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Department of Environment

Ministère de l'Environnement

February 26, 2009

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board

via Email to: licensing@nunavutwaterboard.org

RE: NWB FILE # 3BC-SHE – Nasittuq Corporation – Shepherd Bay CAM-3 Long Range Radar Site Water License Application

Dear Ms. Beaulieu:

The Government of Nunavut, Department of Environment (DOE) has reviewed the water license application from Nasittuq Corporation for the Shepherd Bay CAM-3 LRR site, and has the following comments and recommendations to make based on the *Environmental Protection Act* regarding spill contingency and incineration.

1. Spill Contingency Plan

The NWT-Nunavut spill report form can be obtained from the DOE website (<http://www.gov.nu.ca/env/applications.shtml>). This form should be included in the spill plan, and the proponent is required to use this form for reporting to the Spill Line. Additionally, the proponent is advised to enter spill information electronically in the form to ensure the information is legible to regulators inspecting the spill.

2. Incineration

In the Water License Application it is stated that between 10 - 24 people may be on site. For medium camps (10-50 people or greater than 900 but less than 4410 person days/yr) DOE has the following to recommend.

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 for Dioxins and Furans* and the *Canada-Wide Standard for Mercury Emissions*¹. 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 (i.e. the separation of non-food waste items suitable for storage and subsequent transport and disposal or recycling).
- 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.

¹ The CCME-CWS for *Dioxins and Furans* is available at: http://www.ccme.ca/assets/pdf/d_and_f_standard_e.pdf
For Waste Incineration, see page 6-9.

The CCME-CWS for Mercury Emissions is available at: http://www.ccme.ca/assets/pdf/mercury_emis_std_e1.pdf

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Under no circumstance should hazardous wastes be managed through burning or incineration. The efforts made to achieve compliance shall be reported annually.

We thank the NWB for the opportunity to provide comments on Nasittuq Corporation's water license application. Please contact us if you have further questions.

Yours sincerely,

Original signed by

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