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Department of Environment

Ministère de l'Environnement

June 20, 2008

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board

via Email to: licensingadmin@nunavutwaterboard.org

RE: **NWB FILE # 2BE-THE0608 – Titan Uranium Incorporated – Thelon Uranium Exploration Project**

Dear Ms. Beaulieu:

The Government of Nunavut, Department of Environment (DOE) has reviewed the water license application from Titan Uranium Incorporated for the Thelon Exploration Project and camp operation approximately 150 km northwest of Baker Lake, 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

The subsequent recommendations and comments are 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*. Consequently; DOE recommends the following be included in the Spill Contingency Plan (SCP):

- The name, job title and **24 hour telephone number** for the persons responsible for activating the contingency plan. 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.
- Please be advised that the telephone numbers for the GN-Department of Environment is (867) 975-7700 and the Manager Pollution Control and Air Quality (867) 975-7748. Please update the contact list under section 6.5 in the SCP.
- 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”. The DOE advises the proponent that the role of the regulatory agencies is not to instruct how the disposal is done, but to ensure that clean up and disposal/treatment occurs in an approved and authorized manner. The proponent should revise the Spill Contingency Plan to outline details including, but limited to the following: disposal/treatment techniques, location of disposal sites approved to accept wastes, and means of storage prior to disposal. For further information, the proponent is referred to DOE’s *Environmental Guideline for Site Remediation* and *A Guide to Spill Contingency Planning and Reporting*.

2. Abandonment & Restoration Plan

Final Inspections:

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

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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.

Drill Sumps

The sumps should only be used for inert drilling fluids, not any other materials or substances. The sumps should be properly closed out.

Incineration

The Government of Nunavut is a signatory to the *Canada-Wide Standards for Dioxins and Furans*, and *Canada-Wide Standards for Mercury Emissions*. For incineration of wastes, DOE therefore has the following comments to make regarding emissions from incineration.

For a camp of greater than 10 but less than 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.

Grouting

If groundwater (e.g. artesian well) is encountered during drilling, the entire length of the hole should be cemented (grouted).

The DOE thanks NWB for the opportunity to provide comments on the Titan Uranium Incorporated's water license application. Please contact us if you have further questions.

Yours sincerely,

Original signed by

Froeydis Reinhart
Scientist/Coordinator, Environmental Assessment
Department of Environment
Government of Nunavut

