



Environment
Canada

Environnement
Canada

Environmental Protection Operations (EPO) Directorate
Prairie and Northern Region (PNR)
5019 52nd Street, 4th Floor
P.O. Box 2310
Yellowknife NT X1A 2P7

August 9, 2013

EC file: 6600 000 049 002
NWB file: 130710 1BR-BIR

Megan Porter, Licence Administrator Assistant
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0

Via e-mail: megan.porter@nunavutwaterboard.org

Attention: Ms. Porter

RE: 130710 1BR-BIR - Stantec Consulting Ltd New Application - Type B-Qikiqtani Region

Environment Canada (EC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above-mentioned project proposal and is submitting comments on mitigation measures as well as other matters of importance to the project proposal as requested by the NWB. EC's specialist advice is provided pursuant to the *Canadian Environmental Protection Act 1999*, the pollution prevention provisions of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

Stantec Consulting Ltd. (the Proponent) is proposing to construct a temporary camp at Ile Vanier or Cameron Island, approximately 300km from Resolute Bay. The small camp will be used to house a field crew of 15 people for about 30 days as they complete an environmental remediation assessment. This project is part of the Contaminated Sites Directorate, a larger remediation program through Aboriginal Affairs and Northern Development Canada (AANDC) and Public Works and Government Services Canada (PWGSC). The proposed project activities and components include use of two all-terrain vehicles, two helicopters and a fixed wing aircraft for transportation with fuel to be stored on site.

Based on a review of the license application and supporting materials, EC provides the following comments for the NWB's consideration:

General

1. Subsection 36(3) of the Fisheries Act specifies that, unless authorized by federal regulation, no person shall deposit or permit the deposit of deleterious substances of any type in water frequented by fish, or in any place under any conditions where the deleterious substance, or any other deleterious substance that results from the deposit of the deleterious substance, may enter any such

water. The definition of a deleterious substance (Subsection 34(1) of the Fisheries Act) includes “any water that contains a substance in such quantity or concentration, or that has been so treated, processed or changed, by heat or other means, from a natural state that it would, if added to any other water, degrade or alter or form part of a process of degradation or alteration of the quality of that water so that it is rendered or is likely to be rendered deleterious to fish or fish habitat or to the use by man or fish that frequent that water.” Subsection 36(3) makes no allowance for a mixing or dilution zone at the point of deposit.

Spill Contingency Planning

2. Please note that according to the Aboriginal Affairs and Northern Development Canada's (AANDC) “Guidelines for Spill Contingency Planning” (April 2007), available at <http://www.aadnc-aandc.gc.ca/eng/1100100024236/1100100024253>, all releases of harmful substances, **regardless of quantity** are to be reported to the NWT / NU 24-hour Spill Line, (867) 920-8130 if the release is near or into a water body, is near or into a designated sensitive environment or sensitive wildlife habitat, poses imminent threat to human health or safety, poses imminent threat to a listed species at risk or its critical habitat, or is uncontrollable.
3. A spill kit including shovels, barrels, absorbents, pumps, etc. should be consistently maintained and readily available at all locations where fuel is being stored or transferred; Transfer operations should be attended by trained personnel at all times.¹
4. Fuel containers, including barrels, should be marked with the responsible party's name, product type, and year purchased or filled.²
5. The fuel caches should be inspected on a regular basis; the exact locations of all fuel caches should be reported to regulatory authorities, including EC, as soon as they are determined.³
6. EC recommends that a map of the camp with marked locations of fuel storage sites and spill kits should be attached to the Spill Contingency Plan and be posted in an area visible and accessible to camp occupants.⁴
7. The Proponent's Spill Contingency Plan should include the following:
 - A list of agencies / persons to be contacted in the event of a spill including their phone numbers, etc;
 - A list and indicating the location(s), both on and off site, of equipment available to be used in the event of a spill; and
 - Locations of disposal sites approved to accept wastes and means of storage prior to disposal.⁵

¹ Tank Tips 7 - Preparing your emergency plan (on Storage Tank Systems for Petroleum Products and Allied Petroleum Products Regulations)

² Tank Tips 6 - Identifying your system (on Storage Tank Systems for Petroleum Products and Allied Petroleum Products Regulations)

³ Tank Tips 10 - Record keeping for your storage tank system on Storage Tank Systems for Petroleum Products and Allied Petroleum Products Regulations

⁴ Aboriginal Affairs and Northern Development Canada's (AANDC) “Guidelines for Spill Contingency Planning” (April 2007) (Page 6)

Please do not hesitate to contact me at (867) 669-4744 or loretta.ransom@ec.gc.ca with any questions concerning the above points.

Sincerely,

A handwritten signature in black ink that reads "Loretta Ransom". The signature is written in a cursive, flowing style.

Loretta Ransom
Senior Environmental Assessment Coordinator, EPO

cc: Yongshu Fan, Senior EA Coordinator, Environmental Assessment and Marine
Programs-PNR, EC
Lindsay Howes, EA Officer, EAMP-PNR, EC

⁵ Aboriginal Affairs and Northern Development Canada's (AANDC) "Guidelines for Spill Contingency Planning" (April 2007)