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Department of Environment

Ministère de l'Environnement

November 20, 2009

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board

via Email to: licensing@nunavutwaterboard.org

RE: NWB FILE # 2BE-ANG0813 –Angilak Project Amendment Request

Dear Ms. Beaulieu:

The Government of Nunavut, Department of Environment (DOE) has reviewed the water license amendment request from the Kivalliq Energy Corporation for the Angilak Project. The DOE has the following comments and recommendations based on the *Environmental Protection Act*.

SPILL CONTINGENCY PLANNING

Upon establishment of the new camp, the Proponent should submit a site map that is intended to illustrate the facilities relationships to other areas that may be affected by a spill. The map should be to scale and should be large enough to include the location of all facilities (shelters, fuel caches, landing strips/pads, etc.), as well as any nearby drainage patterns and bodies of water.

The Proponent should work to establish a 24-hour contact number for this project as soon as possible and include it in the Plan.

The Proponent has listed the incorrect contact number for the GN-DOE in Section 5.4. The correct number is (867)-975-7700.

ABANDONMENT & RESTORATION

The Proponent is reminded that all drill sumps are to be used for the disposal of inert drilling fluids only, and not any other materials or substances.

The Government of Nunavut is a signatory to the *Canada-Wide Standards for Dioxins and Furans*, and *Canada-Wide Standards for Mercury Emissions*. DOE recommends that the Proponent include the following information in the A&R Plan.

For a camp of greater than 10 but less than 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. The proponent shall make determined efforts to achieve compliance with the Canada-wide Standards for dioxins and furans and the Canada-wide Standard for Mercury. 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. The Waste Management Strategy should consider and include:

- Purchasing policies that focus on reduced packaging,
- On-site diversion and segregation programs (i.e. the separation of non-food waste items suitable for storage and subsequent transport and disposal or recycling).
- If incineration is required, ensure diligent operation and maintenance of the incineration device and provide appropriate training to the personnel operating and maintaining the incinerator.

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. Under no circumstance should hazardous wastes be managed through burning or incineration. The efforts made to achieve compliance shall be reported as part of the annual report.

The DOE thanks the NWB for giving us the opportunity to review and provide comments on Kivalliq Energy Corporation's amendment request for the Angilak Project. Please contact us if you have any questions or comments.

Yours sincerely,

Original signed by

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