



NIRB File No.: 15UN042

NWB File No.: 1BH-SAN----

AANDC File No.: CIDMS # 930876

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August 13, 2015

Nunavut Construction Limited
c/o Guy Chicoyne
305 C, Montée Caliza-Lavallée
Verchères, Quebec, J0L 2R0

Sent via email: g.chicoyne@construction-nq.com

Re: Opportunity to address comments received regarding Nunavut Construction Limited's "Sanikiluaq Bulk Fuel Facility Upgrade" project proposal

Dear Guy Chicoyne:

On May 28, 2015 the Nunavut Impact Review Board (NIRB or Board) received Nunavut Construction Limited's (the Proponent) "Sanikiluaq Bulk Fuel Facility Upgrade" project proposal from the Nunavut Water Board for a Type B water licence application. On July 8, 2015 the NIRB received a referral from the Government of Nunavut, the Department of Community and Government Services.

On July 20, 2015 the NIRB invited interested parties and municipalities most affected by the "Sanikiluaq Bulk Fuel Facility Upgrade" project to provide comments directly to the NIRB by August 10, 2015.

On or before August 10, 2015 the NIRB received comments from the following interested parties:

- **Government of Nunavut**
- **Aboriginal Affairs and Northern Development Canada**
- **Environment Canada**

All comments and documents received pertaining to this project proposal can be obtained from NIRB's ftp site at <http://ftp.nirb.ca/01-SCREENINGS/ACTIVE%20SCREENINGS/15UN042-GN-Sanikiluaq%20Tank%20Farm/02-DISTRIBUTION/COMMENTS/>.

A summary of the main concerns raised relate to the following:

- Water sources to be used for hydrostatic testing of tanks appear to be located near industrial areas and may contain contaminants. Testing of the water is recommended prior to discharge including testing for hydrocarbons with values not to exceed 15 parts per million (ppm) for concentrations of total petroleum hydrocarbons.
- Further clarification required on the assessment approach for determining oil separator implementation prior to discharge of water used for hydrostatic testing. Would this be based on the visual presence of oil, or based on water quality sampling?
- Further clarification required on whether there will be standardized criteria for determining acceptable and unacceptable levels of oil in the discharge water.
- Monitoring of rate of discharge water is recommended to minimize sediment erosion, disturbance and discharge into Hudson Bay.
- Soil contained within the tank farm berm should be treated as hazardous waste due to known hydrocarbon spills from previous years. Proper transportation and disposal arrangements must be made.
- Access of food, domestic wastes and petroleum-based chemicals including used absorbent materials to wildlife. It is recommended these items be made inaccessible to wildlife at all times.
- Implementation of mitigation measures to help reduce or eliminate some effects of the project on migratory birds and Species at Risk.
- Spill contingency plan does not provide project specifics including the resupply pipeline that was installed in 2014. It is recommended to include this information within the spill contingency plan prior to commencing the upgrades.
- Documentations related to community consultation conducted by Proponent not provided for review and comments could not be provided.

As a result of the concerns raised during the public consultation period for this proposal, and the potential that previously upgrades may not have been completed to the associated facility without being screened by the NIRB prior to the development occurring, the NIRB requests the following clarification:

- A summary of the re-supply pipeline project undertaken in 2014, and
- An indication of any considerations made in the current project proposal as a result of the re-supply pipeline upgrade.

Due to these concerns, the NIRB would like to provide Nunavut Construction Limited with an opportunity to address all the comments prior to the Board making its decision to the Minister. The NIRB requests that a response be provided directly to the NIRB by **August 27, 2015**.

Please send your comments to the NIRB at info@nirb.ca or via fax at **(867) 983-2594**.

If you have any questions or require clarification, feel free to contact the undersigned at (867) 857-2052 or sgranchinho@nirb.ca.

Sincerely,



Sophia Granchinho, M.Sc., EP
Senior Technical Advisor
Nunavut Impact Review Board

cc: Phyllis Beaulieu, Nunavut Water Board
 Ken Wasylyshen, Government of Nunavut
 Agnes Simonfalvy, Government of Nunavut
 Andrea Markey, Aboriginal Affairs and Northern Development Canada
 Erika Marteleira, Aboriginal Affairs and Northern Development Canada
 John Price, Environment Canada
 Loretta Ransom, Environment Canada
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