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## Avatiligiyyit

Department of Environment

Ministère de l'Environnement

September 18, 2009

Phyllis Beaulieu  
Manager of Licensing  
Nunavut Water Board

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

**RE: NWB File # 2BE-TOR — North Arrow Minerals Inc. Torp Lake Project —  
New Water License Application**

Dear Ms. Payette:

The Government of Nunavut, Department of Environment (DOE) has reviewed North Arrow Minerals Torp Lake water license application. Based on DOE's mandate under the *Environmental Protection Act*, we have the following comments and recommendations to make.

## 1. GENERAL

The proponent states in their detailed project description that they will be storing water in a 1000 L drum in the dry, however, in the *Exploration/Remote Camp Supplementary Questionnaire*, they state that they will not be storing water on site. DOE would like the proponent to clarify this.

## 2. INCINERATION

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 Emissions*. 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 annually.

### **3. SPILL CONTINGENCY PLANNING**

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.

### **4. ABANDONMENT AND RESTORATION**

The proponent should include any emergency contact information (fire, police, hospital, and clean up specialists).

Hazardous materials stored on-site should be marked so they will be visible under all conditions, in all seasons. This recommendation is intended to help prevent possible injuries to camp personnel and/or damage to the containers. Unless otherwise specified by the land use inspector or license -issuing agency, all hazardous materials should be removed from the site upon completion of the activity. All hazardous waste should be accompanied by hazardous waste manifests with the appropriate information (Generator number, carrier number, and receiver number).

Drill holes should be backfilled or capped at the end of project. The sumps should only be used for inert drilling fluids, not any other materials or substances. The sumps should be properly closed out at the end of a project.

Drilling additives shall not be used in connection with holes drilled through lake ice unless they are re-circulated or contained such that they do not enter the water, or demonstrated to be non-toxic.

GN-DOE thanks the NWB for giving us the opportunity to review and provide comments on the North Arrow Mineral's Torp Lake water license application. Please contact us if you have any further questions or comments.

Yours sincerely,

***Original signed by***

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