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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

File No.: 1BR CLI0914/I1

January 26, 2010

Ms. Natalie Plato Director, Contaminated Sites Indian and Northern Affairs Canada P.O. Box 2200 Iqaluit, NU X0A 0H0

E-mail: platon@inac.gc.ca

RE: Revision Request for Spill Contingency Plan-Licence No. 1BR-CL10914, Type "B"

Dear Ms. Plato:

The Nunavut Water Board ("NWB") received the Plan entitled "Occupational Health & Safety: Clifton Point Pin B-DEW Line Cleanup" dated May 1, 2009. On September 17, 2009, the NWB acknowledged receipt of the Plan and distributed it for a public review with a deadline of October 17, 2009. No comments were received; however, previous comments received during the new application's public-review period from Indian and Northern Affairs Canada (INAC) on January 7, 2009 still apply. A thorough review of the plan and prior submissions has determined that the Plan must be revised and resubmitted within sixty (60) days of the date of this letter to address the following deficiencies:

- 1. The spill contingency plan should be a stand-alone document as opposed to an appendix of a document;
- 2. Include a cover page, date prepared and table of contents;
- 3. Include the mailing address and 24-hour contact number for the person responsible for the project;
- 4. Include a NT/NU Spill Report Form (available on NWB ftp site);
- 5. Include the date the plan was prepared and its effective period;
- 6. The emergency contact information for Environment Canada (EC), INAC and Government of Nunavut, Department of Environment, Environmental Protection (GN-EP) are out of date: the correct number for EC is 867-975-4644, for INAC's Manager of Field Operations, 867-975-4295, and for GN-EP, 867-975-7700; (please note INAC requests to be contacted in the event of any spill)
- 7. MSDS should be appended or reference provided for their on-site location;
- 8. Include a detailed site map in a suitable scale showing site structures including waste

- disposal areas, fuel/hazardous material storage location and spill kits in relation to ecologically sensitive areas and local water bodies;
- 9. The coordinates in longitude and latitude for the area of the undertaking must be stated;
- 10. Any spill in or with the potential to enter water shall be reported to the NT/NU Spill Line:
- 11. The Plan refers to sewage disposal via. Pacto Toilets and greywater disposal via. sump, the revised plan should address the two-cell sewage lagoon authorized under the Licence; and
- 12. Include a site inventory of all POL's and hazardous materials including product, location and quantity.

Please note that the sewage disposal methods identified in the Spill Contingency Plan do not appear consistent with the post construction method of sewage disposal authorized under part D, Items 8 and 9 of the conditions in licence. Should the Licensee wish to alter sewage disposal, an amendment or modification may be required.

Should you have any questions, please feel free to contact the undersigned at 867-360-6338 ext. 25 or by email at sjoseph@nunavutwaterboard.org.

Yours truly,

Sean Joseph Technical Advisor

cc: Qikiqtani Distribution List