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Department of Environment

Ministère de l'Environnement

July 16, 2008

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board

<u>via Email to:</u> licensing@nunavutwaterboard.org

RE: NWB File No. 2BE-BIP – Rockgate Capital Corporation – Bathurst Inlet Project

Dear Ms Beaulieu:

The Government of Nunavut, Department of Environment (DOE) has reviewed the Bathurst Inlet project proposal from Rockgate Capital Corporation for conducting gold exploration in and near Bathurst Inlet. The DOE does not believe the project will result in significant adverse effects although the potential for negative environmental impacts exists. Based on the *Environmental Protection Act*, DOE has the following comments to make regarding spill contingency planning, and abandonment and restoration.

A. SPILL CONTINGENCY PLANNING

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*, DOE has the following comments and recommendations to make:

- Please be advised that the telephone number for the GN-Department of Environment is (867) 975-7700.

- A <u>24 hour telephone number</u> for the persons responsible for activating the contingency plan should 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.

- The proponent has referenced the INAC Spill Reporting Protocol, and the Nunavut Spill Contingency and Reporting Regulation. For further information, the proponent is also referred to DOE's *Environmental Guidelines for Site Remediation* and *Contingency Planning and Spill Reporting in Nunavut: a Guide to the New Regulations.*

- If fuel is stored on site, it should be located, whenever practical, in a natural depression a minimum distance of 90 feet from all streams, and preferably in an area of low permeability. All fuel storage containers should be situated in a manner that allows easy access and removal of containers in the event of leaks or spills. Large fuel caches in excess of 20 drums should be inspected daily.

B. ABANDONMENT AND RESTORATION

1. Drill holes/sumps

The proponent has proposed that drill cuttings are to be deposited on depressions on the land, and waste water from the drilling operations is proposed to be discharged on to the land. DOE has the following comments and recommendations to make:

- Drill holes should be backfilled or capped at the end of project. The sumps should only be used for inert drilling fluids, not any other materials or substances. The sumps should be properly closed out at the end of a project.

- If hydrocarbon based drill additives are used, the use of a filtration system aimed towards reduction of harmful substances to the environment is recommended. Drill additives such as rod grease and linseed soap should be safely stored in containers that have been specifically designed for the storage of hydrocarbons and safely transported to a facility that is authorized for the treatment and disposal of industrial wastes. The waste must be stored in a manner that minimizes the risk of spills and further ensures that the container can be periodically inspected for leaks or potential leaks.

- Drilling additives shall not be used in connection with holes drilled through lake ice unless they are re-circulated or contained such that they do not enter the water, or demonstrated to be non-toxic.

2. Incineration

The proponent has indicated that most non-combustible wastes will be removed to Yellowknife, while combustible waste will be burned either onsite, or at the camp. 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 Emissions*. 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
- 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 DOE thanks NWB for the opportunity to provide comments on the project proposal from Rockgate Capital Corporation. Please contact us if you have further questions.

Yours sincerely,

Original signed by

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