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Your file - Votre référence
2BE-EDE

Our file - Notre référence
9545-2 / #92761

July 21, 2006

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Via Email

Re: 3BC-EDE - Henik Lake Adventures Ltd. - Edehon Lake Project - licence application

On behalf of Indian and Northern Affairs Canada (INAC) I have reviewed the above-mentioned application. The following specialist advice has been provided pursuant to INAC's mandated responsibilities for the enforcement of the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* (NW&NSRT), *Arctic Waters Pollution Prevention Act* (AWPPA), and the *Department of Indian Affairs and Northern Development Act* (DIAND Act).

Project Information

Henik Lake Adventures Ltd. is applying for a licence to permit the use of water and disposal of wastes associated with the operation of a seasonal camp. It intends to construct a 12-person camp on the south side of Edehon Lake, general coordinate of 60°20'N, 97°07'W, once the requested licence is issued. As a result, it has named this undertaking as the Edehon Lake Project. The proposed campsite is approximately 120 km southwest of the Hamlet of Arviat. The proponent has requested permission to consume 1,140 liters of freshwater per day for domestic uses.

Graywater and sewage will be directed to natural depressions positioned 700 feet (approximately 21 metres) away from the camp site. Combustible wastes will be incinerated on-site. Non-combustible and hazardous wastes will be delivered to approved disposal facilities.

The camp's fuel cache will contain liquid fuels stored in 205 L steel drums and 100 lb propane tanks. This cache will contain a maximum of 4,100 - 5,125 L of JET-B fuel (20-25 drums), 1,025 L of gasoline (5 drums), 2,050 L of P-50 heating fuel (10 drums), and 500 lbs (5 tanks) of propane at any given time.

INAC Comments

INAC recommends that the Nunavut Water Board take into consideration the following comments when reviewing this licence application.

GENERAL

- INAC recommends the use of an approved incinerator for the disposal of combustible wastes.
- INAC recommends that the ashes of burned combustible wastes be raked to remove non-combustible items (e.g., iron nails and tinfoil). Raked ashes should either be buried on-site or delivered to an approved waste disposal facility.
- All sumps or natural depressions used for the disposal of graywater and sewage shall be positioned at least 30 metres from the high water mark of nearby water bodies. Furthermore, all sumps shall be backfilled and contoured to match the surrounding landscape prior to the end of the project's field program.

SPILL CONTINGENCY PLAN

- INAC recommends that the proponent submit a revised Spill Contingency Plan for the Edehon Lake Project which includes the following details:
 - ▶ A contact number for the person who is responsible for coordinating spill response efforts on-site.
 - ▶ Initial actions to be undertaken by company personnel when responding to a hazardous material spill (e.g., be alert and check for hazards, determine whether the spill can be stopped and brought under control).
 - ▶ Include a copy of the Nunavut Spill Report Form (accessible on the <http://ftp.nunavut.ca/nwb> website) and ensure that all hazardous material spills are reported to the 24-hour Spill Report Line at (867) 920-8130.
 - ▶ Provide a list of contacts for reporting hazardous material spills. In addition to the 24-hour Spill Report Line, INAC's Water Resources Inspector should be notified by calling (867) 975-4298.
 - ▶ Summarize response procedures for spills in applicable environmental conditions/terrain, i.e., land, water, snow, and ice.
 - ▶ Provide a list of the project's spill response equipment and indicate where it will be mobilized.
 - ▶ Provide a detailed map of the project area which identifies the fuel cache and spill response equipment storage locations in relation to the camp facilities and surrounding environment.
 - ▶ Have the Material Safety Data Sheets for hazardous materials used in project activities appended to the Plan.
- INAC recommends that the proponent review the Guidelines for Contingency Planning document written by the Northwest Territories Water Board in January, 1987 prior to revising its Spill Contingency Plan. These Guidelines can be accessed on the <http://ftp.nunavut.ca/nwb> website
- All fuel caches shall be located above the high water mark of any water body. Further, it is recommended that some form of secondary containment, such as self-supporting insta-berms, be used when storing barrelled fuel on-site.

ABANDONMENT AND RESTORATION

- INAC recommends that the Nunavut Water Board require the proponent to submit an Abandonment and Restoration Plan for its Edehon Lake Project. This Plan should summarize those procedures that will be followed for seasonal shutdowns and its final abandonment.

Indian and Northern Affairs Canada requests notification of any changes in the proposed project, as further review may be necessary. Please do not hesitate to contact me if you have any questions or comments with regards to the foregoing.

Sincerely,

Original signed

David W. Abernethy
Water Resources Coordinator

cc. Jim Rogers - Manager of Water Resources, Indian and Northern Affairs Canada, Iqaluit