9.0 Spill Contingency Plan

The Spill Contingency Plan (SCP) was prepared for the FOX-2, Longstaff Bluff clean up team consisting of members from the clean up contractor (TBD), Defence Construction Canada, Environmental Sciences Group, UMA Engineering Ltd., and EBA Engineering Consultants Ltd. The SCP is effective as of June 1, 2008 (exact start date of clean up TBD in 2008), and will be available as a stand-alone document to all team members and will also be posted on-site in the camp.

The clean up is being conducted as part of the DEW Line Clean Up Project, as represented by the Department of National Defence and Defence Construction Canada. To request additional information, or additional copies of the SCP, please contact:

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Environmental Officer – DEW Line Clean Up Project
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Ottawa, ON K1A 0K3

9.1 Introduction

The following contingency plan presents the prescribed course of action to be taken in the case of unanticipated spill events during the clean up of the FOX-2 site. The plans will enable persons in a particular situation to maximize the effectiveness of the environmental protection response and meet all regulatory requirements for reporting to the appropriate authorities.

9.1.1 Scope and Purpose

This plan applies to all activities and facilities pertaining to the construction activities at the FOX-2 site:

The purpose of the plan is to:

- Provide a clear statement of the procedures to be followed in response to all spills;
- Minimize the potential environmental impact of spills by establishing pre-determined action plans;
- Establish a state of preparedness for personnel through a Spill Response Training Program;
- Protect the health and ensure the safety of the personnel involved in the Spill Response activities;
- Provide a reporting network for spills;
- Ensure site restoration through appropriate remedial activities;
- Identify the roles and responsibilities of all parties involved in the Spill Response activities; and
- Identify sufficient personnel, materials and equipment needed to make an adequate response to a spill.

9.2 Site Information

It is estimated that the camp operation will require a combined total of approximately 350,000 litres of diesel and 20,000 litres of gasoline. Fuel is stored in double-walled tanks in a location situated a minimum of 100 metres from any water body or drainage course. Fuel is provided by the contractor.

Spill kits will be located at the fuel storage/handling area operated by the camp. It is anticipated that the camp, and all associated facilities including spill response equipment will be located at the camp area.

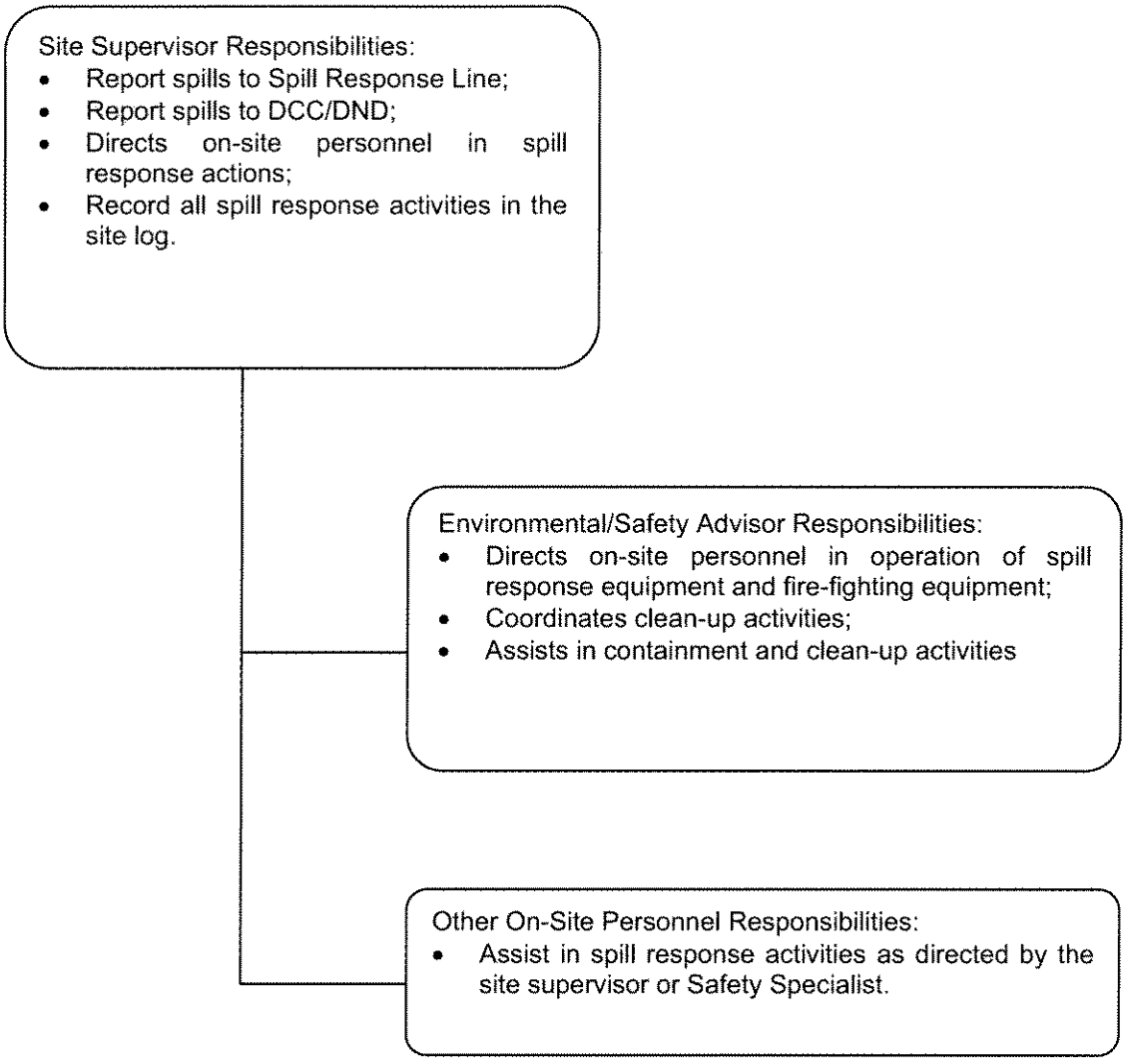
9.3 Response Organization

9.3.1 Roles and Responsibilities

The contractor and all sub-contractors will be involved in spill response actions in the event of a spill during the construction activities at FOX-2. Their roles and responsibilities are described as follows:

- Ensure the response crew members are appropriately trained.
- Practise spill prevention by performing regular maintenance on all fuel systems and by using proper methods for handling of fuel products.
- Provide personnel, materials, and equipment necessary for adequate response to fuel and hazardous material spills.
- Establish communications and verbally report all spills to the DCC Contract Coordinator as soon as practical.
- Isolate and eliminate all ignition sources.
- Ensure safety and security at the spill site.
- Stop or reduce discharge, if it is safe to do so.
- Make every effort to contain the spill by dyking with earth or other barriers on land and containment booms on water.
- Assess potential for fuel/chemical recovery.
- Deploy on-site crews to mobilize pumps, empty 200 litre barrels, hand tools and absorbents to the spill site.
- Hire additional assistance, if required, from northern residents, local communities, and commercial spill response firms.
- If required, request assistance from the DND (through the DCC Contract Coordinator) and the Canadian Coast Guard.
- Follow all guidelines and regulations for disposal of spilled materials, associated debris, contaminated soil and water as established by appropriate government agencies.
- Assess potential terrain and wildlife disturbance, erosion and archaeological site disturbance in any areas to be affected by clean up operations and contact relevant authorities.
- Document all events/actions.
- Report the spill to the Spill Report Line and follow up with a written spill report. This report shall summarize the initial report information; confirmation of spill volume; actions taken; future remediation/monitoring requirements; and a sketch map and/or photographs of the spill area.
- For spills on water, immediately mobilize additional containment and clean up equipment in consultation with the Coast Guard, Environment Canada, and Fisheries and Oceans Canada if on-site equipment is inadequate. Close isolation valves to stop fuel flow, if required. Deploy light-weight booms and oil absorbent materials to protect environmental resources along the coastline, as applicable. Track the progress of the spill, if of unknown origin.

Figure 1: Emergency Response Team Organization



Telephone, facsimile machines and e-mail are provided to on-site personnel to maintain communications with off-site parties. All on-site personnel are provided with two-way radios for all intra-site communications. Table 16 provides all other contact numbers. NOTE: The telephone and facsimile numbers and the e-mail addresses for the clean up contractor are not available at this time as the contract has yet to be awarded.

Table 16: Spill Contingency Plan - Contact List

Resource	Location	Phone No.
24 Hour Spill Line	NWT/Nunavut	867-920-8130
Environment Canada	Environmental Protection Branch	867-669-4700
Government of Nunavut – Environmental Protection	Iqaluit	867-975-5907
Indian and Northern Affairs Canada – Water Resources Inspector	Nunavut Regional Office	867-975-4550
Indian and Northern Affairs Canada – Land Administration Minister	Nunavut Regional Office	867-975-4280
Department of Fisheries and Oceans	Nunavut Regional Office	867-975-8000
Defence Construction Canada (representatives for the Department of National Defence)	Environmental Officer – Douglas Craig	613-998-7288
	Project Manager –LCol. David Eagles	613-998-9523

9.4 Reporting Procedures

When reporting a spill to the 24 Hour Spill Report Line and completing the GNWT Spill Report Form, the following information shall be included:

- Date and time of the spill;
- Location of the spill and direction the spill may be moving;
- Name and phone number of a contact person close to the location of the spill;
- Type of contaminant spilled and quantity spilled;
- Cause of the spill;
- Whether the spill is continuing or has stopped;
- Description of the existing containment;
- Action taken to contain, recover, clean up and dispose of spilled material;
- Name, address and phone number of the person reporting the spill; and
- Name of owner or person in charge, management or control of the contaminants at the time of the spill.

The spill report is to be submitted to the INAC Water Resources Officer no later than 30 days after initially reporting the spill to the spill report line. A copy of the NU Spill Report Form is attached. The contact list is provided in Table 16 in Section 9.3.1.

9.5 Action Plan

The following substances could potentially be spilled at the FOX-2 site:

- Diesel fuel
- Gasoline
- Lubricating oils;
- Solvents;
- Alcohols and glycols;
- PCB containing liquids; and
- Heavy metal containing liquids.

9.6 Initial Action

In the event of a spill, protection of human health and safety is paramount. Contamination of personnel involved in a clean up is a real possibility, as is contamination of the surrounding workplace and environment.

The individual discovering a spill shall:

- Warn the people in the immediate vicinity and evacuate if necessary.
- Isolate or remove any ignition sources.
- Identify the spilled material, if possible, and take all safety precautions before approaching it.
- Locate the source of the spill.
- Attempt to stop the leakage and contain the spill, if safe to do so.
- Assess the likely size, extent and condition of the spill.
- Report to the DCC Contract Coordinator the spill location, type of material, volume and extent, status of spill (direction of movement), and prevailing meteorological conditions.
- In the event of a shoreline spill, provide information about the beach location, contaminated area, beach characteristics, presence of wildlife and archaeological sites that may be threatened.

Once the DCC Contract Coordinator has been contacted and arrives at the spill site, the following actions are to be taken:

- Assess the severity of the spill via direct observation and/or information from communications.
- Deploy equipment and personnel to initiate containment and clean up.
- Prepare the Government of the Northwest Territories Spill Report Form.
- Notify all other pertinent parties, including the DND and other government agencies.

Figure 2 provides the initial response actions to be taken in the event of a spill, and Figures 3 and 4 provide the actions to be taken in the event of a fuel spill on land and on water, respectively.

Figure 2: Initial Response Actions

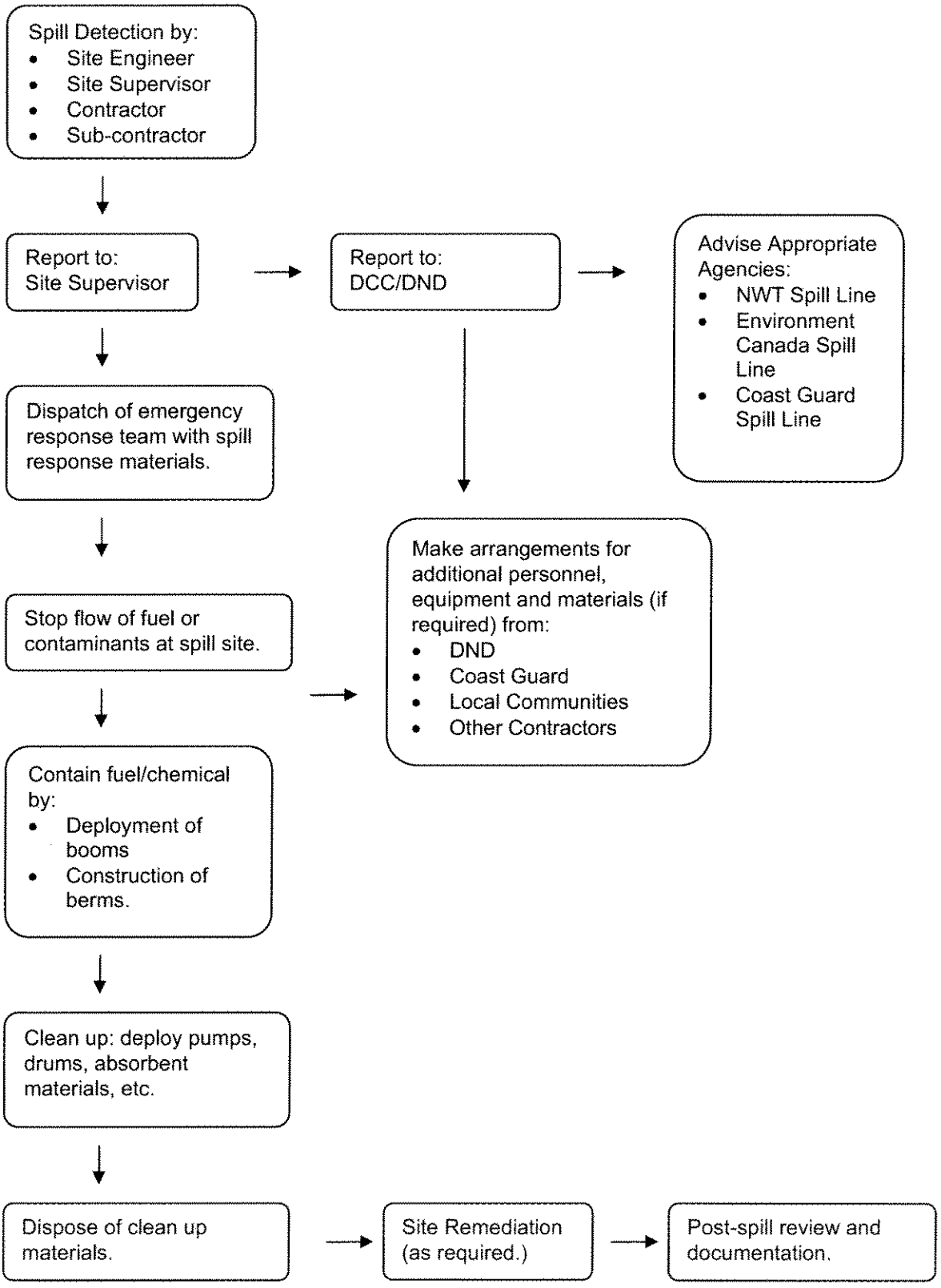


Figure 3: Procedures for Land Spill Response

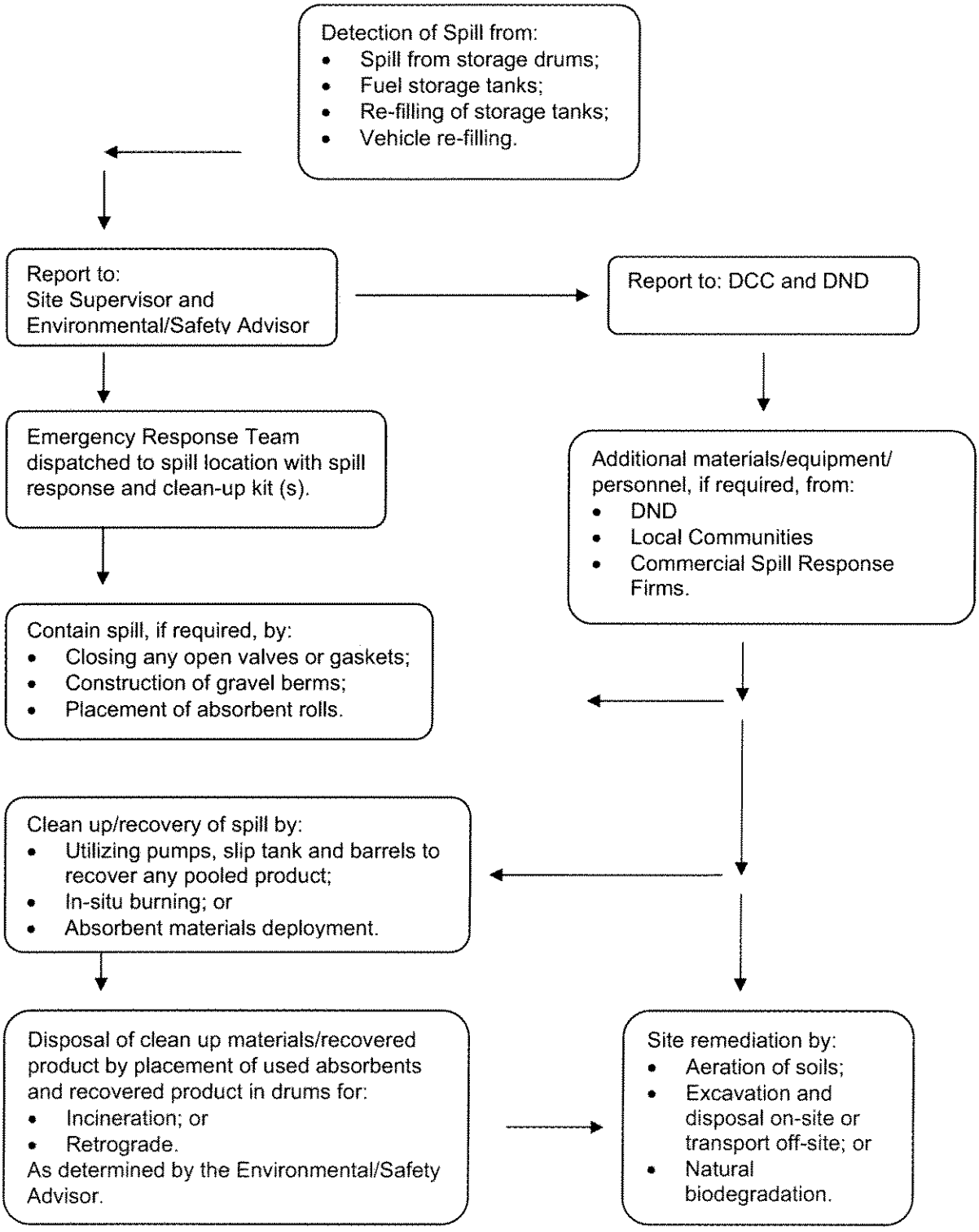
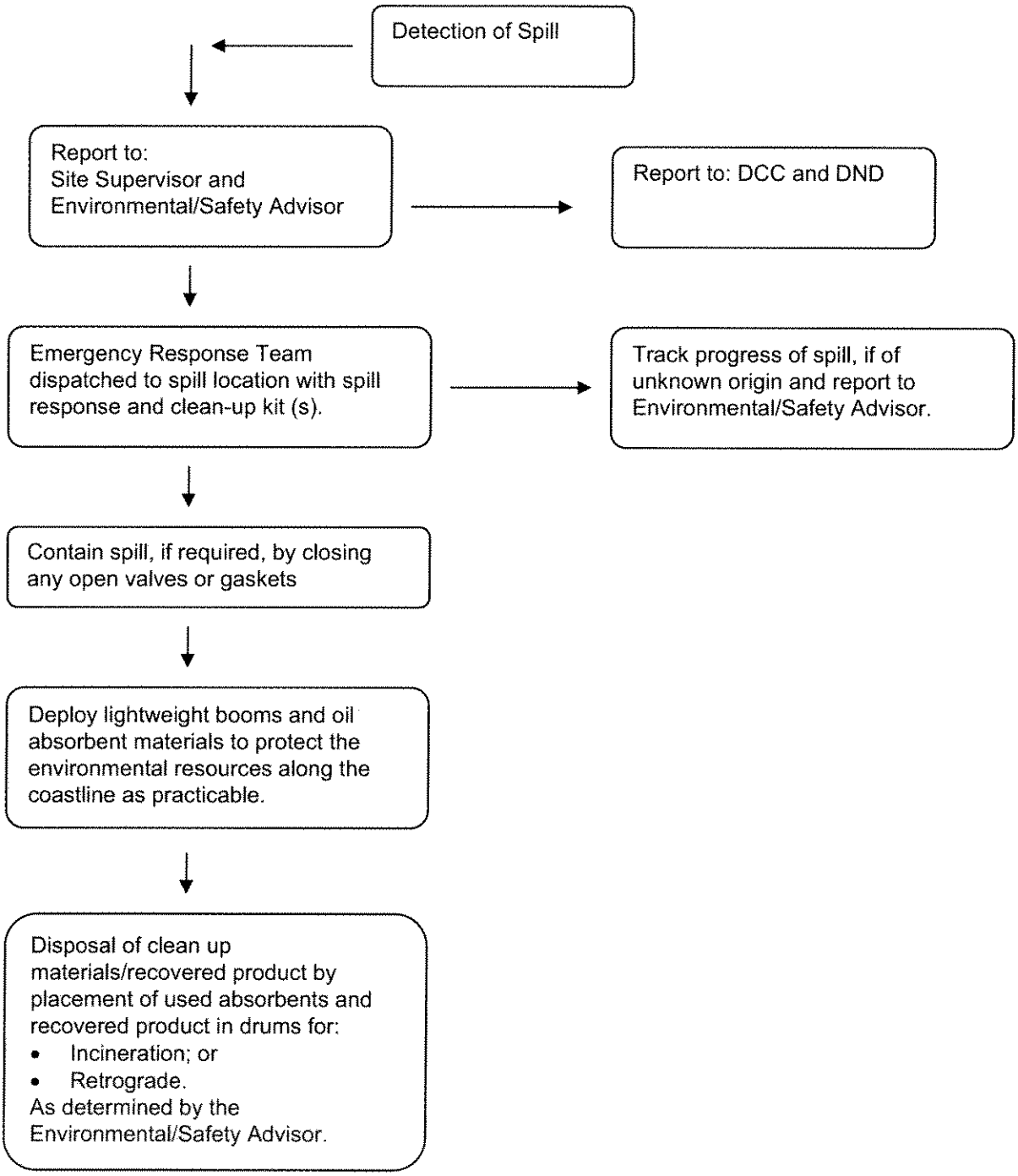


Figure 4: Procedures for Freshwater and Marine Spill Response



9.6.1 General Procedures

The environmental protection measures outlined in the following sections are to be taken by all workers on-site to reduce the chance of environmental impairment due to a spill, release or other incident. The following general clean up procedures shall apply for all spill areas:

- Wear protective clothing as required for handling spills.
- Contain spills on soil or rock by construction of earthen dykes using available material. If soil is not available, place sorbent material or a boom in the path of the spill. As the sorbent barrier becomes saturated, continually replace it. Fuel or other liquids lying in pools, trenches or in specially constructed troughs are to be removed with pumps, buckets or skimmers.
- If the ground is snow-covered, create snow dykes and line with a chemically compatible liner for containment and recovery of liquid.
- For fuels on water, deploy containment booms and recover as much fuel as possible with a work boat and skimmer if the area has less than 1/10 ice cover. If the area is ice infested, burn any fuel spills using igniters.
- Apply sorbents if necessary.
- Assess potential for disturbance of wildlife, fish and archaeological sites by spill or clean up operations and notify the relevant authorities.
- Notify environmental authorities to discuss disposal and clean up options.
- Conduct required clean up operations.
- Assess and appropriately treat any areas disturbed by clean up activities.
- Ensure the site has been completely restored and leave the site only when all work is finalized.

9.6.2 Fuel Storage Areas

In order to prevent spill or accidents at fuel storage areas, the following procedures apply:

- Avoid sites that slope towards waterways or other environmentally sensitive areas, exhibit ponding or flooding, have high groundwater tables, and/or excessive seepage or ice-rich (thaw sensitive) soils.
- Avoid archaeological resources.
- Conduct fuelling and equipment lubrication in a manner that avoids spillage of fuels, oils, greases and coolants. When refuelling equipment, operators are to use leak-free containers, reinforced rip and puncture proof hoses and nozzles, and drip trays. Operators are to be in attendance for the duration of the refuelling operation and are to ensure that all storage container outlets are properly sealed after use.
- Store fuel in self-dyking containers, or position over an impervious liner and surround by an impervious dyke of sufficient height to contain not less than 110% of the capacity of the tank(s).
- Smoking is prohibited within 7.5 metres of the fuel storage facility. Provide appropriate signage.
- Inspect fuel storage facilities at least once each week for the duration of the project. Fire-fighting equipment will be made available for immediate access at each and every fuel storage facility.
- Store all barrels containing fuel and/or other hazardous materials in an elevated position either on their side with the bungs facing the 9 and 3 o'clock position or on pallets, upright, banded and encased in overpack containers.
- All barrels shall be individually identified. The label is to be to industry standards and should provide all information necessary for health and safety, and environmental purposes. Material Safety Data Sheets for all materials maintained in the construction camp will be available for all personnel.
- Treat all waste petroleum products, including used oil filters, as hazardous material and handle and dispose as per the requirements specified in the appropriate regulations.
- Conduct regular inspections of all machinery hydraulic, fuel and cooling systems. Repair leaks immediately.

- Pre-assemble and maintain emergency spill response equipment including at least two fuel pumps, empty 200 litre barrels and absorbent material sufficient to clean up a 1000 litre spill at all permanent fuel storage sites.
- Remove all barrels, redundant fuel storage sites and associated materials and equipment from the site at the conclusion of the work.

9.6.3 Hazardous Material Storage Areas

Hazardous waste materials are wastes or materials that are designated as "hazardous" under Nunavut or Federal legislation; or as "dangerous goods" under the *Transportation of Dangerous Goods Act* (TDGA). The *Canadian Environmental Protection Act* (CEPA) regulates material containing PCBs at greater than 50 ppm. The hazardous material storage areas will be managed as outlined below:

- Hazardous waste materials may be encountered during sorting of site and demolition debris and during the excavation of the landfills. Collect and sort hazardous materials using equipment suitable for the task.
- Locate the hazardous material processing area a minimum of 100 metres from the nearest archaeological site or water body, on ice poor, well drained soil, and as close to the location of work as possible.
- Control movement of vehicles and equipment between the hazardous materials processing area and work site to prevent the spread of potentially hazardous material along roadways.
- Store hazardous materials so that each storage area is separated from the nearest water body by a 30 metre buffer zone.
- The TDGA and the *International Air Transport Association* (IATA) *Dangerous Goods Regulations* govern the packaging and shipment of hazardous goods within Canada. If shipping out of Canada, Canadian regulations and the regulations of the destination country both apply. Requirements of the IMDGC must be addressed in international waters (i.e., near Greenland).
- Any material classified as hazardous by the TDGA must be accompanied by the appropriate TDGA shipping documents. The documents are to state the shipper, the receiver and all carriers involved in the transport of the shipment. Non-hazardous materials are also to be accompanied by a document indicating ownership and responsibility of the receiver.
- Package all hazardous material in accordance with the TDGA regulations.

NOTE: MSDS and other information on hazardous materials are to be provided by the contractor once the clean up activities begin.

9.7 Potential Safety Hazards

The most significant potential safety hazard related to a fuel spill at the FOX-2 site is the possible soil and water contamination from the spill. The fuel storage area is located away from waterbodies and watercourses to avoid this hazard. Although soil contamination is a real potential hazard, the likelihood is small, spill volumes are small, and finally, any soils contaminated by a potential fuel spill can be cleaned up as part of the construction/clean up of the site.

9.8 Environmental Mapping

The drawings in Appendix A show the overall site plan and the project layout, which identify the locations of site facilities and the work areas. Once the camp is established, the locations of all spill response equipment can be noted and provided to on-site personnel.

Work areas, waterbodies, topography, etc., are also shown on the drawings.

9.9 Resource Inventory

The following equipment is typically found on-site during a clean up program. The exact type of equipment found at the FOX-2 site may vary slightly.

- Pick-up trucks
- Fuel truck
- Excavators
- Bulldozers
- Loaders
- Rock trucks and haul units
- Compaction equipment
- Large spill kits
- Small spill kits
- Generators
- Screening plant
- Crushing plant

All equipment is generally stored at the construction camp/storage area where the camp personnel are stationed. Some equipment may be stored in the area in which the equipment is being used. All vehicles are to be equipped with absorbent materials, drip trays, shovels and disposal bags.

9.10 Training and Exercises

The spill response training program will provide instruction in all aspects of spill response stated in the plan for all on-site personnel. Spill response training will include the following subjects:

- Spill awareness and prevention;
- Methods of detection;
- Storage and distribution systems;
- Storage of products on-site;
- Types of spills and seasonal considerations;
- Reporting procedures and initial responses;
- Spill response kit familiarization;
- Clean up and site remediation methods;
- Occupational health and safety; and
- Post spill review process and documentation.

NOTE: Spill response training is provided by the contractor.