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## Avatiliqiyiit

Department of Environment

Ministère de l'Environnement

File No. NWB2EDE

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Richard Dwyer  
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Nunavut Water Board

**Via E-mail to:**

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**RE: Tri-Origin Exploration Ltd.- Edehon Lake Project**

The Department of the Environment (DOE) thanks Nunavut Water Board for the opportunity to provide comments on the Abandonment & Restoration plan (A&R) & Spill Plan of the Edehon Lake claim group.

**General Comments:**

DOE recommends that the Abandonment and Restoration plan be updated by the proponent to consolidate all of the information scattered through several documents;

- Site restoration plan
- Abandonment and Restoration Plan
- NWB supplementary information requests to Tri- Origin Exploration Ltd.
- Project Summary

There is some information missing from the document, including;

## I. Introduction:

A brief description of the site including the location, the dates for starting and abandonment, the number of workers on site and the approximate areas being disturbed.

## ***II. Hazardous Materials:***

Please identify and prepare an inventory of all hazardous materials on site. 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*.

### III. Fuel Storage

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. 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. MSDS sheets should be provided for each fuel and be posted in a central location; accessible by all camp personnel. This information will provide the hazards of each fuel (i.e. flammability) and the methods of dealing with the fuel in the event of a spill. Large fuel caches in excess of 20 drums should be inspected daily.

#### ***IV. 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.

## V. Spill Contingency Plan

The plan should include a list of available spill response equipment and their locations and the names of trained personnel who will be on-site and available in the case of a spill. Additionally, the company name, number, address including the president, site supervisor, environmental supervisor and emergency contacts must all be included.

The proponent is referred to DoE's *Spill Contingency Planning and Reporting Regulations* and *A Guide to the Spill Contingency Planning and Reporting Regulations*.

## VI. Final Inspections

The A&R plan lists environmental consultants to be consulted as necessary. Please provide specific consulting organization or individuals including contacts for final inspections. Pictures need to be taken before and after reclamation and soil samples after reclamation.

## Acts, Regulations and Environmental Guidelines

The proponent is referred to the Government of Nunavut's acts, regulations and environmental guidelines:

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The Environmental Protection, Department of Environment derives its regulatory authority and operational mandate from the Government of Nunavut's *Environmental Protection Act* (EPA). A number of regulations and guidelines have been developed and adopted under the EPA; some, or all of which might prove to be of assistance to a proponent in planning their activities. The guidelines are listed here for the information of the proponent and are available to the public at any DoE's office in Nunavut or from DoE's Headquarters in Iqaluit.

## Acts and Regulations

### *Environmental Protection Act*

## Environmental Protection Act: Simplified Summary

## Environmental Rights Act

## Spill Planning and Reporting Regulations

## A Guide to Spill Contingency Planning & Reporting

## Asphalt Paving Industry Emission Regulations

### *Pesticide Act*

## Pesticide Regulations

*Used Oil and Waste Fuel Management Regulations* (undergoing completion; proposed for June 2000)

## Environmental Guidelines

### *Dust Suppression*

## General Management of Hazardous Waste

### *Industrial Projects on Commissioner's Lands*

### Industrial Waste Discharges

### Ozone Depleting Substances

## Site Remediation

### *Sulphur Dioxide & Suspended Particulates*

### Waste Antifreeze

## Waste Asbestos

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### Waste Batteries

### Waste Paint

## Waste Solvents

Once again the Department of Environment thanks Nunavut Water Board for the opportunity to comment on this project proposal.

Sincerely,

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