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Environnement Canada

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Our File: 4703 001 062
NWB File: 2BB-MEL0914

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Re: 2BB-MEL0914/ D10 Submission of Waste Management Plan Revised September 2009

Environment Canada (EC) has reviewed the submission of the Waste Management Plan (Plan) by Comaplex Minerals Corporation (Comaplex) for the Meliadine West Gold Project. EC makes the following comments and recommendations pursuant to the *Canadian Environmental Protection Act*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

- Please note that EC has finalized the Technical Document for Batch Waste Incineration, and is now available at the following web link: <http://www.ec.gc.ca/drgd-wrmd/default.asp?lang=En&n=82401EC7-1>
- Environment Canada recommends that the proponent ensure that all hazardous waste manifesting and tracking requirements under the Nunavut Environmental Protection Act and Transportation of Dangerous Goods Act are adhered to.
- Under section 2.4 on sludge disposal it states that the sludge will be removed from the Biodisk treatment plant and applied to drill sites needing reclamation where it will act as a fertilizer and promote plant growth (p. 14). In Canada, the use of biosolids or sewage sludge is regulated under provincial/territorial jurisdictions and is commonly in the context of application to agricultural land. Although, there is no available territorial legislation, most provinces have specific guidelines for using sludge to enhance soil nutrient quality.

In Alberta for example, the Guidelines for the Application of Municipal Wastewater Sludges to Agricultural Lands (Government of Alberta, 2001) state that application of sludge to agricultural land is an acceptable practice provided that it meets the provincial guidelines. The issues associated with using biosolids involve contamination of receiving soils with metals, chemicals and pharmaceuticals, as well as changes to soil properties and chemistry from repeated applications. If application of biosolids or sludge is an acceptable practice for agricultural lands, it should not pose environmental risks if appropriate standards are followed as prescribed in the guidelines. Therefore, it is recommended that CMF consults provincial guidelines on appropriate levels of application of sludge and tests their sludge prior to applying it to drill sites.

If you should have any questions regarding the foregoing please contact Environment Canada via email at EC.EA.NU@ec.gc.ca.

Yours truly,

Original signed by

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cc: Carey Ogilvie (Head, EA-North, Environment Canada, Yellowknife, NT)
Anne Wilson (Water Pollution Specialist, Environment Canada, Yellowknife, NT)
Mirey Lopez (Contaminated Sites Officer, Environment Canada, Calgary, AB)

References

Government of Alberta. 2001. Guidelines for the Application of Municipal Wastewater Sludges to Agricultural Lands.
Retrieved from <http://www.environment.alberta.ca/1019.html>.