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Department of Environment

Ministère de l'Environnement

February 15, 2010

Tannis Bolt
Environmental Administrator
Nunavut Impact Review Board

via Email to: info@nirb.ca

RE: NIRB File # 10EN006: Notice of Part 4 Screening and Comment Request for Comaplex Minerals Corp.'s "Meliadine River - Mining Exploration" project proposal

Dear Ms. Bolt:

The Department of Environment (DOE) has reviewed the project proposal from Comaplex Minerals Corp. for the Meliadine River Mining Exploration. Based on DOE's mandate under the *Environmental Protection Act* & the *Territorial Parks Act*, we have the following comments and recommendations to make.

1. Spill Contingency Planning

Although the Spill Contingency Plan provided for this application is very detailed, it addresses the Meliadine West Gold Project and does not account for the Meliadine River Exploration. The DOE recommends that a spill contingency plan be created for this exploration project. It should include, but is not limited to, the following:

- The date the contingency plan was prepared.
- The name and address of the person in charge, management or control. This is an on-site person responsible for managing the facility. This person would be initially responsible for clean up activities.
- The name and address of the owner if different from the person in charge. This is the person ultimately responsible for the facility, usually the owner.
- The name, job title and 24 hour telephone number for the persons responsible for activating the contingency plan. This ensures the

employee discovering the spill can activate a response and provides a 24 hour point of contact for the authority investigating the spill.

- A description of the facility including the location, size and storage capacity. This is important if persons are unfamiliar with the facility or area. The description could include a map and/or diagrams.
- A site map that is intended to illustrate the facilities relationship to other areas that may be affected by the spill. The map should be to scale and be large enough to include the location of your facility, nearby buildings or facilities, roads, culverts, drainage patterns, and any nearby bodies of water.
- A description of the type and amount of fuels and chemicals normally stored on site.
- The steps to be taken to report, contain, and clean up and dispose of a contaminant in the case of a spill.
 - a) Reporting: Notification of all parties involved. This can include internal and external reporting procedures as well as a copy of the spill report.
 - b) Clean up: Removal of the contaminant from the environment, a detailed of actual containment and clean up techniques. (2 steps: contain and remediate; be aware of fire)
 - c) Disposal: Is the treatment of the contaminant such that it is no longer a threat to the environment. Plans may include location of disposal sites approved to accept wastes, means of storage prior to disposal and other approvals required. (Waste Manifest doc)
- The means by which the contingency plan is activated. This should outline internal company procedures to activate appropriate response equipment and personnel.
- A description of the training provided to employees to respond to a spill. A sound training program is necessary when dealing with an emergency situation
- An inventory and the location of response and clean up equipment available to implement the plan. This includes your equipment as well as any to be used by another person responding to the spill on your behalf.

2. Fuel/Chemical Storage

- 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 (31 m) from all streams, preferably in an area of low permeability.

- All fuel storage containers should be situated in a manner that allows easy access and removal of containers in the event of leaks or spills. Large fuel caches in excess of 20 drums should be inspected daily.
- Drip pans, or other similar preventative measures, should be used when refueling equipment on site.
- 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.
- The applicant should be required to remove unused chemicals for reuse or disposal to an approved site using methods approved by the Land Use Inspector.
- Chemicals containing salts, which may attract wildlife to the site, should be stored so that they are inaccessible to wildlife.
- All chemicals should be stored in a safe and chemically-compatible manner a minimum of 90 feet (31 m) from all bodies of water.

3. Iqalugarjuup Nunanga Territorial Park

The Department of Environment – Division of Parks and Special Places has noted that the Proponent has been conducting commercial activities within the boundaries of the Iqalugarjuup Nunanga Territorial Park without a permit. DOE conservation officers have, on 2 occasions, had to intervene, which resulted in the Proponent's removal from the Park. The Iqalugarjuup Nunanga Territorial Park has been established for recreational use and enjoyment. Commercial activities are contrary to the goals of its establishment. Attached are two pieces of DOE correspondence for the Board's information. It may be worthwhile for NIRB to remind the proponent to refrain from conducting activities within park boundaries.

The DOE thanks the NIRB for the opportunity to review and provide comments on this submission. Please contact us if you have further questions or comments.

Sincerely,

Original signed by

Allison Loder
Environmental Analyst
Department of Environment



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Attachments: DOE letter to Comaplex Minerals Corp (February 2010)
DOE letter to GeoVector Management Inc. (August 2003)

