



Environment  
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January 10, 2002

Our File: 4705 037

Rite Becker  
Licensing Administrator  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, NU X0B 1J0

By Facsimile: (867) 360-6369

**Re: Comments on Application Water License NWB2TAK0002 - Kennecott Canada Exploration Inc.- Establishment of Camp, Napaktulik Lake, Kitikmeot Region, Nunavut.**

Kennecott Canada Exploration Inc. wishes to establish a camp near Napaktulik Lake. The camp will accommodate between +/- 70 people for about 10,000 person days. The start date is February 01, 2002 and to be completed February 01, 2004. The following recommendations have been made in regards to Environment Canada mandated responsibilities for the enforcement of the *Canadian Environmental Protection Act* (CEPA), section 36 of the *Fisheries Act*, the *Canadian Wildlife Act*, and the *Migratory Birds Convention Act*.

The proponent neglected to:

- indicate on a map if stream or rivers are in the vicinity of the proposed roads;
- state that "all spills" are to be documented and reported to the NWT Spill line (867) 920-8130;
- provide an adequate spill contingency plan;
- provide a list of all hazardous materials that may be used during the program;
- indicate how heavy equipment are to be transported to the site;
- indicate if heavy equipment is to be inspected regularly for leaks;
- provide a map indicating the locations of land-based sumps in relation to water;
- include location of fuel storage in relation to water for aircraft, camps and drilling uses.

Environment Canada requests that the proponent clarify what type of treatment will be employed for the handling of camp sewage. There are two conflicting treatments processes proposed one describes the use of a digester and the second refers to the use of a sump.

Environment Canada recommends the proponent should re-evaluate the size of the sump to ensure that adequate volume is available without over topping the structure. The dimensions provided in the water license application indicate the size of the sump for waste water will be extremely undersized in comparison to the daily use. Daily use of 100L/per day/per person with a maximum of +/- 70 people a sump of 2mx2mx.6m depth will reach capacity fairly quickly.

The following conditions should be applied throughout all phases of the project.

- The proponent shall ensure that any chemicals, fuel or wastes associated with the proposed project do not enter waters frequented by fish. All sumps, spill basins and fuel caches should be located in such a manner that the contents do not enter a waterbody.

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- EC encourages proponents, when storing barrelled fuel at a location, to use a secondary containment rather than relying on "natural depressions". Self supporting insta-berms are available from various suppliers within Canada.
- No disturbance of the bed or banks of any definable watercourse is permitted. Special efforts must be made to avoid bed and bank disturbance during the spring.
- Ensure the treatment of hazardous and solid wastes at an appropriate disposal facility ie. Yellowknife or Rankin Inlet;
- Environment Canada recommends the use of an approved incinerator.
- The permittee shall not erect camps or store material on the surface ice of streams or lakes.

Please do not hesitate to contact me at (867) 975-4639 with any questions or comments regarding the foregoing.

Yours truly,



Lawrence Ignace  
Environmental Assessment Specialist

cc: Paula Pacholek (Environmental Assessment Coordinator, EPB)