

$\trianglelefteq \cap C_{\alpha}^{\beta}$

Avatiligiyiit

Department of Environment

Ministère de l'Environnement

December 29, 2008

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board

via Email to: licensing@nunavutwaterboard.org

RE: NWB FILE # 3BM-CLY0308 – Hamlet of Clyde River Water Licence Renewal Application

Dear Ms. Beaulieu:

The Government of Nunavut, Department of Environment (DOE) has reviewed the municipal water license renewal application from the Hamlet of Clyde River, and has the following comments and recommendations to make based on the *Environmental Protection Act* regarding spill contingency planning and solid waste management.

1. Spill Response Plan

The Spill Response Plan (SRP) provided by the Proponent was designed for the Hamlet of Clyde River's aggregate deposits and does not seem to include other facilities such as the Water Treatment Plant, Wastewater Treatment Facility and Solid Waste Disposal Facility. If the SRP is intended to include the water and waste management facilities it should be updated to reflect this. This update should also include details on how to deal with a potential raw wastewater spill and subsequent clean up. Moreover, no treatment or disposal methods of contaminated material (e.g. contaminated soil) are outlined in the SRP. This could be accomplished in the SRP by including location of disposal sites approved to accept wastes, means of storage prior to disposal and other approvals required or by outlining in situ treatment methods.

2. Solid Waste Management

According to the *Supplementary Questionnaire for Municipalities*, the Solid Waste Disposal Facility is unfenced with no signage and open burning constitutes part of solid waste management in Clyde River.

DOE therefore would like to recommend the Solid Waste Disposal Facility be properly fenced with proper signage.

Additionally, DOE would like to state that open burning remains a last option for the management of solid waste (i.e., untreated wood) unless the proponent fails to identify a feasible and practical alternative. In general, proponents are required to comply with the *Canada-Wide Standards for Dioxins and Furans*, and the *Canada-Wide Standards for Mercury Emissions*, for management and incineration of municipal or camp wastes. If open burning is to be carried out due to lack of other options, the proponent is required to follow the procedures below consistent with the DOE policy titled: *Municipal Solid Wastes Suitable for Open Burning*.

- The principle of source reduction should be utilized to reduce, reuse and recycle materials otherwise bound for landfill.

