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Department of Environment

Ministère de l'Environnement

**August 10, 2009**

**Phyllis Beaulieu**
**Manager of Licensing**
**Nunavut Water Board**

***via Email to:*** licensing@nunavutwaterboard.org

**RE: File No. 1BH-RFS ---- Rankin Inlet Fuel Storage Facility Project -- Mosher Engineering Limited New Water License Application**

Dear Ms. Beaulieu:

The Government of Nunavut, Department of Environment (DOE) has reviewed the water license application from Mosher Engineering Limited for the Rankin Inlet Fuel Storage Facility Project, and has the following comments and recommendations to make based on the *Environmental Protection Act.*

**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.

In addition, the following information is required:

- 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 type and amount of fuels and chemicals normally stored on site.

- 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 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.

- 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, 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. Abandonment & Restoration

It is recommended that the proponent prepare and submit a preliminary abandonment and restoration plan for review, or update and submit any existing plans.

**3. Waste Oil/Waste Fuel Disposal**

- Waste oil and waste fuel should be removed and returned for recycling when the land use activity is completed. Alternative methods of disposal that provide and equivalent level of environmental protection will be considered on a case by case basis.

- Used fuel and oil drums should be removed from the site, returned for deposit, or reused

**4. Effluent Discharge Criteria**

- The proponent has stated that any effluent will be tested before discharge, however, they have not stated what they will be testing for, and what standards they wish to achieve prior to discharge. DOE would like the proponent to clarify what they intend to achieve.
- The proponent is referred to DOE's *Environmental Guideline for Industrial Waste Discharges*.

DOE thanks the NWB for the opportunity to provide comments on Mosher Engineering Limited's water license application. Please contact us if you have further questions.

Yours sincerely,

***Original signed by***

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