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Department of Environment

Ministère de l'Environnement

Mar. 7, 08

Richard Dwyer
Licensing Administrator
Nunavut Water Board

via Email to: licensingadmin@nunavutwaterboard.org

RE: NWB # 3BC-HLC0406 – MATRIX AVIATION SOLUTIONS INC. –HOPE LAKE CAMP PROJECT

Dear Mr. Dwyer:

The Government of Nunavut, Department of Environment (DOE) has reviewed a renewal water license application for the Hope Lake camp project from Matrix Aviation Solutions Inc. (proponent). A new camp approximately 60 km southwest of Kugluktuk will be constructed and operated by the proponent, and will be used as a base by a mineral exploration company. Based on DOE's *Environmental Protection Act*, we have the following comments to make regarding spill contingency planning, and incineration of wastes.

A. SPILL CONTINGENCY PLAN:

Based on DOE's *Spill Contingency Planning and Reporting Regulations*, and *Contingency Planning and Spill Reporting in Nunavut: a Guide to the New Regulations*, DOE recommends the following:

- The name, job title and 24 hour telephone number for the persons responsible for activating the contingency plan should be provided in the spill 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. It is not clear whether the contact numbers provided in the spill plan are 24-hour numbers.
- The DOE contact numbers listed in the spill plan are inaccurate. The correct numbers for general reception and the Manager of Pollution Control at DOE are (867) 975-7700 and (867) 975-7748, respectively.
- Aside from fuel, name and quantity of chemicals (i.e., drill additives) normally stored on site should also be outlined in the spill plan.

- Page 11 of the spill *Contingency Plan* indicates that the crew would phone the 24 hour Spill Line to obtain disposal instructions in the case of spills. The Spill Line 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. Regulatory bodies can, and have, provided information and advice in emergency situations, however, these agencies should not be included in a spill plan as routine advisors.
- A site map that is intended to illustrate the facilities relationship to other areas that may be affected by the spill. The map should be to scale and be large enough to include the location of your facility, nearby buildings or facilities, roads, culverts, drainage patterns, and any nearby bodies of water.
- 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 by contacting Robert Eno at (867)975-7748 or reno@gov.nu.ca. This procedure should be discussed in the spill plan.
- The NWT-Nunavut spill report form has been updated, and can be obtained from DOE website (<http://www.gov.nu.ca/env/>). This form should be included in the spill plan. 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.

B. AIR QUALITY

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

For camps 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 Canada-wide Standards. 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.

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. Finally, incineration of hazardous wastes is strongly discouraged.

DOE thanks NWB for giving us the opportunity to review and provide comments on the Hope Lake camp project. 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