Water Resources Division Nunavut Regional Office Iqaluit, NU X0A 0H0

Mar 19, 2012

NWB FILE: 1BH-CHE----CIDMS #: 514381

Re: Mosher Engineering Limited – Upgrade & Expansion of Chesterfield Inlet Fuel Storage Facility – New Type 'B' Water Licence Application

Please be advised that Aboriginal Affairs and Northern Development Canada (AANDC) has completed a review of the new water license application 1BH-CHE---- submitted by Mosher Engineering Limited. The NWB circulated the new water license application for comments on February 18, 2010. All associated documents related to this new water license application posted on the NWB ftp site under 1BH-CHE---- were included in my review (See attached Technical Review Memo).

Should you have any questions or comments, please do not hesitate to contact me at (867) 979-4282 or by email at lan.Parsons@aandc.gc.ca.

Sincerely,

Original signed by

lan Parsons Regional Coordinator

Cc. Murray Ball, Manager of Water Resources – AANDC, Nunavut Regional Office



Technical Review Memo

To: Phyllis Beaulieu - Manager of Licensing, Nunavut Water Board

From: Ian Parsons – Regional Coordinator, AANDC.

Re: Mosher Engineering Limited – Upgrade & Expansion of Chesterfield Inlet Fuel Storage Facility – New Type 'B' Water Licence Application

The Chesterfield Inlet Fuel Storage Upgrade and Expansion Project will be completed in September 2012 and will consist of the construction of two new vertical tanks (1933 m³ and 582 m³ respectively), relocation of one 1379 m³ vertical tank and the relocation of two horizontal tanks that will be converted to slop tanks.

As well there will also be some small upgrades to the tank farm facility including new pipelines, new sumps and new secondary containment areas, new fencing and lighting, a new operator's shelter facility and a new fuel dispenser building.

Mosher Engineering Limited (Proponent) will be using sea water from the nearby beach to conduct hydrostatic testing of these tanks. After completing the hydrostatic testing; the tanks will be cleaned and all hazardous/waste materials will be placed in drums and shipped via sealift to Montreal for proper disposal.

AANDC's mandate with respect to water resources is with the protection and conservation of fresh water resources in Nunavut. The water that is being used for the project will be sea water and therefore is outside of AANDC's mandate/jurisdiction. However, there are some concerns regarding the waste disposal associated with this project.

Comments/Recommendations

- Water used during the hydrostatic testing and cleaning of the tanks must be analyzed for total petroleum hydrocarbons and must meet applicable standards (CCME) before it can be discharged back into the environment.
- 2) AANDC recommends all contaminated wastes/sludge that are collected in drums should be removed from the site in a timely manner and



disposed of at an approved waste disposal site. The proponent should be advised that in order to transport hazardous wastes in Nunavut the waste generator is required to be registered with the Government of Nunavut, Environmental Protection Division as well as providing the final destination for the hazardous wastes (approved registered facility).

- 3) The spill plan indicates the development of a new landfarm to treat the contaminated soil from the tank farm. In talks with the NWB, the NWB clarified and confirmed that the proponent meant to reference the hamlet's landfarm as the landfarm to contain the contaminated soil and not the development of a new landfarm facility under this water license. In this regard, the hamlet's landfarm is captured under water license 3BM-CHE1013. Therefore AANDC recommends that the proponent clarify this section of the spill plan.
- 4) AANDC recommends that the proponent have the proper authorizations from the hamlet of Chesterfield Inlet to deposit the contaminated soil into the hamlet's approved landfarm facility.
- 5) AANDC recommends the use of drip pans and/or other secondary containment when refueling operations are taking place.

Cc. Murray Ball, Manager of Water Resources – AANDC, Nunavut Regional Office Andrew Keim, A/Manager Field Operations— AANDC, Nunavut Regional Office

