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Department of Environment

Ministère de l'Environnement

March 10, 2008

Richard Dwyer Licensing Administrator Nunavut Water Board

via Email to: licensingadmin@nunavutwaterboard.org

RE: NWB FILE # 2BE-MCG0608 – 5050 Nunavut Limited – McGregor Lake Project: MIE and Bear Valley Property

Dear Mr. Dwyer:

The Government of Nunavut, Department of Environment (DOE) has reviewed the Water Licence Renewal Application from 5050 Nunavut Limited pertaining to the McGregor Lake Project 60-100 kilometers South of Kugluktuk, and has the following comments and recommendations to make.

## Abandonment & Restoration (A&R) Plan

Based on the DOE's *Environmental Guideline for Site Remediation*, the DOE has the following recommendations to make:

## Garbage disposal

For a camp of more than 10 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 Standard for Mercury Emissions. 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 nonfood waste items suitable for storage and subsequent transport and disposal or recycling).





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 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 to the Nunavut Impact Review Board as part of the annual report.

## Final Inspections:

Final inspections of the entire site should be conducted by the proponent and lead agency to make sure that all areas of the site have been reclaimed as much as possible to its previous condition. Soil samples and pictures before and after the project would make this process easy on the proponent and leading agencies involved in determining areas of concern.

The DOE 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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