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Department of Environment

Ministère de l'Environnement

November 5<sup>th</sup>, 2009

Richard Dwyer  
Licensing Administrator  
Nunavut Water Board

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

**RE: NWB FILE # 3BC-MAR0709 --- MARS PROJECT ---WATER LICENSE RENEWAL**

Dear Mr. Dwyer:

The Government of Nunavut, Department of Environment (DOE) has reviewed the water license renewal application from The Mars Society. The DOE has the following comments and recommendations based on the *Environmental Protection Act*.

**GENERAL**

All sumps used for the disposal of sewage and greywater should be located at least 30 m from the high water mark of any water body, and should be covered at the end of the field season.

**FUEL CACHE**

To prevent spreading in the event of a spill, fuel stored in drums should be located, whenever practical, in a natural depression a minimum distance of 90 feet (30 m) from all streams, preferably in an area of low permeability.

DOE recommends the use of secondary containment when storing fuel on site. The secondary containment should be of adequate size and volume to contain and hold fluids for the purpose of preventing spills.

Drip pans, or other similar preventative measures, should be used when refueling equipment on site.

**SEWAGE DISPOSAL**

DOE recommends, for a camp of this size, that sewage be deposited into a sump located at least 30 m from the ordinary high water mark of any waterbody.

## **SPILL CONTINGENCY PLANNING**

DOE recommends that a formal spill contingency plan be prepared. The proponent is referred to the GN-DOE's *Contingency Planning and Spill Reporting in Nunavut: A Guide to the New Regulations*.

## **INCINERATION**

For small camps (less than 10 people or less than 900 person days/yr):

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
- 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 DOE thanks the NWB for giving us the opportunity to review and provide comments on The Mars Society's water license renewal application. Please contact us if you have any questions or comments.

Yours sincerely,

### ***Original signed by***

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