Affaires autochtones et Développement du Nord Canada

Water Resources Nunavut Regional Office P.O. Box 100 Iqaluit, NU, X0A 0H0

NWB file - Votre référence 2BE-MRC - New

AANDC file - Notre référence IQALUIT - # 521185

April 5, 2012

Phyllis Beaulieu Manager of Licensing Nunavut Water Board P.O. Box 119 Gjoa Haven, NU, X0A 1J0

# Re: Water Licence No. 2BE-MRC, New Application – Marce Project – Anconia Resources Corporation – Kivalliq Region

Aboriginal Affairs and Northern Development Canada (AANDC) has performed a review of Anconia Resources Corporation's new application for water licence number 2BE-MRC – Marce Project, located in the Kivalliq region. The Nunavut Water Board distributed the application for comment on March 6, 2012. The following comments are provided pursuant to AANDC's mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

In conducting this review, I have referred to all documents on the Nunavut Water Board's FTP site as it relates to 2BE-MRC. Attached is a Technical Review Memorandum for your consideration.

Please feel free to contact me should you have any questions or comments. I can be reached at 867.975.4566 or by email at <a href="mailto:Andrea.Cull@aandc-aadnc.gc.ca">Andrea.Cull@aandc-aadnc.gc.ca</a>.

Sincerely,

Originally signed by

Andrea Cull Pollution Policy Specialist, AANDC

Cc: Murray Ball, Manager of Water Resources, AANDC Andrew Keim, A/Manager of Field Operations, AANDC



# **Technical Review Memorandum**

**To:** Phyllis Beaulieu – Manager of Licensing, Nunavut Water Board **From:** Andrea Cull – Pollution Policy Specialist, Aboriginal Affairs and

Northern Development Canada

# Re: Water Licence No. 2BE-MRC, New Application – Marce Project – Anconia Resources Corporation – Kivalliq Region

### **Background**

Anconia Resources Corporation *"the Proponent"* has submitted an application for a new water licence number 2BE-MRC – Marce Project, located in the Kivalliq region. The Proponent is interested in conducting early-stage exploration work.

A temporary exploration tent camp suitable for 20 people will be constructed on the mineral claims area. There will be between 10 and 15 people on site at one time for approximately 30 to 75 days. A chartered fixed wing and a helicopter will be used as transportation on and off of the site.

If the early stage of exploration is successful then additional work could include geological surveys, geological mapping, prospecting and diamond drilling (exploration activities are results driven).

# **Recommendations/Comments**

On behalf of the AANDC Water Resources Division the following comments/ recommendations are provided for the Board's consideration,

## Drilling

Prior to the commencement of diamond drilling the Proponent shall submit to the Inspector proposed drill targets on a 1:50,000 scale map with the coordinates and map datum.

If drilling extends through the permafrost base, AANDC recommends the Nunavut Water Board request the Proponent to provide the drill locations and depth of the permafrost in their annual report to the Board.

# Spill Contingency Plan

The Spill Contingency Plan should make reference to the Nunavut Spill Report Line and include a copy of the Nunavut Spill Report Form. This form can be obtained from the Nunavut Water Board public registry at <a href="http://www.nunavutwaterboard.org">http://www.nunavutwaterboard.org</a>.



Please note that the 24-hour Spill Report Line telephone number is 867.920.8130 and facsimile number is 867.873.6924. Furthermore, AANDC requests the Proponent report all spills to the Manager of Field Operations/AANDC, by phone at 867.975.4295 and by fax at 867.975.6445, as well as the Nunavut Spill Report Line.

#### Waste

#### **Hazardous Waste**

AANDC recommends that Hazardous waste/waste oil materials and hydrocarbon contaminated soil stored on-site should be clearly labeled with labels visible under all conditions and in all seasons. This recommendation is intended to prevent possible damage or misplacement of the containers.

AANDC recommends that the Proponent remove all hazardous materials/ waste oil from the site on a regular basis to prevent the over accumulation of these materials. Hazardous waste/waste oils must be disposed of at an approved facility outside of the Territory of Nunavut (no known facilities within Nunavut). All transfer of this type of waste must be in accordance with the GN's "Guideline for General Management of Hazardous Waste - January, 2002". In addition hazardous wastes should be stored within a lined secondary containment structure to prevent any off site impacts (other secured structures would also be acceptable).

AANDC recommends that the Proponent be required to submit copies of all manifest forms related to the transport of hazardous waste/waste oil as part of the Annual Report for this site.

## **Greywater and Drilling Wastes**

AANDC recommends that all sumps for the disposal of grey water or drilling wastes shall be located a minimum distance of 31 metres from any water body and shall be managed to ensure that there are no adverse effects to the quality, quantity and flow of water. Furthermore, all sumps shall be backfilled and contoured to match the surrounding landscape prior to the end of the project.

#### Incineration

#### No Open Burning

According to Environment Canada's (EC) Technical Document for Batch Waste Incineration Guidelines, there should be no open burning of plastics, wood treated with preservatives, electrical wire, Styrofoam, asbestos or



painted wood. This is to prevent the deposition of waste materials from incomplete combustion and/or leachate from contaminated ash residues from affecting any surrounding waters.

#### Incineration

AANDC recommends the Nunavut Water Board consider specifying a mode of incineration. This would provide greater clarity to the Proponent, and ensure waste is incinerated appropriately as to avoid possible leaching into surrounding waters from improperly burnt ash, and the excessive deposition of particulate matter into watersheds which could adversely affect water quality. For camps of 10 to 50 people or greater, it is generally advised to use a dual chamber forced-air incinerator or a dual chamber controlled-air incinerator. The new proposed exploration camp will house 10-15 people

EC's Technical Document for Batch Waste Incineration Guidelines recommends that a facility incinerating more than 26 tons of waste per year should do so with a dual chamber, controlled air incinerator. 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 requiring disposal.

#### Additional Comments

AANDC has no additional comments on the water licence application and suggests that a renewal/amendment of water licence 2BE-MRC with the existing terms and conditions would be appropriate.

Prepared by Andrea Cull

Cc: Murray Ball, Manager of Water Resources, AANDC Andrew Keim, A/Manager of Field Operations, AANDC

