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Building *Nunavut* Together  
*Nunavut* liuqatigiingniq  
Bâtir le *Nunavut* ensemble

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Government of Nunavut  
Nunavut Kavamat  
Gouvernement du Nunavut

August 6, 2021

Francis Emingak  
Junior Technical Advisor  
Nunavut Impact Review Board  
P.O. Box 1360  
Cambridge Bay, NU, X0B 0C0

Sent VIA Email: [info@nirb.ca](mailto:info@nirb.ca)

**RE: Notice of Screening and Comment request for Government of Nunavut's Kugluktuk Angoniatit Associations "Char Habitat Restoration" Project Proposal**

Dear Francis Emingak,

The Government of Nunavut (GN) would like to thank the Nunavut Impact Review Board (NIRB) for the opportunity to provide comments regarding the Government of Nunavut's Kugluktuk Angoniatit Association's "Char Habitat Restoration" Project Proposal.

The GN has reviewed the proposed project and the Department of Environment offers comments as it pertains to, Safety and Safe Handling and Fuel Storage and Waste Disposal as further described in the attached Appendix.

The GN looks forward to any further information on this project from NIRB. Should there be any concerns or need for follow-up, please do not hesitate to contact me by phone at 867-975-7828 or by email at [asimonfalvy@gov.nu.ca](mailto:asimonfalvy@gov.nu.ca).

Qujannamiik,

*[Original Signed By]*

Agnes Simonfalvy  
Avatiliriniq Coordinator  
Government of Nunavut

<b>GN-01: Safety and Safe Handling of Dexpan (Calcium dihydroxide)</b>	
<b>Department</b>	Department of Health
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Health and Safety
<b>References</b>	NIRB Application of Screening, #125626, July 2021 Dexpan Safety Data. Retrieved August 3, 2021, from <a href="https://www.dexpan.com/pages/dexpan-safety-data">https://www.dexpan.com/pages/dexpan-safety-data</a>
<b>CONCERNS</b>	
<p>The Proponent has not included a plan for safe handling of Dexpan in the proposal. Dexpan Safety Data Sheet identifies main ingredient as Calcium dihydroxide which is a known corrosive agent, therefore a plan for safe handling and exposure response should be developed to ensure workers have the knowledge to protect themselves and others.</p>	
<b>RECOMMENDATIONS</b>	
<p>The GN recommends that the Proponent provide the following to the Board:</p> <p>Dexpan safety and safe handling Plan that includes;</p> <ol style="list-style-type: none"> <li>1. Prevention of unsafe exposure and personal protective equipment that will be used when handling Dexpan.</li> <li>2. The appropriate response to treat Dexpan exposure.</li> </ol>	
<b>ADDITIONAL COMMENTS</b>	

<b>GN-02: Fuel Storage and Waste Disposal</b>	
<b>Department</b>	Department of Environment
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Lack of information about fuel and Dexpan storage
<b>References</b>	NIRB Application of Screening, #125626, July 2021 Char Habitat Restoration near Kugluktuk, Nunavut, July 2021
<b>CONCERNS</b>	
<p>Currently, it is not clear that the Proponent has sufficiently planned to address possible leaks or spills. Clarification on how fuel and Dexpan will be stored at the project location is needed to assess potential risks.</p>	
<b>RECOMMENDATIONS</b>	
<p>The GN recommends that the Proponent provide the following clarification to the Board on:</p> <ol style="list-style-type: none"> <li>1. How will 150gal of fuel, white gas and 55lbs of Dexpan be stored?</li> <li>2. What precautions are taken to prevent fuel and Dexpan spills and leaks?</li> <li>3. What precautions are taken to prevent wildlife from coming in contact with fuel and Dexpan?</li> </ol>	
<b>ADDITIONAL COMMENTS</b>	