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Department of Environment

Ministère de l'Environnement

June 4, 2007

Phyllis Beaulieu  
Manager of Licensing  
Nunavut Water Board

**via Email to:** [licensing@nunavutwaterboard.org](mailto:licensing@nunavutwaterboard.org)

**RE: NWB FILE # 2BE-SCH – FORUM URANIUM CORP. – SCHULTZ LAKE PROJECT**

Dear Ms. Beaulieu:

The Government of Nunavut, Department of Environment (DOE) has reviewed the water license application from Forum Uranium Corp. for the Schultz Lake project for conducting uranium exploration approximately 30 km west of Baker Lake. The DOE believes the project will not result in significant adverse effects although the potential for negative environmental impacts exists. Based on the *Environmental Protection Act*, the DOE has the following comments to make regarding waste management, abandonment & restoration, and heritage rivers.

**1. WASTE MANAGEMENT**

***Spill Contingency Plan***

Based on the DOE *Spill Contingency Planning and Reporting Regulations*, *Contingency Planning and Spill Reporting in Nunavut: a Guide to the New Regulations*, and *Guideline for the General Management of Hazardous Waste in Nunavut*, we have the following comments and recommendations to make:

- Page 9 of the *Spill Contingency Plan* stated that the proponent will “contact Federal and Territorial regulatory agencies to identify appropriate disposal methods before disposing of contaminated material. The government does not provide disposal instructions for spilled and/or contaminated materials. It is the proponent’s responsibility to develop a complete plan which addresses the steps to be taken from the start of the spill, up to and including the final clean up and disposal. Regulatory agencies such as DOE can review the final plan to assess its adequacy and provide advice at that time.

- It is unclear whether or not the contact number provided is a 24-hour number. The 24-hour number for the persons responsible for activating the contingency plan is required as this ensures the employee discovering the spill can activate a response and provides a 24-hour point of contact for the authority investigating the spill.
- 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. Large fuel caches in excess of 20 drums should be inspected daily.
- The DOE monitors the movement of hazardous wastes from generators, carriers to receivers, through a tracking document (Waste Manifest). A Waste Manifest must accompany all movements, and all parties must register at DOE with Robert Eno at [reno@gov.nu.ca](mailto:reno@gov.nu.ca) or (867) 975-7748.

### ***Camp Incinerator***

The Government of Nunavut is signatory to *Canada-Wide Standards (CWS) for Dioxins and Furans*, and *Canada-Wide Standards for Mercury Emissions*. The DOE therefore requests the proponent ensures incineration emissions comply with the CWS by implementing the following recommendations.

For a camp 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. 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. 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. Furthermore, hazardous wastes such as waste oil managed via incineration is prohibited.

## **2. ABANDONMENT & RESTORATION**

Based on the DOE's *Guideline for Contaminated Site Remediation*, we recommend the following:

- Drill holes that encounter uranium mineralization with a content greater than 1.0% over a length of more than 1 meter with a meter-percent concentration greater than 5% should be sealed by cementing over the entire mineralization zone; this should be at least 10 meters above and below each mineralization zone.
- Drill holes should be sealed by cementing the upper 30 meters of the bedrock or the entire depth of the holes; whichever is less.
- Drill cuttings with a uranium concentration of greater than 0.05% should be disposed of down the drill hole and sealed.
- 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  $\mu\text{S}$ .
- 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 pictures before and after the project would make this process easy on the proponent and leading agencies involved in determining areas of concern.

## **3. THE CANADIAN HERITAGE RIVERS SYSTEM**

This project is in close proximity to a Canadian Heritage River, namely Thelon River. The DOE therefore has the following comments to make.

The Canadian Heritage Rivers System (CHRS) is a Canada's national program for freshwater conservation, and management plans detailing how their heritage values will be protected have been lodged with the CHR Board; the plans can be obtained at: [http://www.nunavutparks.ca/bulletin\\_board/publications.cfm](http://www.nunavutparks.ca/bulletin_board/publications.cfm)  
In Nunavut (as elsewhere in Canada), it is a cooperative program between the Government of Canada and the Government of Nunavut. 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, the DOE requests that activities conserve and protect the heritage resources along the river, and to

the extent possible do not detract from the recreational use and enjoyment of the river. Where possible the proponent should be required to locate camps or facilities outside the one kilometer buffer from the river, as outlined in the Heritage River Management Plan. Additionally the DOE requests that the INAC takes extra measures to ensure that proper monitoring, inspection and enforcement of permit requirements occurs.

The DOE thanks the NWB for giving us the opportunity to review and provide comments on the Schultz Lake water license application. Please contact us if you have any further questions or comments.

Yours sincerely,

***Original signed by***

Helen Yeh  
Environmental Assessment Coordinator  
Department of Environment  
Government of Nunavut  
P.O. Box 1000, Stn. 1360  
Iqaluit, Nu X0A 0H0  
PH: (867) 975-7733  
FX: (867) 975-7747  
EM: hyeh@gov.nu.ca