

<u>NWB File:</u> NWB2FER00305

Mrs. Phyllis Beaulieu Manager of Licensing Nunavut Water Board P.O. Box 119 Gjoa Haven, NU X0E 1J0

via Email to:
licensing@nwb.nunavut.ca

Dear Mrs. Beaulieu:

Re: Starfield Resources Inc. Application for renewal of License for Ferguson Lake (NWB2FER0305)

The Department of Environment (DOE), has reviewed Starfield Resources Inc. application for renewal of license for Ferguson Lake and has the following comments to make.

Spill Contingency Plan

The spill contingency plan provided by the proponent in not adequate. The proponent is referred to DoE's Guidelines for Spill Contingency Planning and Reporting. The proponent should be requested to submit an up to date spill contingency plan that is satisfactory.

More specifically we suggest the plan include the following:

- 1) A more detailed description of the project area making sure to include the location, size, and storage capacity of all facilities located on site. This is important if persons are unfamiliar with the facility or area.
- 2) The site map that is included in the plan is clumped together and you can't really see the facilities in the project area. 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 nearby bodies of water.
- 3) The name and address of the person in charge, management or control. This is an on-site person responsible for managing the facility. This person would be initially responsible for clean up activities.
- 4) The name and address of the employer if different from the person in charge. This is the person ultimately responsible for the facility, usually the owner.
- 5) 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



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can activate a response and provides a 24 hour point of contact for the authority investigating the spill.

- 6) A description of the training provided to employees to respond to a spill. A sound training program is necessary when dealing with an emergency situation
- 7) The date the contingency plan was prepared.
- 8) A list of local contractors or clean up specialists who may be called upon to assist in responding to spills. A list of emergency numbers such as fire, ambulance and police. MSDS for each product or contaminant stored at your facility.

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. Large fuel caches in excess of 20 drums, should be inspected daily.

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.

Location of Hazardous Materials

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*.

Used Drums

Used fuel and oil drums should be removed from the site, returned for deposit, or reused.



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. The proponent is referred to DoE's *Environmental Guideline for Site Remediation*.

Winter Roads

Existing winter road routes and trails should be used whenever possible, to avoid unnecessary land clearing.

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.

Garbage Disposal

Garbage should be removed from the camp periodically; alternatively, all combustible wastes can be incinerated on site and non-combustibles collected and removed upon termination of the activity or periodically.

<u>Incineration</u>

For camps of less than 10 people, it is recommended that a draught barrel be employed to burn wastes. A draught barrel is essentially a 45 gallon drum or equivalent, with a hole in the bottom to facilitate air intake, and is closed at the top with a lid and a chimney for the exhaust. EPS does not consider burning wastes in a draught barrel to be true incineration, however, for small camps, this is an acceptable means to deal with camp wastes. The draught barrel should be operated so that a high temperature burn is maintained at all times. This will promote complete combustion and eliminate pollutant and odor concerns.

For camps of more than 10 people, it is recommended that a forced air incinerator be used to manage wastes. Once again maintaining a high temperature burn to reduce wastes is imperative.

Kitchen wastes, cardboard, paper products, packaging and untreated wood wastes are suitable for burning in a draught barrel and a forced air incinerator. Industrial wastes and non combustible wastes should be removed from the camp and disposed of at a designated landfill or other approved facility. Under no circumstance should hazardous wastes be managed through burning or incineration.



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For camps of greater than 50 people, it is recommended that a municipal waste incinerator, which produces emissions that meet CCME air quality guidelines, be used to dispose of camp wastes. The manufacturer will specify operating conditions and types of wastes that can be disposed of in the incinerator in order to meet the specified CCME standards. It is recommended that municipal waste incinerators be operated to meet manufacturer specifications.

We thank the NWB for giving us the opportunity to review the appliaction. Please contact me if you have any further questions or comments.

Sincerely,

Original signed by

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