minimum of 90 feet from all bodies of water. The applicant should be required to remove unused chemicals for reuse or disposal to an approved site using methods approved by the Land Use Inspector. 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.

Location of Hazardous Materials

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. Unless otherwise specified by the land use inspector or licence -issuing agency, all hazardous materials should be removed from the site upon completion of the activity. The proponent is referred to DSD's *Environmental Guideline for the General Management of Hazardous Waste*.

Waste Oil/Waste Fuel Disposal

Waste oil and waste fuel should be removed and returned for recycling when the land use activity is completed. Alternative methods of disposal that provide an equivalent level of environmental protection will be considered on a case by case basis.

Used Drums

Used fuel and oil drums should be removed from the site, returned for deposit, or reused.

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. The proponent is referred to DSD's *Environmental Guideline for Site Remediation*.

Winter Roads

Existing winter road routes and trails should be used whenever possible, to avoid unnecessary land clearing and disturbance.

Drill Sumps

The sumps should only be used for inert drilling fluids, not any other materials or substances. The sumps should be properly closed out.

Garbage Disposal

Garbage should be removed from the camp periodically; alternatively, all combustible wastes can be incinerated on site and non-combustibles collected and removed upon termination of the activity or periodically.

Incineration

For camps of less than 10 people, it is recommended that a draught barrel be employed to burn wastes. A draught barrel is essentially a 45 gallon drum or equivalent, with a hole in the bottom to facilitate air intake, and is closed at the top with a lid and a chimney for the exhaust. EPS does not consider burning wastes in a draught barrel to be true incineration, however, for small camps, this is an acceptable means to deal with camp wastes. The draught barrel should be operated so that a high temperature burn is maintained at all times. This will promote complete combustion and eliminate pollutant and odor concerns.

For camps of more than 10 people, it is recommended that a forced air incinerator be used to manage wastes. Once again maintaining a high temperature burn to reduce wastes is imperative.

Kitchen wastes, cardboard, paper products, packaging and untreated wood wastes are suitable for burning in a draught barrel and a forced air incinerator. Industrial wastes and non combustible wastes should be removed from the camp and disposed of at a designated landfill or other approved facility. Under no circumstance should hazardous wastes be managed through burning or incineration.

For camps of greater than 50 people, it is recommended that a municipal waste incinerator, which produces emissions that meet CCME air quality guidelines, be used to dispose of camp wastes. The manufacturer will specify operating conditions and types of wastes that can be disposed of in the incinerator in order to meet the

specified CCME standards. It is recommended that municipal waste incinerators be operated to meet manufacturer specifications.

The aforementioned comments are a brief thumbnail sketch of what DSD suggests that a proponent should be implementing to mitigate any damage or alterations to the environment during the course of their proposed activities. The proponent is referred to the Government of Nunavut's acts, regulations and environmental guidelines for a details.

Acts, Regulations and Environmental Guidelines

The Environmental Protection Service, Department of Sustainable Development derives its regulatory authority and operational mandate from the Government of Nunavut's *Environmental Protection Act* (EPA). A number of regulations and guidelines have been developed and adopted under the EPA; some, or all of which might prove to be of assistance to a proponent in planning their activities. The guidelines are listed here for the information of the proponent and are available to the public at any DSD office in Nunavut or from DSD's Headquarters office located at:

Department of Sustainable Development
Environmental Protection Service
Government of Nunavut
Box 1340
Iqaluit, NU
X0A 0H0
(867) 979-5119
e-mail: reno@gov.nu.ca or ebaddaloo@gov.nu.ca

Acts and Regulations

Environmental Protection Act

Environmental Protection Act: Simplified Summary

Environmental Rights Act

Spill Planning and Reporting Regulations

A Guide to Spill Contingency Planning & Reporting

Asphalt Paving Industry Emission Regulations

Pesticide Act

Pesticide Regulations

Used Oil and Waste Fuel Management Regulations (undergoing completion; proposed for June 2000)

Environmental Guidelines

Dust Suppression

General Management of Hazardous Waste

Industrial Projects on Commissioner's Lands

Industrial Waste Discharges

Ozone Depleting Substances

Site Remediation

Sulphur Dioxide & Suspended Particulates

Waste Antifreeze

Waste Asbestos

Waste Batteries

Waste Paint

Waste Solvents

Wildlife

DSD Contacts

Renewable Resource Officer,
- Andy McMullen, (867-982-7250
Biologist, Kitikmeot Region, Kugluktuk
- Brent Patterson, (867) 982-7244

Caribou Protection Measures

The Bathurst caribou herd moves through this area in July in the fall. Considerable care should be taken not to disturb the herd. (Please see listed wildlife contacts)

The proponent should be directed to the caribou protection measures developed for the Kaminuriak and Beverly herds and now attached to draft land use plans in Nunavut. Recommendation of these conditions is not restricted to the Kaminuriak and Beverly herds (i.e., they may be applied to other herds as well).

Bear-People Conflicts

The operation is in an area where bears may be encountered. Proper food handling and garbage disposal procedures should be followed to reduce the likelihood that bears will be attracted to the operation. Careful planning and attention to details of camp design and maintenance will decrease the attraction of bears to camp.

The applicant should follow procedures outlined in the "Safety in Bear Country Manual", and should contact the Regional/Area Biologist or the Renewable Resource Officer indicated above for information and advice on measures which should be taken to minimize the possibility of bear-people conflicts.

Raptor Nesting Areas

The project area includes known raptor nesting sites and other areas where it is likely that raptors nest. To minimize negative impacts of this operation on raptors, the applicant should be advised to:

- (a) take care not to disturb nesting raptors from 15 April to 1 September by staying at least 1.5 km away from them when in transit by aircraft, and to avoid approaching them closely while on foot, and
- (b) contact the Regional Biologist in Kugluktuk to identify areas which should be avoided.

The following clause could be included in the covering letter: "If raptors are disturbed during the nesting period, they often abandon the eggs or young. Loud, repeated noises and close approach by humans on foot are particularly harmful."

Low Level Flights

Flying time may be considerable with both movement of people from camps and drill rigs. During the time of migration care should be taken to observe all Transport Canada rules for flight heights.

Aircraft activity with no specific requirements for low level flying should be restricted to a minimum altitude of 300m above ground level.

It should be clearly understood by the proponent that harassment of wildlife is prohibited under the NWT Wildlife Act and this includes low-level flights.

Are exploration personnel allowed to fish/hunt in the areas? This should only be allowed if personnel have the appropriate licenses in compliance with the NWT wildlife ACT. Also, if the camp turns into a long-term operation this policy should be reevaluated. Prolonged hunting or fishing activities in any localized area can have negative impacts upon fish and wildlife populations and this type of activity should be discouraged.

Storage of Chemicals Containing Salts

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

Environmental Assessment

In order to assist the proponent in further environmental assessment work, it should be made aware that the Nunavut Planning Commission has been working with the communities and Government to develop valued ecosystem components, codes of conduct and other useful information. The proponent should contact NPC to obtain copies of these for their future work.

Socio-economic

Community Involvement and consultation

Hiring of local Inuit by the proponent and associated contractors should be encouraged. Information on qualifications of available personnel and job postings can be addressed through hamlet employment officers and Kitikmeot and Employment and Training

Partners manager:

Larry Adjun	Kugluktuk	867-982-4471
Joanne Apsimik	Cambridge Bay	867-983-2337
Sean Peterson	KETP	867-983-2686

Involvement of students for environmental monitoring and studies is encouraged. An Environmental Technology program began at the Nunavut Arctic College in September of 1999. The Proponent is encouraged to contact Ms. Vicki Babinski at 867-983-7237.