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Department of Environment

Ministère de l'Environnement

June 9, 2008

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board

via Email to: licensingadmin@nunavutwaterboard.org

RE: NWB FILE # 2BE-DUB – Uranium North Resources Corp. – Dubawnt Lake/South Baker Uranium Exploration Project

Dear Ms. Beaulieu:

The Government of Nunavut, Department of Environment (DOE) has reviewed the water license application from Uranium North Resources Corp. for the Dubawnt Lake/South Baker Property Uranium Exploration Project approximately 340 km from Baker Lake, and has the following comments and recommendations to make based on the *Environmental Protection Act* regarding spill contingency and abandonment & restoration and uranium development.

1. Spill Contingency Plan

The subsequent 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, should be provided 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, drainage patterns, and any nearby bodies of water.
- 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.
- The contact information list of Regulatory Bodies should be updated to include the following:

Department of Environment
Government of Nunavut

Phone (867) – 975 – 7700

Manager Pollution Control and Air Quality Phone (867) – 975 – 7748
Environmental Protection Fax (867) – 975 – 7739
Government of Nunavut

2. Abandonment & Restoration Plan

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

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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.

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.

3. Uranium Development

There is a concern that the issuing of permits relating to exploration for uranium may lead to an expectation that further development of these projects will be permitted. The GN is aware that Nunavut Planning Commission has determined low level exploration for uranium to be in conformity with the Keewatin Regional Land Use Plan but believes the proponent should be aware of the following provisions in the plan:

3.5 - Uranium development shall not take place until NPC, NIRB, NWB and the NWMB have reviewed all of the issues relevant to uranium exploration and mining. Any review of uranium exploration and mining shall pay particular attention to questions concerning health and environmental protection. (A) (CR)

3.6 – Any future proposal to mine uranium must be approved by the people of the region.

The DOE thanks NWB for the opportunity to provide comments on the Uranium North Resources Corp.'s water license application. Please contact us if you have further questions.

Yours sincerely,

Original signed by

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