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Department of Environment

Ministère de l'Environnement

June 29, 07

Richard Dwyer
Licensing Trainee
Nunavut Water Board

via Email to: licensingtrainee@nunavutwaterboard.org

**RE: NWB FILE # 2BE-AME – URANIUM NORTH RESOURCES CORP. –AMER
LAKE URANIUM EXPLORATION PROJECT**

Dear Mr. Dwyer:

The Government of Nunavut, Department of Environment (DOE) has reviewed the water license application from the Uranium North Resources Corp. for the Amer Lake project for conducting uranium exploration approximately 150 km north-northwest of Baker Lake. The DOE believes the project will not result in significant adverse effects although the potential for negative environmental impacts exists. Based on the *Environmental Protection Act* and the Keewatin Regional Land Use Plan, the DOE has the following comments to make regarding waste management, abandonment & restoration, and land use planning.

1. WASTE MANAGEMENT

A. Spill Contingency Plan

Based on the DOE's *Spill Contingency Planning and Reporting Regulations*, and the *Contingency Planning and Spill Reporting in Nunavut: a Guide to the New Regulations*, the DOE has the following comments to make:

- It is unclear if the proponent contact information provided is a 24-hour contact number; it is important the name, job title and 24 hour telephone number for the persons responsible for activating the contingency plan be provided. This ensures the employee discovering the spill can activate a response and provides a 24 hour point of contact for the authority investigating the spill.

- Chemical names, volumes and weights of both fuel and chemicals such as drill additives to be used on site should be provided within the spill plan.
- A site map that is intended to illustrate the facilities relationship to other areas that may be affected by the spill. The map should be to scale and be large enough to include the location of your facility, nearby buildings or facilities, roads, culverts, drainage patterns, and any nearby bodies of water.
- The DOE recommends the new spill form be utilized in the case of spills, and spill information be entered electronically so the information is legible to authority investigation the spill. The new spill form with instructions can be obtained from the Spill Line at (867) 920-8130.

B. Camp Incinerator

The Government of Nunavut is a signatory to the *Canada-Wide Standards for Dioxins and Furans*, and the *Canada-Wide Standards for Mercury Emissions*. The DOE therefore has the following comments to make.

For camps of 10 to 50 people, the proponent shall apply appropriate technologies to ensure complete combustion of wastes, and the use of a dual chamber, forced-air incinerator is recommended. Burning of wastes in a burn barrel as indicated in the licence application is unacceptable. The proponent shall make determined efforts to achieve compliance with the CWS. Efforts should include the implementation of a comprehensive waste management strategy (especially waste segregation) that is designed to reduce and control the volumes of wastes produced, transported, and disposed of.

Waste wood treated with preservatives such as creosote, pentachlorophenol or heavy metal solutions should not be burned. Additionally, plastics, electrical wire, asbestos and building demolition wastes (except clean wood) are wastes likely to produce dioxins and furans when burned and should be excluded from incineration.

2. ABANDONMENT & RESTORATION PLAN

Base on the DOE *Guideline for Contaminated Site Remediation*, we therefore have the following comments and recommendations to make:

- If hydrocarbon based drill additives such as rod grease are used as proposed in the licence application, DOE recommends the use of a filtration system aimed towards reduction of harmful substances to the environment. It is important that sumps be used for only inert drilling fluids, not any other materials.

- Core storage areas should be located at least 100 meters from the high waterline of all water bodies.

3. LAND USE PLANNING

There is a concern that the issuing of licenses or permits relating to exploration for uranium may lead to an expectation that further development of these projects will be permitted. The DOE is aware that the Nunavut Planning Commission has determined low level exploration for Uranium to be in conformity with the Keewatin Regional Land Use Plan but believes the proponent should be aware of the following provisions in the plan:

3.5 - Uranium development shall not take place until NPC, NIRB, NWB and the NWMB have reviewed all of the issues relevant to uranium exploration and mining. Any review of uranium exploration and mining shall pay particular attention to questions concerning health and environmental protection.

3.6 – Any future proposal to mine uranium must be approved by the people of the region.

The DOE thanks NWB for the opportunity to provide comments on the Amer Lake water license application. Please contact us if you have further questions.

Yours sincerely,

Original signed by

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