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Department of Environment

Ministère de l'Environnement

February 27, 2009

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board

via Email to: licensing@nunavutwaterboard.org

RE: NWB FILE # 2BE-MOU0608 – MOUSE LAKE URANIUM EXPLORATORY PROJECT – RENEWAL APPLICATION

Dear Ms. Beaulieu:

The Government of Nunavut, Department of Environment (DOE) has reviewed the water license renewal application from the UNOR Inc. for the Mouse lake Project for base uranium exploration approximately 100 km south of Kugluktuk. The DOE believes that the Proponent's request to have a daily water consumption of up to 65 cubic meters and an increase number of drilling operations are reasonable. Based on the *Environmental Protection Act* and the *Wildlife Act*, the DOE has the following comments to make regarding Spill Contingency Plan, Camp Incinerator, and Abandonment and Restoration Plan.

A. Spill Contingency Plan

Based on the Government of Nunavut *Spill Contingency Planning and Reporting Regulations*, and *Guideline for the General Management of Hazardous Waste in Nunavut*, DOE has the following recommendations to make:

- The DOE monitors the movement of hazardous wastes including waste fuel, from generators, carriers to receivers, through a tracking document (Waste Manifest). A Waste Manifest must accompany all movements, and all parties must register with the DOE. This registration can be done by contacting Rob Eno at (867) 975-7748 or reno@gov.nu.ca.
- The spill plan should include a site map that is intended to illustrate the facilities relationship to other areas that may be affected by the spill. 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 any nearby bodies of water.



- The NWT-Nunavut spill report form can be obtained from DOE website (<http://www.gov.nu.ca/env/applications.shtml>). This form should be included in the spill plan, and the proponent is required to use this form for reporting to the Spill Line in the case of spills. Additionally, the proponent is advised to enter spill information electronically in the form in the case of spills so the information is legible to regulators inspecting the spill.

B. Camp Incinerator

The Government of Nunavut is a signatory to the *Canada-Wide Standards (CWS) for Dioxins and Furans*, and the *Canada-Wide Standards for Mercury Emissions*. The DOE therefore has the following comments to make.

- For camps of 10 to 50 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. Burning of wastes in a burn barrel as indicated in the licence application is unacceptable. The proponent shall make determined efforts to achieve compliance with the CWS. 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.
- 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.

C. Abandonment & Restoration Plan for Uranium Exploration

- Uranium or any core storage areas should be located at least 100 meters from the high waterline of all water bodies.

The DOE thanks the NWB for the opportunity to review and provide comments on the renewal application for Mouse Lake Project. Please contact us if you have any further questions or comments.

Yours sincerely,

Original signed by

Dee Karadag
Coordinator/Scientist Environmental Assessment
Department of Environment



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