



ᐱᐃᐃᐃᐃᐃᐃᐃᐃ

Avatiligiyiit

Department of Environment

Ministère de l'Environnement

Feb. 7, 08

Phyllis Beaulieu  
Manager of Licensing  
Nunavut Water Board

**Via e-mail to:** [licensing@nunavutwaterboard.org](mailto:licensing@nunavutwaterboard.org)

**RE: NWB FILE # 2BE-NTP – BAYSWATER URANIUM CORP. – NORTH  
THELON URANIUM EXPLORATION PROJECT**

Dear Ms. Beaulieu:

The Government of Nunavut, Department of Environment (DOE) has reviewed the water license application for the North Thelon uranium exploration project 155 km northwest of Baker Lake, submitted by Bayswater Uranium Corp. Based on DOE's mandate under the *Environmental Protection Act*, DOE has the following comments to make.

**Drill Fluids**

The proponent states that "care will be taken to ensure that drill fluids are not discharged directly into any lake or water coarse. This may include the construction of hand-built retaining structures, ditching and tanks to capture drilling fluids". From this statement it is unclear what the final fate of drill cuttings would be, particularly if sediments are considered radioactive ( $>1\mu\text{Sv/h}$  at 1 m). The applicant should provide a plan for the safe disposal of radioactive and contaminated drill cutting. Drill sumps should only be used for inert drilling fluids; these should be properly closed out.

**Core Storage**

Core storage areas should be located at least 100 meters from the high waterline of all water bodies. Gamma radiation levels of a long-term core storage area should not be greater than  $1.0\mu\text{Sv}$ , and should never exceed  $2.5\mu\text{Sv}$ . Instruments that measure radiation in counts per second should be converted to  $\mu\text{Sv}$ .

**Spill Contingency Plan**

Based on DOE's *Spill Contingency Planning and Reporting Regulations*, and the *Contingency Planning and Spill Reporting in Nunavut: a Guide to the New Regulations*, DOE recommends the following be implemented:

- Bayswater suggest that they will rely on contactors and sub-contractors to provide assistance to the on-site coordinator in the event of a spill; DOE believes that the spill plan should include a list of local contractors and specialists whom may realistically be called upon to assist.
- The spill plan rightly includes a contact list for emergency services and government agencies who may be contacted in the event of a spill. The contact information for the GN Department of Environment is wrong and should be as follows:

Robert Eno  
 Manager Pollution Control  
 Department of Environment  
 Government of Nunavut  
 Tel: (867) 975 7748

### **Abandonment & Restoration Plan**

DOE has the following comments and recommendations to make:

- Waste oil and waste fuel should be removed and returned for recycling when the land use activity is completed. Alternative methods of disposal that provide an equivalent level of environmental protection will be considered on a case by case basis.
- Soil contaminated by fuel (e.g., soils under an old storage tank) should be treated on site or removed to an approved disposal site and replaced with new soil. The proponent is referred to DoE's *Environmental Guideline for Site Remediation*.

### **Air Quality**

The proponent intends to manage garbage at the site through incineration. The proponent should be aware that the Government of Nunavut is a signatory to *Canada-wide Standard* (CWS) for dioxins and furans and the CWS for mercury. The GN therefore recommends the following be implemented to ensure CWS compliance.

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 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. Hazardous wastes management through burning or incineration is not recommended.

### **The Canadian Heritage Rivers System**

The project area is located in close proximity to the Thelon Canadian Heritage River. During the summer months the Thelon River is frequented by recreational Canoeists providing much needed tourism dollars to Nunavut communities.

Please note that the Canadian Heritage Rivers System (CHRS) is Canada's national program for freshwater conservation. In Nunavut (as elsewhere in Canada), it is a cooperative program between the governments of Canada and the Government of Nunavut (other provincial and territorial governments for the rest of Canada). The objectives of the program are to give national recognition to Canada's outstanding rivers and to ensure long-term management that will conserve their natural, cultural and recreational values for the benefit and enjoyment of Canadians, now and in the future.

Recognizing the voluntary nature of heritage river stewardship, DOE requests that activities conserve and protect the heritage resources along the river and within the watershed management zone, and to the extent possible do not detract from the recreational use and enjoyment of the river as described in the Thelon Heritage River Management Plan. Therefore, we ask that if NWB approves the project proposal within the management areas of the Heritage Rivers that it insures, via recommendations to permitting authorities, that the proponent respects the values of the Heritage Rivers and does not engage in any activity that would interfere or otherwise detract from the experience of tourists and Nunavummiut using the Heritage Rivers now and in the future. The Management Plan for the Thelon River can be obtained at DOE by contacting Richard Wyma at [rwyma@gov.nu.ca](mailto:rwyma@gov.nu.ca) or (867) 975-7724.

DOE thanks NWB for the opportunity to provide comments on the Bayswater Uranium Corp. water license application. Please contact us if you have further questions.

Yours sincerely,

***Original signed by***

Mike Atkinson  
Manager Environmental Assessment and Land Use  
Environmental Protection Service  
Department of Environment

