

March 6, 2008
Richard Dwyer
Licensing Administrator
Nunavut Water Board

via Email to: licensingadmin@nunavutwaterboard.org

RE: NWB FILE # 2BE-PEL0507 – DIAMONDS NORTH RESOURCES LTD. – AMARUK PROJECT

Dear Mr. Dwyer:

The Government of Nunavut, Department of Environment (DOE) has reviewed the renewal water license application for the Amaruk project proposal from Diamonds North Resources Ltd. for conducting diamond exploration to the south-southeast of Kugaaruk, and has the following comments and recommendations to make.

Spill Contingency Planning

Based on the Government of Nunavut *Spill Contingency Planning and Reporting Regulations* and *A Guide to the Spill Contingency Planning and Reporting Regulations*, the DOE has the following comments to make:

- A site map should be included. It is intended to illustrate the site in relation to other areas that may be affected by the spill, and the scale of the map should be large enough to include the site, nearby facilities, roads, culverts, drainage patterns, and any nearby bodies of water.
- The fuel and chemical storage plan is insufficient. It should be updated to include the following points: chemical names, volumes, and weights of the contaminants. To prevent spreading in the event of a spill, fuel and chemicals should be stored in a natural depression a minimum distance of 90 feet from all streams, preferably in an area of low permeability. All fuel storage containers should be situated in a manner that allows easy access and removal of containers in the event of leaks or spills.
- The DOE, Environmental Protection Service (EPS) monitors the movement of hazardous waste, from the generator, carrier to the final disposal, through a tracking document (Waste Manifest). A Waste Manifest must accompany all movements, and all parties must register with the EPS. There is no mention of this procedure in the spill plan.

Garbage Disposal

Medium Camps 10-50 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. 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. 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 non-food waste items suitable for storage and subsequent transport and disposal or recycling).
- 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.

Abandonment and Restoration

To ensure proper restoration of the project site after project closure, DOE recommends the following be incorporated in an abandonment & restoration (A&R) plan.

- The A&R Plan should be updated to incorporate the following: the proponents contact information, as well as emergency contact information. The proponent may want to include: Owner and site supervisor contact names, addresses, and numbers.
- 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

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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 the NWB for the opportunity to provide comments on this Amaruk Project water license renewal application. Please contact us should you have further questions.

Yours sincerely,

Original signed by

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