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Our file: 4782 026 NWB file: 1BH-RFS0910

Richard Dwyer Licensing Administrator Nunavut Water Board P.O. Box 119 Gjoa Haven, NU X0A 1J0

Via email at: licensingadmin@nunavutwaterboard.org

RE: Mosher Engineering Ltd. - 1BH-RFS0910 - Rankin Inlet Fuel Facility Upgrade Project Spill Contingency Plan

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 Environment Canada's mandated responsibilities for the enforcement of the Canadian Environmental Protection Act, Section 36(3) of the Fisheries Act, the Migratory Birds Convention Act, and the Species at Risk Act.

Mosher Engineering Ltd. has submitted a Spill Contingency Plan in fulfillment of Part H, Item 1 of Water Licence 1BH-RFS0910. Environment Canada provides the following comments and recommendations with respect to the Spill Contingency Plan (Plan) for the Nunavut Water Board's consideration:

General

- The date this plan was prepared should be presented somewhere in the document for document tracking purposes.
- A copy of the Plan should be posted where crew members have access to it, and at each fuel cache and refuel station.
- Large fuel storage facilities should be inspected daily. EC recommends that an inspection schedule be developed for large fuel storage facilities.
- A list of spill response procedures outlining a clear path of response for company staff or contractors should be included in the Plan.
- The Plan should include the following statement, "<u>all spills</u> of oil, fuel, or other deleterious materials, <u>regardless of size</u>, are to be reported to the NWT-NU 24hr Spill Line (867) 920-8130.
- The Plan should also provide a list of agencies/ persons to be contacted in the event of a spill including their phone numbers.
- A section should be included in the Plan that provides direction regarding response action for spills on various types of terrain (e.g. spills on land, water, snow/ice, muskeg, etc.)
- Personnel should be made aware of the properties of the products that they handle and have access to material safety data sheets (MSDS) and other sources of information. This information should be included in the Plan and at any location where these products are stored.
- Environment Canada recommends that the proponent include a provision that drip



pans be used when refueling equipment on site in order to help prevent spills from occurring.

Section 1.8

- The location of the new contaminated soil storage area should be provided in the Disposal section or on the map provided
- The Reporting subsection should include reportable spill quantities (see table below)

Schedule 1 – Reportable Quantities

TDG Class	Substance	Reportable Quantities for NWT/NU 24- Hour Spill Reports
1.0	Explosives	Any amount
2.3	Compressed gas (toxic/corrosive)	
6.2	Infectious substances	
6.2	Sewage and wastewater (unless otherwise	
	authorization)	
7.0	Radioactive materials	
None	Unknown substance	
2.1	Compressed gas (flammable)	Any amount of gas from containers with a
2.2	Compressed gas (non-corrosive, non-flammable)	capacity greater than 100 L
3.0	Flammable liquid	≥ 100 L
4.1	Flammable solid	≥ 25 kg
4.2	Substances liable to spontaneously combustible	3
	Water reactant substances	
4.3		
5.1	Oxidizing substances	≥ 50 L or 50 kg
5.2	Organic peroxides	≥ 1 L or 1 kg
9.0	Environmentally hazardous substances intended for disposal	
6.1	Toxic substances	≥ 5 L or 5 kg
8.0	Corrosive substances	0 _ 0 1 0 Ng
9.0	Miscellaneous Products, Substances or	
	Organisms	
9.0	PCB mixtures of 5 or more parts per million	≥ 0.5 L or 0.5 kg
None	Other contaminants, e.g., crude oil, drilling fluid,	≥ 100 L or 100 kg
	produced water, waste or spent chemicals, used	
	or waste oil, vehicle fluids, wastewater, etc.	
None	Sour natural gas (i.e., contains H ₂ S)	Uncontrolled release or sustained flow of
	Sweet natural gas	10 minutes or more
3.0	Flammable liquid	≥ 20 L
None	Vehicular fluid	When released on a frozen water body
		used as a working surface

Report releases/potential releases of any size that:

are near or into an open water body;

are near or into a designated sensitive environment or sensitive habitat; pose an imminent threat to human health or safety; or

pose an imminent threat to a listed species at risk or its critical habitat.

Note: L = litre; kg = kilogram; PCB = polychlorinated biphenyls; ppm = parts per million.

 Mosher Engineering Ltd. may wish to consult the EPPER <u>Field Guide for Oil Spill</u> <u>Response</u> in Arctic Waters, or they can contact Dave Tilden at (867)669-4728 for further information.

If there are any changes in the proposed project, EC should be notified, as further review may be necessary. Please do not hesitate to contact me with any questions or comments with regards to the foregoing at (867) 975-4631 or by email at paula.c.smith@ec.gc.ca

Yours truly,

Original signed by

Paula Smith
Environmental Assessment Coordinator
Environmental Assessment – North
Environmental Protection Operations

cc: Carrie Spavor, (Environmental Assessment Coordinator, Iqaluit, NU)
Carey Ogilvie (Head, EA-North, EPO, Yellowknife, NT)