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Department of Environment

Ministère de l'Environnement

Feb. 12, 07

Richard Dwyer  
Licensing Trainee  
Nunavut Water Board

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

**RE: NWB FILE # 2BE-CRA – COMMITTEE BAY RESOURCES LTD. –  
CRATER LAKE PROJECT**

Dear Mr. Dwyer:

The Government of Nunavut, Department of Environment (DOE) has reviewed the Crater Lake project from Committee Bay Resources Ltd. for conducting diamond and gold exploration west of Repulse Bay, and has the following comments and recommendations to make.

**1. SPILL CONTINGENCY PLAN:**

Based on the Government of Nunavut *Spill Contingency Planning and Reporting Regulations*, and DOE's guideline - *Contingency Planning and Spill Reporting in Nunavut: a Guide to the New Regulations*, DOE has the following recommendations to make:

- A site map that is intended to illustrate the facility 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, roads, culverts, drainage patterns, and any nearby bodies of water. Site maps of all the camps should be provided.
- A description of the type and amount of fuels and chemicals normally stored on site should be included.
- 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.
- To prevent spreading in the event of a spill, fuel stored in drums should be located, whenever practical, in a natural depression a minimum distance of 90 feet from all streams, preferably in an area of low permeability.

- An inventory and the location of response and clean up equipment available to implement the plan should be included in the spill plan. This includes your equipment as well as any to be used by another person responding to the spill on your behalf.
- The proponent is recommended to utilize the newly developed spill report form in the case of spills, and to enter spill information via a computer so it is legible to recipients such as government agencies. The attached includes the new spill form and instructions for completing the forms.

## **2. ABANDONMENT & RESTORATION**

Based on the DOE's *Guideline for Contaminated Site Remediation*, and *Guideline for the General Management of Hazardous Waste in Nunavut*, DOE recommends the following:

- The DOE monitors the movement of hazardous wastes including waste fuel, from generators, carriers to receivers, through a tracking document (Waste Manifest). A Waste Manifest must accompany all movements, and all parties must register with the DOE. This registration can be done by contacting Rob Eno at (867) 975-7748 or [reno@gov.nu.ca](mailto:reno@gov.nu.ca).
- Soil contaminated by fuel and hazardous chemicals (e.g., soils under fuel storage tanks) should be treated on site or removed to an approved disposal site and replaced with new soil.
- 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.

## **3. INCINERATION**

The Government of Nunavut is signatory to the Canada-Wide Standard (CWS) for dioxins and furans, and the CWS for mercury; therefore, we advise the proponent follows recommendations below to ensure compliance with CWS for incineration.

For camps 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 CWSs for dioxins and furans and CWS 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.

#### **4. WILDLIFE**

##### Caribou

Barren-ground caribou of Wager Bay herd winters around the project area, and caribou that winters within this area would likely move in spring to either south to Wager Bay or north to Committee Bay. DOE recommends the following recommendations be implemented when caribou is observed:

- During migration of caribou, the proponent shall not locate and operate so as to block or cause substantial diversion to migrating caribou. The proponent shall cease activities that may interfere with migration, such as airborne geophysics surveys or movement of equipment, until the migrating caribou have passed.
- Low-level overflights should be avoided when concentrations of caribou is encountered.

##### Flight Disturbance

Unless there is a specific requirement for low level-flights, aircraft activities should maintain a minimum altitude of 610 meters above ground level in places where there are occurrences of wildlife. In areas where there are observed large concentrations of birds, flight level is restricted to 1,000 meters vertical distance and 1,500 meters horizontal distance from the birds. These guidelines are provided as a general standard, and exceptions may arise on a case-by-case basis. As a good practice, it is recommended to avoid critical and sensitive wildlife areas at all times by choosing alternate flight corridors.

The DOE thank NWB for giving us the opportunity to review and provide comments on the Crater Lake project. 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  
P.O. Box 1000, Stn. 1360  
Iqaluit, Nu X0A 0H0  
PH: (867) 975-7733  
FX: (867) 975-7739  
EM: [hyeh@gov.nu.ca](mailto:hyeh@gov.nu.ca)

Attachment 1: NT-NU Spill Report Form

Attachment 2: Instructions for Completing the NT-NU Spill Report Form

