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Department of Environment

Ministère de l'Environnement

October 22, 2008

Phyllis Beaulieu  
Manager of Licensing  
Nunavut Water Board

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

**RE: NWB FILE # 2BB-MEL0709 – Comaplex Minerals Corporation – Meliadine Project**

Dear Ms. Beaulieu:

The Government of Nunavut, Department of Environment (DOE) has reviewed the water license amendment application from Comaplex Minerals Corp. for the Meliadine project, and has the following comments and recommendations to make based on the *Environmental Protection Act* regarding upgrades to the fuel storage infrastructure and landfarming.

## Fuel Storage Infrastructure Upgrades

The proposed upgrades to the fuel storage infrastructure includes building a bermed and lined structure to contain fuel bladders as well as any drummed material. According to the document titled *2BB-MEL0709 Amendment Application Request*, the structure will also encompass an oil-water separator system consisting of a lined trench with booms and skimmers on the surface. DOE recommends that any water discharged to the environment from the oil water separator system should be tested to meet appropriate discharge criteria.

## Landfarming

It is DOE's understanding that a landfarm does not form part of this amendment license application. DOE understands from the amendment application that the contaminated soil excavated on site previously is already remediated to near Residential/Parkland standard as listed in the DOE *Environmental Guideline for Site Remediation*. However, from looking at the picture provided in the document *2BB-MEL0709 Amendment Application Request* and the limited details in the application, the landfarm facility seemed inadequate and is not capable of containing contaminated run-off.

If further landfarming and treatment of hydrocarbon contaminated soil is to be carried out on site, DOE has the following recommendations to make for the NWB's consideration:

Details regarding facility design, treatment methodology and monitoring procedures should be submitted for review. For example, stamped engineered drawings are required. Additionally, any contaminated water collected in the landfarm should be treated to an appropriate standard such as the CCME standards prior to discharge to the receiving environment.

DOE thanks the NWB for the opportunity to provide comments on the Comaplex Minerals Corp.'s water license amendment application. Please contact us if you have further questions.

