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Department of Environment
Ministère de l'Environnement

May 1, 07

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board

via Email to: licensing@nunavutwaterboard.org

RE: NWB2BE-HIG – WOLFDEN RESOURCES INC. – HIGH LAKE PROJECT

Dear Ms. Beaulieu:

The Government of Nunavut, Department of Environment (DOE) has reviewed the water license renewal application from the Wolfden Resources Inc. for the High Lake project for base metal exploration approximately 175 km southeast of Kugluktuk. The DOE believes the project will not result in significant adverse effects although the potential for negative environmental impacts exists. Based on the *Environmental Protection Act* and the *Wildlife Act*, the DOE has the following comments to make regarding spill contingency, abandonment & restoration, and air quality.

1. SPILL CONTINGENCY:
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*, we have the following comments and recommendations to make:

- It is unclear whether or not contact numbers provided are 24-hour numbers. The 24-hour number for the persons responsible for activating the contingency plan is required as this ensures the employee discovering the spill can activate a response and provides a 24-hour point of contact for the authority investigating the spill.

- Page 8 of the *Spill Contingency Plan* stated that the proponent would "contact Federal and Territorial regulatory agencies to identify appropriate disposal methods before disposing of contaminated material." Regulators such as the DOE do not provide disposal instructions, and it is the proponent's responsibility to develop a complete plan which addresses the steps to be taken from the start of the spill, up to and including the final clean up and

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disposal. The regulators can review the final plan to assess its adequacy and provide advice at that time.

- The DOE monitors the movement of hazardous wastes from generators, carriers to receivers, through a tracking document (Waste Manifest). A Waste Manifest must accompany all movements, and all parties must register at DOE with Robert Eno at reno@gov.nu.ca or (867) 975-7748.

- A description of the type and amount of chemicals such as drill additives stored on site should be provided in the spill plan.

- 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.

- The NWT-Nunavut spill report form has been updated, and can be obtained from the Spill Line. The proponent is advised to enter spill information electronically in the form so the information is legible to regulators inspecting spills.

2. ABANDONMENT & RESTORATION

Based on the DOE's *Guideline for Contaminated Site Remediation,* we recommend the following:

- It is important that drill additives used be non-toxic and biodegradable, and that sumps be used for disposal of only inert drilling cuttings, not any other substances. Drill cuttings contains hydrocarbon based drill additives such as linseed soap as proposed on Page 4 of the *Exploration/Remote Camp Supplementary Information Request*, should be transported to a facility that is approved for the treatment and disposal of industrial wastes. Additionally, "overflow from the settling tanks will run off and percolate into local soils" as proposed should be prohibited as the overflow may be contaminated with hydrocarbons.

3. AIR QUALITY

The Government of Nunavut is signatory to the *Canada-Wide Standards (CWS) for Dioxins and Furans*, and the CWS *for Mercury Emissions*. We DOE therefore request the proponent ensures incineration emissions comply with the CWS by implementing the following recommendations.

For a camp of 10 to 50 people, the proponent shall apply appropriate technologies to ensure complete combustion of wastes. The DOE recommends the use of a dual chamber, forced-air incinerator. The proponent proposed to use a forced air incinerator, but due to lack of information regarding incinerator specifications, it is unclear if the incinerator will meet the standards. The

proponent should clarify this. Additionally, the proponent shall implement a 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. Furthermore, hazardous wastes should not be managed through burning or incineration.

The DOE thanks the NWB for giving us the opportunity to review and provide comments on the High Lake project water license renewal application. Please contact us if you have any further questions or comments.

Yours sincerely,

Original signed by

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