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## Avatiligiyiit

Department of Environment

Ministère de l'Environnement

August 25, 2008

Phyllis Beaulieu  
Manager of Licensing  
Nunavut Water Board

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

**RE: NWB FILE # 2BE-SNN0508 – Stornoway Diamond Company – Aviat Exploration Project**

Dear Ms. Beaulieu:

The Government of Nunavut, Department of Environment (DOE) has reviewed the water license renewal application from Stornoway Diamond Company Aviat exploration project located approximately 50 km west of Igloolik and has the following comments and recommendations to make based on the *Environmental Protection Act* regarding spill contingency and abandonment & restoration.

## **1. 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*, DOE has the following comments and recommendations to make:

- The DOE contact number is inaccurate and should be updated (Section 5.4 of the Spill Contingency Plan). The correct numbers are (867) 975-7700 for general reception or (867) 975-7748 for the Manager of Pollution Control.
- Contact information for on-site spill response personnel should be updated in the spill plan once the information is available, and should include a 24-hour contact 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.
- A site map that is intended to illustrate the facilities relationship to other areas that may be affected by the spill should be included in the Spill Contingency Plan (SCP). The map should be to scale and be large enough to include the location of your facility, drainage patterns, and any nearby bodies of water.
- The SCP should contain an inventory and the location of response and clean up equipment available to implement the plan. This includes your equipment as well as any to be used by another person responding to the spill on your behalf. Although there is mention of spill kits there is no mention of what the spill kits contain, e.g. booms, absorbent pads/sheets, disposable gloves, sorbent etc.
- The SCP does not outline any disposal/treatment techniques for contaminants (e.g. contaminated soils); however, states that Federal and Territorial regulatory agencies will be contacted in order to “identify appropriate disposal methods before disposing of contaminated material” (See section 6.3 of the SCP). The DOE advises the proponent that the role of the regulatory agencies is not to foreclose how the disposal is done, but to ensure that clean up and disposal/treatment occurs in an approved and authorized

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manner. The proponent should revise the Spill Contingency Plan to outline disposal/treatment techniques for contaminated material such as soils. These plans may include include location of disposal sites approved to accept wastes, means of storage prior to disposal and other approvals required. The goal of the treatment and/or disposal of the contaminant is to ensure that there is no longer a threat to the environment. For further information, the proponent is referred to DoE's *Environmental Guideline for Site Remediation* and *A Guide to Spill Contingency Planning and Reporting*.

- The NWT-Nunavut spill report form has been updated, and can be obtained from DOE website (<http://www.gov.nu.ca/env/applications.shtml>). This form should be included in the spill plan, and proponents are required to use this form for reporting to the Spill Line in the case of spills. Additionally, the proponent is advised to enter spill information electronically in the form in the case of spills so the information is legible to regulators inspecting the spill.
- The DOE monitors the movement of hazardous wastes, from generators, carriers to receivers of the wastes, through the use of a tracking document known as a Waste Manifest. A Waste Manifest must accompany all movements and all parties must register with DOE. This registration can be done at DOE by contacting Robert Eno at (867)975-7748 or [reno@gov.nu.ca](mailto:reno@gov.nu.ca).

## **2. Abandonment & Restoration Plan**

- Final inspections of the entire site should be conducted by the proponent and lead agencies 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 the leading agencies involved in determining areas of concern.

The GN thanks NWB for the opportunity to provide comments on Stornoway Diamond Company's water license application. Please contact us if you have further questions.

Yours sincerely,

**Original signed by**

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