



Environment Canada Environnement
Canada Canada

Environment Canada
Northern Division
Prairie and Northern Region
#301-5204 50th Ave.
Yellowknife, NT X1A 1E2

October 23rd, 2008

Your File: 2BB-MEL0709
Our File: 4703 001 062

Phyllis Beaulieu
Manager of Licencing
Nunavut Water Board
PO Box 119
Gjoa Haven, NU
X0B 1J0

**Re: Comaplex Minerals – Meliadine Project – Amendment – Type B Water
Licence**

On behalf of Environment Canada (EC), I have reviewed the information submitted with the above-mentioned application. The following specialist advice has been provided pursuant to Environment Canada's mandated responsibilities for the enforcement of the *Canadian Environmental Protection Act*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

On September 15th the Nunavut Water Board received an amendment application for a Type B Water Licence for water use and waste disposal on behalf on Comaplex Minerals Corp. The amendment is for construction of a semi-permanent fuel berm and to allow for a small land farm on the waste rock pad. The application for the amendment came to being as a result of the an Inspector's Direction dated August 13th, 2008, where the Indian and Northern Affairs Canada (INAC) Inspector found several issues that the Inspector believed were violating the terms and conditions of the water licence.

Under section 1.16 of the Fuel Farm Berm Construction Plans, Comaplex Minerals Corp. states that 'The sump shall have a water pump powered by a generator installed as required when water build up occurs in the sump area.' Environment Canada would like to know where this water will be discharged and recommends that the water be tested prior to discharge to ensure that no toxic substances are being released.

On September 8th 2008, Comaplex sent a letter to the Minister of INAC, the Nunavut Water Board and the RDG for the INAC Nunavut District Office regarding the Inspectors Directions that included issues not only related to the fuel berm and fuel farm but also waste disposal. With respect to the matter of the grey water sump, Comaplex Minerals Corp. has stated that the camp will shut down by the end of October and will therefore discontinue using the grey water sump. They have also stated that they will be installing a water treatment system to treat grey water and sewage and that this should be installed by fall of 2008. Environment Canada looks forward to reviewing the waste water treatment system as part of an amendment to the current water licence. Should

the system not be installed by the time the camp opens in the spring Environment Canada would like to be contacted to discuss how the issues with the current sump will be addressed.

The final issue Environment Canada is concerned with is incineration of sewage under Part D, Section 7 of the water licence. Sewage should not be burned in batch incinerators that are typically used in the north. Sewage has high moisture content and low heat content that will increase operating costs dramatically and lead to poor incinerator performance. It is unlikely that the sewage will be completely combusted and this could lead to the release of pathogens into the environment. The high moisture materials can leak from the incinerator hearth and lead to equipment damage and present health hazards to workers. Environment Canada recommends that more appropriate methods of disposing of sewage be used.

Environment Canada is currently developing a Technical Guidance Document for Incineration on Federal Lands which addresses the burning of sewage as well as other incineration issues. Environment Canada will forward the guidance document to the Board when it is released in early 2009.

Please do not hesitate to contact me at (867) 669-4772 or savanna.levenson@ec.gc.ca with any questions or comments with regards to the foregoing.

Yours truly,

Savanna Levenson
Environmental Assessment Specialist
Environmental Protection Operations

c.c: Carey Ogilvie, Head EA North, Environment Canada
Anne Wilson, Water Pollution Specialist, EA North, Environment Canada