



ᐱᐃᐃᐃᐃᐃᐃᐃᐃ

Avatiligiyiit

Department of Environment

Ministère de l'Environnement

Aug. 10, 07

Phyllis Beaulieu  
Manager of Licensing  
Nunavut Water Board

**via Email to:** [licensing@nunavutwaterboard.org](mailto:licensing@nunavutwaterboard.org)

**RE: NWB FILE # 2BE-BRO – DIAMONDEX RESOURCES LTD. – BRODEUR  
AMENDMENT WATER LICENSE APPLICATION**

Dear Ms. Beaulieu:

The Government of Nunavut, Department of Environment (DOE) has reviewed the Brodeur amendment water license application from Diamondex Resources Ltd. for diamond exploration located 113 km west of Arctic Bay. Based on the DOE legislative mandate under the *Environmental Protection Act*, we have the following recommendations to make regarding abandonment and restoration, and waste management.

**ABANDONMENT & RESTORATION**

Based on the DOE *Guideline for Contaminated Site Remediation*, we recommend that soil contaminated by fuel (e.g., soils under an old storage tank) be treated on site or removed to an approved disposal site and replaced with new soil. Soils in the vicinity of fuel and/or chemical storage should be tested and disposed off if necessary.

**WASTE MANAGEMENT**

The Government of Nunavut is signatory to *Canada-Wide Standards (CWS) for Dioxins and Furans*, and *CWS for Mercury Emissions*. The DOE therefore requests the proponent ensures incineration emissions comply with the CWS by implementing the following recommendations.

For a camp 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. 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. 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. Finally, hazardous wastes should not be managed through burning or incineration.

The DOE thanks the NWB for giving us the opportunity to review and provide comments on the Brodeur amendment water license application. Please contact us if you have any further questions or comments.

Yours sincerely,

***Original signed by***

Helen Yeh  
Environmental Assessment Coordinator  
Department of Environment  
Government of Nunavut