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Department of Environment

Ministère de l'Environnement

March 17, 2008
Richard Dwyer
Licensing Administrator
Nunavut Water Board

via Email to: licensingadmin@nunavutwaterboard.org

RE: NWB FILE # 2BE-FRK – Barry Hanslit – Fork Property Diamond Exploration Project

Dear Mr. Dwyer:

The Government of Nunavut, Department of Environment (DOE) has reviewed the Water License Application for the Fork Property Diamond Exploration Project by Barry Hanslit, and has the following comments and recommendations to make.

Spill Contingency Plan

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 should be provided for each fuel and be posted in a central location in the event of a spill. 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.

Incineration

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
- 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.

Spill Clean Up

The proponent suggests cleaning up hydrocarbon spills by removing the contaminated sand/soil and incinerating it. Although incineration of contaminated soil/sand may work, the soil/sand has to be saturated in order to ignite. GN-DOE requests the proponent revise the Spill Contingency Plan and provide a detailed description of clean up techniques.

Abandonment & Restoration

Drill holes should be backfilled or capped at the end of project. The sumps should only be used for inert drilling fluids, not any other materials or substances. The sumps should be properly closed out at the end of a project.

The GN thanks NWB for the opportunity to provide comments on this water license application. Please contact us if you have further questions.

Yours sincerely,

Original signed by

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