



**Environment Environnement
Canada Canada**

Environmental Protection Operations
Qimugjuk Building 969 P.O. Box 1870
Iqaluit, NU X0A 0H0
Tel: (867) 975-4639
Fax: (867) 975-4645

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Our file: 4703 001 006

Richard Dwyer
Licensing Trainee
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0E 1J0
Tel: (867) 360-6338
Fax: (867) 360-6369

Via email at licensingtrainee@nwb.nunavut.ca

RE: NWB2SIS – Cogema Resources Inc. – Sissons Project Spill Contingency and Abandonment and Restoration Plans

On behalf of Environment Canada (EC), I have reviewed the information submitted with the above-mentioned application. The following specialist advice has been provided pursuant to Environment Canada's mandated responsibilities for the enforcement of the *Canadian Environmental Protection Act*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

Environment Canada recommends that the following terms/condition be incorporated in the Abandonment and Restoration (A&R) Plan for the Sissons Project and the Kiggavik Project:

- The proponent shall not deposit, nor permit the deposit of any fuel, chemicals, wastes or sediment into any water body. According to the Fisheries Act, Section 36(3), the deposition of deleterious substances of any type in water frequented by fish, or in any place under any conditions where the deleterious substance, or any other deleterious substance that results from the deposit of the deleterious substance, may enter any such water, is prohibited.
- The proponent shall backfill all sumps used for the deposit of camp wastes, including camp black and grey water, and drill waste. Sumps should be contoured to match the surrounding environment.
- The final A&R Plan should outline plans for the removal of the freshwater intake and associated piping from the freshwater source, if applicable. Any storage tanks should also be removed from the site.
- Cogema should indicate if there is any contaminated soil present at the project locations. Any soils contaminated with hydrocarbons or other contaminants should receive proper treatment and disposed of at an approved facility. The A&R Plan should provide details regarding contaminants (type, volume and concentration) and disposal methods.
- The A&R Plan states that any radioactive core will be dumped at the site of two filled-in surface trenches that were cut in the early 1980's. These trenches were backfilled by Cogema in 2003. Environment Canada requests clarification regarding whether the overburden in the trenches will be removed and the radioactive core buried and capped with the removed overburden, or if the core will simply be left piled at surface.
- Information should be provided in the A&R Plan regarding plans for the removal, combustion, burial, etc... of existing infrastructure on site, including fencing, buildings, core racks, etc...
- Any ash remaining from the incineration of combustible material should be raked for non-combustible items (such as nails) and any such material should be removed from the site.



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- The proponent shall ensure that all hazardous materials, including waste oil, receive proper treatment and disposal at an approved facility.
- Environment Canada recommends the use of an approved incinerator for the disposal of combustible material.
- Any spills occurring as a result of A&R activities shall be reported immediately to the 24-hour Spill Line at (867) 920-8130.
- Section 35 of the *Migratory Bird Regulations* states that **no person shall deposit nor permit to be deposited, oil, oil wastes or any other substance harmful to migratory birds in any waters or any area frequented by migratory birds.** Therefore, Environment Canada recommends that sumps be backfilled or made otherwise inaccessible to migratory birds prior to their arrival in spring and that the proponent ensure that all spills are thoroughly cleaned-up.
- Environment Canada recommends that all activities be conducted outside the migratory bird breeding season, which extends from approximately 15 May to 1 August. These dates are approximate, and if active nests (i.e., nests containing eggs or young) are encountered outside of these dates, the proponent should avoid the area until nesting is complete (i.e., the young have left the nest). Paragraph 6(a) of the *Migratory Bird Regulations* states that **no one shall disturb or destroy the nests of migratory birds.**

Environment Canada recommends that the following terms/condition be incorporated in the Spill Contingency Plan for the Sissons Project and the Kiggavik Project:

- If the decision is made to resume activities at these sites, the proponent shall ensure that a spill contingency plan is filed with the Nunavut Water Board for review and approval prior to the start of any work.

If there are any changes in the proposed project, EC should be notified, as further review may be necessary. Please do not hesitate to contact me with any questions or comments with regards to the foregoing at (867) 975-4639 or by email at colette.spagnuolo@ec.gc.ca.

Yours truly,

Original signed by

Colette Spagnuolo
Environmental Assessment / Contaminated Sites Specialist

cc: (Stephen Harbicht, Head, EA North, Environment Canada, Yellowknife)