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Department of Environment

Ministère de l'Environnement

March 12, 2008
Richard Dwyer
Licensing Administrator
Nunavut Water Board

via Email to: licensingadmin@nunavutwaterboard.org

RE: NWB FILE 2BE-BRO0607 – Diamondex Resources Ltd. – Brodeur Peninsula Diamond Exploration Project

Dear Mr. Dwyer:

The Government of Nunavut, Department of Environment (DOE) has reviewed the Water Licence Renewal and Amendment Application from Diamondex Resources Ltd., and has the following comments and recommendations to make.

Spill Contingency Plan

General:

The Spill Contingency Plan should be updated to include the following

- *The name, job title and 24 hour telephone number for the persons responsible for activating the contingency plan.* 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.
- *A site map for the 'future camp' 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, drainage patterns, and any nearby bodies of water.
- The contact information list should be updated. The telephone number for the Government of Nunavut – Department of Environment is 975-7700.
- A description of the type and amount of fuels and chemicals normally stored on site. This would include chemical names, volumes, and weights of the contaminants as well as storage methods.

Contaminated Soils:

Soil contaminated by fuel (e.g., soils under an old storage tank) should 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.

Chemical Storage

All chemicals should be stored in a safe and chemically-compatible manner a minimum of 90 feet from all bodies of water. The applicant should be required to remove unused chemicals for reuse or disposal to an approved site using methods approved by the Land Use Inspector. Material

safety data sheets (MSDS) should be provided for each chemical and be posted in a central location; accessible by all camp personnel. Camp personnel should be conversant in the handling of these chemicals as well as able to deal with any accidents or spills.

Hazardous Materials Management

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*.

Abandonment & Restoration Plan

Contact information:

The Proponents contact information should be included in the plan. The proponent may want to include:

- Owner and site supervisor contact names, addresses and numbers.

Incineration:

If the proponent chooses to use an incinerator 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 to the Nunavut Impact Review Board 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.

