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via e-mail

RE: Robert Zubrin - 3BC-MAR – Mars Project – Water License Renewal

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*.

Mr. Robert Zubrin has submitted a renewal application for water use and waste disposal associated with camp operations for the Mars Project on Devon Island, Nunavut.

Environment Canada recommends that the following conditions be applied throughout all stages of the project:

- All sumps used for the disposal of camp sewage and grey water shall be located above the high water mark of any water body and in such a manner as to prevent the contents from entering any water body frequented by fish. Further, all sumps shall be backfilled upon completion of the field season.
- All fuel caches shall be located above the high water mark of any water body and in such a manner as to prevent the contents from entering any water body frequented by fish. Environment Canada recommends the use of secondary containment, such as self-supporting insta-berms, when storing barreled fuel on location.
- EC recommends the use of an approved incinerator for the disposal of combustible camp wastes. The proponent shall ensure that hazardous wastes, including waste oil, receive proper treatment and disposal at an approved facility.
- Spills shall be documented and reported to the 24 hour Spill Line at (867) 920-8130.
- All releases of harmful substances, regardless of quantity, are immediately reportable where the release:
 - is near or into a water body;
 - is near or into a designated sensitive environment or sensitive wildlife habitat;
 - poses an imminent threat to human health or safety; or
 - Poses an imminent threat to a listed species at risk or its critical habitat.
- Environment Canada has reviewed the Spill Contingency Plan (SCP) and feels that it is insufficiently developed and strongly recommends that the Plan be revised and submitted to the Nunavut water board. EC recognizes that the Mars Project has not had a spill to date however; it

is human nature to make mistakes and for accidents to occur. The Mars Project Spill Plan should include a clear chain of command and list of personnel that should be contacted in the event of a spill. The chain of command should identify specific individuals and provide their contact information and role in the event of a spill. The Plan should provide direction regarding how to respond to spills on various environments, such as snow, ice, muskeg, etc...The Plan should also include a list of equipment that will be available on-site.

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) 975-4631 or by email at cindy.parker@ec.gc.ca.

Yours truly,

Original signed by

Cindy Parker
Environmental Assessment Technician

cc: (Colette Spagnuolo, Environmental Assessment & Contaminated Sites Specialist, Environment Canada, Iqaluit)