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NWB File: 1BH-RFS  
Our file: 4340 027

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Via Email: [licensingadmin@nunavutwaterboard.org](mailto:licensingadmin@nunavutwaterboard.org)

**Re: 1BH-RFS - Mosher Engineering Limited – Rankin Inlet Fuel Storage Facility  
Project – New Type B**

On behalf of Environment Canada (EC), I have reviewed the information submitted with the above-mentioned application. The following specialist advice has been provided pursuant to the *Canadian Environmental Protection Act*, and Section 36(3) of the *Fisheries Act*.

**Background**

Mosher Engineering Limited has applied to upgrade and expand the existing Rankin Inlet Fuel Storage Facility. Upgrades will include two new 3064 cubic meter (cu.m) Jet A-1 vertical tanks, two new 2565cu.m LSDL vertical tanks, one new 1956 cu.m LSDL vertical tank; the relocation of three 1351 cu.m LSDL vertical tanks including appurtenances; resupply pipeline; connection and spill basin; operator's shelter; LSDL/ Gasoline Dispenser Building; fencing and granular base and berms. All tanks will be cleaned prior to filling, and sludges will be stored in drums and shipped south for proper disposal. Water will be tested prior to discharge into Repulse Bay.

Environment Canada provides the following comments and recommendations for the Board's consideration with respect to the above mentioned application:

**General:**

- The proponent shall not deposit, nor permit the deposit of chemicals, sediment, wastes, or fuels associated with the project into any water body. According to the *Fisheries Act*, Section 36 (3), the deposition of deleterious substances of any type in water frequented by fish, or in any place under any conditions where the deleterious substance, or any deleterious substance that results from the deposit of the deleterious substance, may enter any such water, is prohibited.
- The proponent states that they will be sending water samples to a laboratory for testing prior to discharge; however, it is not mentioned which parameters will be sampled. EC requests that the proponent provide a list of the parameters that will be sampled and the laboratory which will be used for the analysis.
- The proponent shall ensure that all soils and materials impacted with hydrocarbon contamination receive proper treatment and disposal. The proponent shall not dispose of these materials with the general garbage at the local landfill.
- Environment Canada recommends that if it is necessary to excavate contaminated soils in close proximity to a waterbody, measures be taken to ensure that sedimentation of the

waterway does not occur. This could include the use of silt curtains, silt fences, or other such preventative measures.

- An Abandonment and Reclamation plan should be submitted to the Nunavut Water Board for review, and should include upgrades and expansion to the Fuel Storage Facility.
- A Spill Contingency Plan must be developed which includes prevention, preparedness and response. Copies of the spill plan must be made readily available on site, and all staff should be familiar with operational procedures in the event of a spill. The Spill Contingency Plan should:
  - Assign responsibilities to company staff and/or contractors and outline a clear path of response;
  - Provide a list of agencies/ persons to be contacted in the event of a spill including their phone numbers, etc.;
  - Provide direction regarding response actions for spills on various types of terrain (eg. spills on land, water, ice etc.);
  - Create and maintain a list and indicate location(s), both on and off site, of equipment available to be used in the event of a spill;
  - Ensure drip pans are utilized when refueling equipment;
  - Ensure proper drip pans are utilized when refueling equipment;
  - Ensure proper handling and disposal of contaminated materials resulting from the containment, clean-up, etc. of any spills; and,
  - State that all spills of oil, fuel or other deleterious material, regardless of size are to be reported to the 24-hour Spill Line (867) 920-8130.

If there are any changes in the proposed activities, EC should be notified, as further review may be necessary. If you have any questions regarding the foregoing please contact Carrie Spavor at (867) 975-4631 or via email at [carrie.spavor@ec.gc.ca](mailto:carrie.spavor@ec.gc.ca).

Yours truly,

*Original signed by*

Carrie Spavor  
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cc: Carey Ogilvie (Head, EA-North, Environment Canada, Yellowknife, NT)  
Ron Bujold (EA Technician, Environment Canada, Yellowknife, NT)