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Department of Environment

Ministère de l'Environnement

June 2, 2008

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board

via Email to: licensingadmin@nunavutwaterboard.org

RE: NWB FILE # 2BE-ANG – Kivalliq Energy Corporation – Angilak Lake Uranium Exploration Project

Dear Ms. Beaulieu:

The Government of Nunavut, Department of Environment (DOE) has reviewed the water license application from Kivalliq Energy Corporation Angilak Lake Project, for their uranium exploration activities. Based on the *Environmental Protection Act* and the *Wildlife Act*, DOE has the following comments and recommendations to make regarding spill contingency and abandonment & restoration.

1. Spill Contingency Plan

The following recommendations and comments are based on the DOE *Spill Contingency Planning and Reporting Regulations, Contingency Planning and Spill Reporting in Nunavut: a Guide to the New Regulations*, and *Guideline for the General Management of Hazardous Waste in Nunavut*. Consequently; DOE recommends the following be included in the Spill Contingency Plan (SCP):

- A site map that is intended to illustrate the facilities relationship to other areas that may be affected by the spill, and should be included in the Spill Contingency Plan once a camp is set up. 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 contact number is inaccurate and should be updated (Section 5.4 and 6.2 of the Spill Contingency Plan). The correct numbers at DOE is (867) 975-7700 for general reception or (867) 975-7748 for the Manager of Pollution Control.
- Hazardous materials stored on-site should be marked so they will be visible under all conditions, in all seasons. This recommendation is intended to help prevent possible injuries to camp personnel and/or damage to the containers. Unless otherwise specified by the land use inspector or license -issuing agency, all hazardous materials should be removed from the site upon completion of the activity. The proponent is referred to DoE's *Environmental Guideline for the General Management of Hazardous Waste*.

2. Abandonment & Restoration Plan

Drill Sumps

The sumps should only be used for inert drilling fluids, not any other materials or substances. The sumps should be properly closed out.

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Incineration

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

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.

Final Inspections

Final inspections of the entire site should be conducted by the proponent and lead agency to make sure that all areas of the site have been reclaimed as much as possible to its previous condition. Soil samples and pictures before and after the project would make this process easy on the proponent and leading agencies involved in determining areas of concern.

The DOE thanks NWB for the opportunity to provide comments on the Kivalliq Energy Corporation's water license application. Please contact us if you have further questions.

Yours sincerely,

Original signed by

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