Contingency Plan for the Clean Up of the CAM-4, Pelly Bay DEW Line Site



Prepared for: Nunavut Water Board

Prepared by: UMA Engineering Ltd.

February 2002

File: 0171-095-68-08



February 20, 2002

File: CAM-4 3.6

Ms. Rita Becker Licensing Administrator Nunavut Water Board P.O. Box 119 Gjoa Haven, NU X0B 1J0

Dear Ms. Becker:

RE: Contingency Plan for the Clean Up of the CAM-4, Pelly Bay DEW Line Site

On behalf of Defence Construction Canada (DCC), we are submitting a revised version of the Contingency Plan for the clean up of CAM-4, Pelly Bay. The Contingency Plan was completed as per the Northwest Territories Water Board, *Guidelines for Contingency Planning*, dated January 1987.

If there are any questions or concerns regarding the information presented in this report, please contact us at (403) 270-9200.

Sincerely,

UMA ENGINEERING LTD.

Eva Schulz, P.Ag.

Environmental Scientist

cc: Suzanne Fontaine, DCC

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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 CAM-4 site. The plans will enable persons in a particular contingency situation to maximize the effectiveness of the environmental protection response and meet all regulatory requirements for reporting to the appropriate authorities. This plan is an integral part of the Environmental Protection Plan (EPP), which is a part of the formal contract documents with the Contractor(s).

1.1 Scope and Purpose

This plan applies to all activities and facilities pertaining to the clean up activities at the CAM-4 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 Training Program;
- Protect the health and ensure the safety of the personnel involved in the spill response activities, and the local communities;
- Provide a reporting network for spills;
- Ensure site restoration through appropriate remedial activities;
- Identify the roles and responsibilities of all parties involved in spill response activities; and,
- Identify sufficient personnel, materials and equipment needed to make an adequate response to a spill.

2. RESPONSE ORGANIZATION

2.1 Responsibilities

The Contractor and all sub-contractors will be involved in spill response activities in the event of a spill during the clean up at CAM-4. The responsibilities are described as follows:

- Ensure response crew members are appropriately trained;
- Practise spill prevention by performing regular maintenance on all fuel systems and by using proper methods for the 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 Site Supervisor as soon as practical;
- Isolate and eliminate all ignition sources;
- Ensure safety and security at the spill site;
- Stop or reduce discharge, if 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 L drums, hand tools and absorbents to the spill site;

- Hire additional assistance, if required, from northern residents, local communities, and commercial spill response firms;
- Request assistance, if required, from Department of National Defence (DND) through the Site Supervisor 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.

Please see the organizational structure of the response team in Figure 1 following this section.

Telephone, facsimile machines and e-mail are provided to on-site personnel to maintain communications with off-site parties. All intra-site communications occur via two-way radios. All on-site personnel are provided with radios. Table 1 provides all other contacts.

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NOTE: The telephone and facsimile numbers, and the e-mail addresses are not available at this time, as the contractor has suspended clean up activities until late spring 2002. Once the Contractor has re-established clean up activities, including communications, at the site, these numbers and addresses will be forwarded to the Nunavut Water Board.

Table 1: Contact List

Resource	Location	Phone No.
24 Hour Spill Line	NWT/Nunavut	867-920-8130
Iqaluit Fire Department	Nunavut	867-979-4422
Environment Canada, Environmental Protection	Yellowknife Contact: Laura Johnson – Manager	867-669-4700
Branch	Iqaluit Contact: Sid Bruinsma – Manager	867-975-4636
Indian and Northern Affairs Canada	Iqaluit Region District Manager - Dan Elliot	867-979-4405
Renewable Resources Officer	Iqaluit	867-979-5017
Stations - Baffin Region	Broughton Island	867-927-8966
	Hall Beach	867-928-8819
Renewable Resources Officer	Regional Office (Kugluktuk)	867-982-7240
Stations - Keewatin and Inuvik	Taloyoak	867-561-6231
	Gjoa Haven	867-360-7605
	Cambridge Bay	867-983-7314
GN Environmental Protection	Iqaluit; contact Earle Baddalo	867-975-5910
Contractor Company Officials	Mario Mercer	514-352-2565
(Nunatta Environmental Services Inc.)	Luc Paquet	450-778-9397
Services me.,	Richard Phanuef	514-524-2670
	Pierre Duquet	450-652-0465
Department of National	Environmental Officer – Suzanne Fontaine	613-991-9358
Defence through the contracting agency Defence	Contract Manager – Shawn Helmerson	613-998-4511
Construction Canada	Deputy Project Manager – Scott Munn	613-990-9641
	Project Manager – Pete Quinn	613-998-9523

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Figure 1: Emergency Response Team Organization

Site Supervisor Responsibilities:

- Report spills to Spill Response Line;
- Report spills to DCC/DND;
- Directs on-site personnel in spill response actions;
- Record all spill response activities in the site log.

Environmental/Safety Advisor Responsibilities:

- Directs on-site personnel in operation of spill response equipment and fire-fighting equipment;
- Coordinates clean-up activities;
- Assists in containment and clean-up activities

Other On-Site Personnel Responsibilities:

 Assist in spill response activities as directed by the site supervisor or Safety Specialist.

3. 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:

- 1. Warn people in the immediate vicinity and evacuate the area if necessary.
- Isolate or remove any ignition sources.
- 3. Identify the spilled material, if possible, and take all safety precautions before approaching it.
- 4. Locate the source of the spill;
- 5. Attempt to immediately stop the leakage and contain the spill, if safe to do so.
- Assess the likely size, extent and condition of the spill.
- 7. Report to the Site Supervisor 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 beach location, contaminated area,
 beach characteristics, presence of wildlife and archaeological sites which might be threatened.

Once the Site Supervisor 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;

- 2. Deploy equipment and personnel to initiate containment and clean up;
- 3. Prepare the Government of the Northwest Territories Spill Report Form;
- 4. Notify all other pertinent parties, including the Owner of the site, and other Government agencies.

Please see Figure 2, which outlines the initial response actions to be followed in the event of a spill. Figures 3 and 4 outline the specific response procedures to be followed in the event of spills on land and water, respectively.

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Figure 2: Initial Response Actions Report to: Advise Appropriate DCC/DND Agencies: NWT Spill Line Environment Canada Spill Line of Coast Spill Guard Line spill Make arrangements for additional personnel, equipment fuel/ and materials (if required) from: DND of Coast Guard **Local Communities** Other Contractors

Spill Detection by: Site Engineer Site Supervisor Contractor Sub-contractor Report to: Site Supervisor Dispatch emergency response team with response materials. Stop flow of fuel or contaminants at spill site. Contain chemical by: Deployment booms Construction berms. Clean up: deploy drums, pumps, absorbent materials, Site Dispose of clean up Post-spill review Remediation materials. and (as required.) documentation.

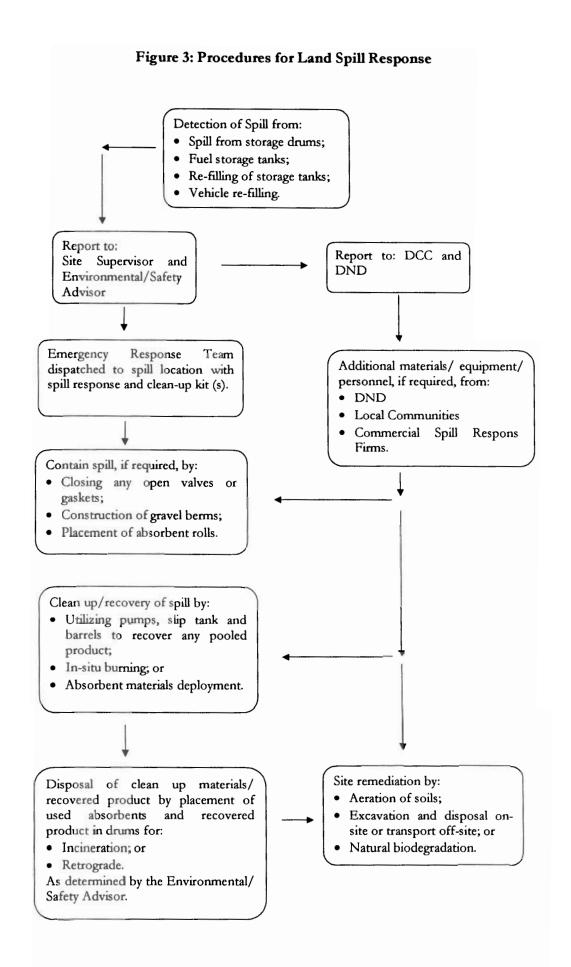
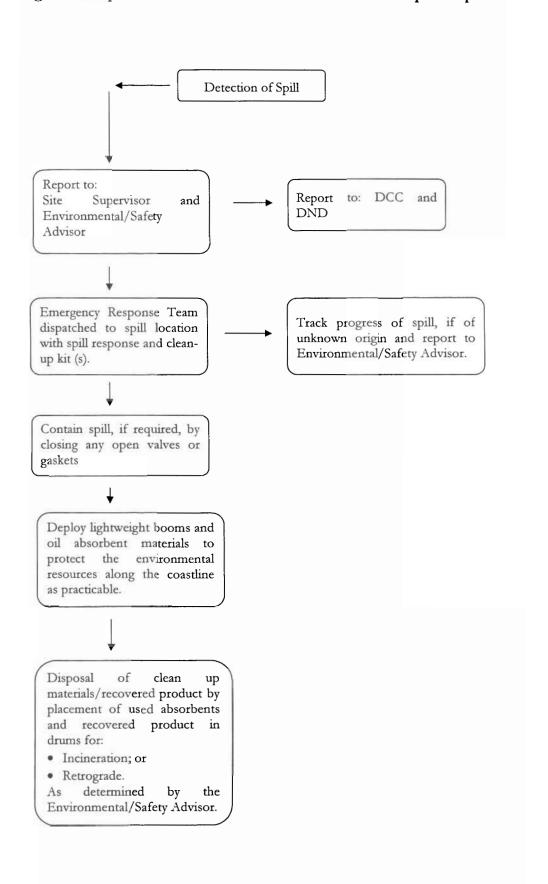


Figure 4: Response Procedures for Freshwater and Marine Spill Response



4. REPORTING PROCEDURE

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

- Date and time of spill;
- Location of spill;
- 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 spill;
- Whether spill is continuing or has stopped;
- Description of existing containment;
- Action taken to contain, recover, clean up and dispose of spilled contaminant;
- Name, address and phone number of person reporting the spill; and,
- Name of owner or person in charge, management or control of contaminants at the time of the spill.

	SPILL REPORT (rnone: 867-92	0-0130)		
A	T TOTAL TOTA	ite and Time of S			
В	Location and Map Coordinates (if know	n) and Direction	if Moving		
С	Party Responsible	000.000			
D	Product Spilled and Estimated Quantition	roduct Spilled and Estimated Quantities (Provide Metric Volumes/Weights if possible)			
Е	Cause of Spill				
F	Is Spill Terminated or Continuing				
G	Extent of Contaminated Area				
Н	Factors Affecting Spill or Recovery – T	emperature, Win	d, Snow, Ice, Terrain, Buildings, etc.		
Н	Factors Affecting Spill or Recovery – T Containment – Natural, Booms, Dykes				
		or Other. No (Containment.		
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I J K	Containment – Natural, Booms, Dykes Action, if any, Taken or Proposed to Co Do You Require Assistance?	or Other. No Contain, Recover,	Containment. Clean-up or Dispose o, What Form?		
I J K L	Containment – Natural, Booms, Dykes Action, if any, Taken or Proposed to Co Do You Require Assistance? Hazard to Persons or Property or Envir	or Other. No Contain, Recover,	Containment. Clean-up or Dispose o, What Form?		

5. ACTION PLAN

The following substances could potentially be spilled at the CAM-4 site:

- Fuel tank bottom sludges;
- Solvents;
- Fuels and lubricating oils;
- Alcohols and glycols;
- PCB containing liquids; and
- Heavy metal containing liquids.

5.1 Environmental Protection Measures

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 accident.

5.1.1 General Procedures

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 constructing earthen dykes using available material. If soil is
 not available, place sorbent material or boom in path of 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 ground is snow covered, create snow dykes and line with a chemically compatible liner for containment and recovery of liquid.
- For fuel spills on water, deploy containment booms and recover as much fuel as possible with a 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.

5.1.2 Fuel Storage Areas

- Avoid sites that slope towards waterways or other environmentally sensitive areas, exhibit
 ponding or flooding, or have high groundwater tables, excessive seepage or ice-rich (thaw
 sensitive) soils. Avoid archaeological resources.
- Conduct fuelling and lubrication of equipment in a manner that avoids spillage of fuels, oils, greases and coolants. When refuelling equipment, operators are to use leak-free containers and reinforced rip and puncture proof hoses and nozzles. 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.

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- 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 that 110% of the capacity of the tank.
- 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. Firefighting equipment is to be 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 shall be to industry standards and shall
 provide all information necessary for health and safety, and environmental purposes. Make
 available, to all personnel, Material Safety Data Sheets for all materials maintained in the
 construction camp.
- Treat all waste petroleum products including used oil filters as hazardous material, and handle
 and dispose of following the requirements as 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 equipment including as 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 and work camps.
- Remove all barrels, redundant fuel storage facilities and associated materials and equipment from the site at the conclusion of the work.

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5.1.3 Hazardous Material Storage Areas

Hazardous waste materials are wastes or materials that are designated as "hazardous" under Northwest Territories 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 parts per million (ppm).

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 material 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 Transportation of Dangerous Goods Act (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 regulations of the destination country both apply. Requirements of the International Marine Dangerous Goods Code (IMDGC) must be addressed in international waters (e.g. near Greenland).
- Any material classified as hazardous by the TDGA must be accompanied by the appropriate
 TDG shipping documents. The documents are to state the shipper, the receiver and all

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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 <u>Transportation of Dangerous Goods</u> <u>Regulations</u>.

NOTE: Material Safety Data Sheets for all fuels and chemicals stored on-site are to be made available by the Contractor at the start of the 2002 construction season, likely in June 2002. Once this information has been received from the Contractor, it will be forwarded to the Nunavut Water Board.

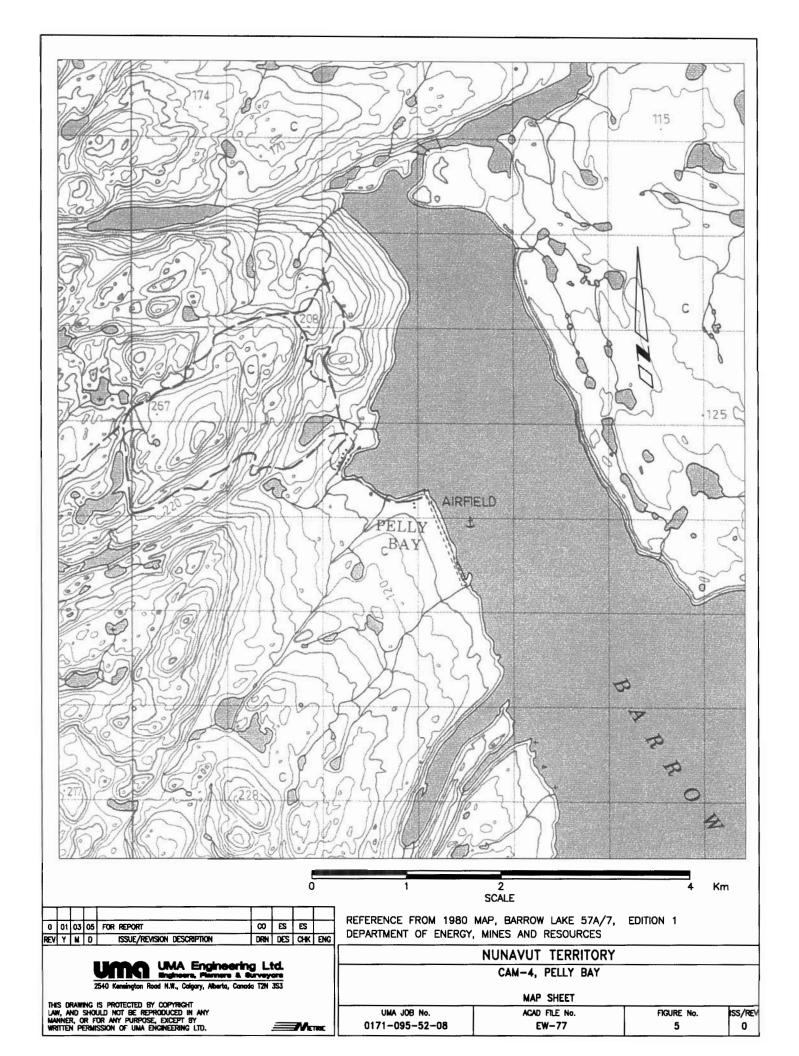
5.2 Spill Recovery Success

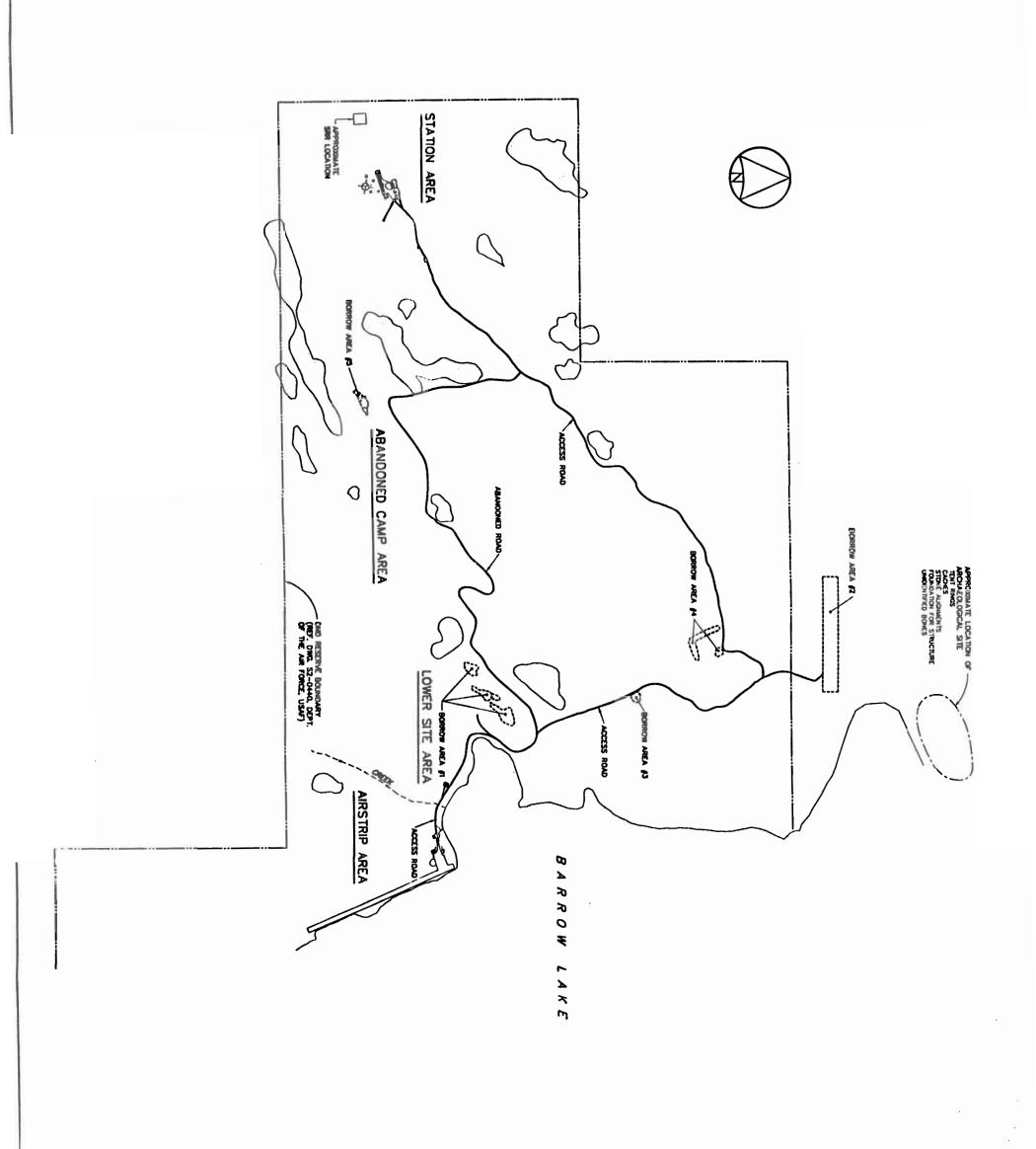
In order to determine whether a spill has been successfully remediated, samples of soil and/or water are to be collected and tested for the chemical parameters contained in the spill material. If concentrations of the spill chemicals are not detected, or are at concentrations below the applicable Territorial or CCME criteria, the spill clean up will be determined a success.

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6. ENVIRONMENTAL MAPPING

Figure 5 shows a topographic map segment of the site and Drawings 101, 102 and 103 include an overall site plan and the project layout showing the location of the site facilities and construction/clean up camp. Figure 5 and the drawings are included at the end of this section.





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OVERALL SITE PLAN

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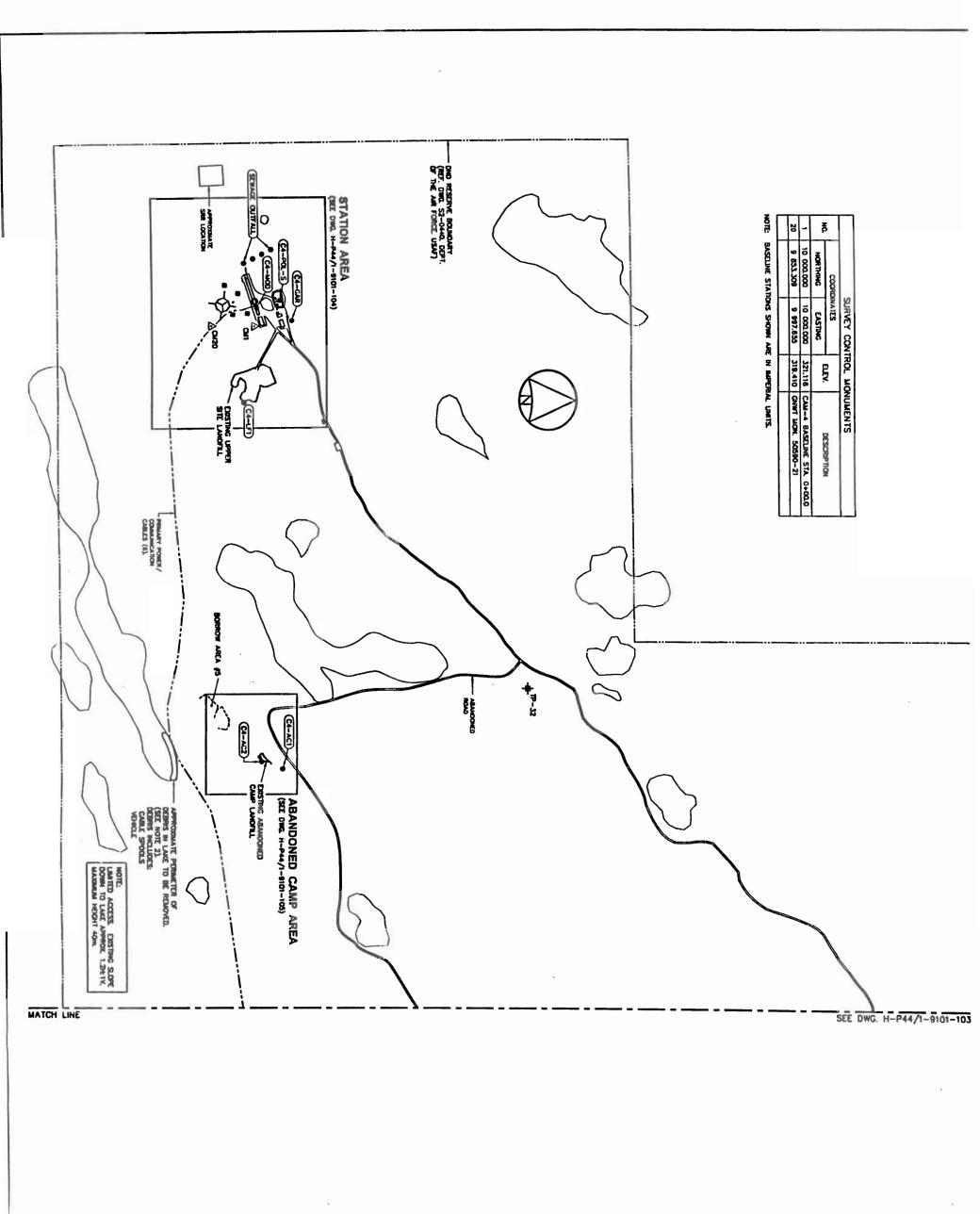
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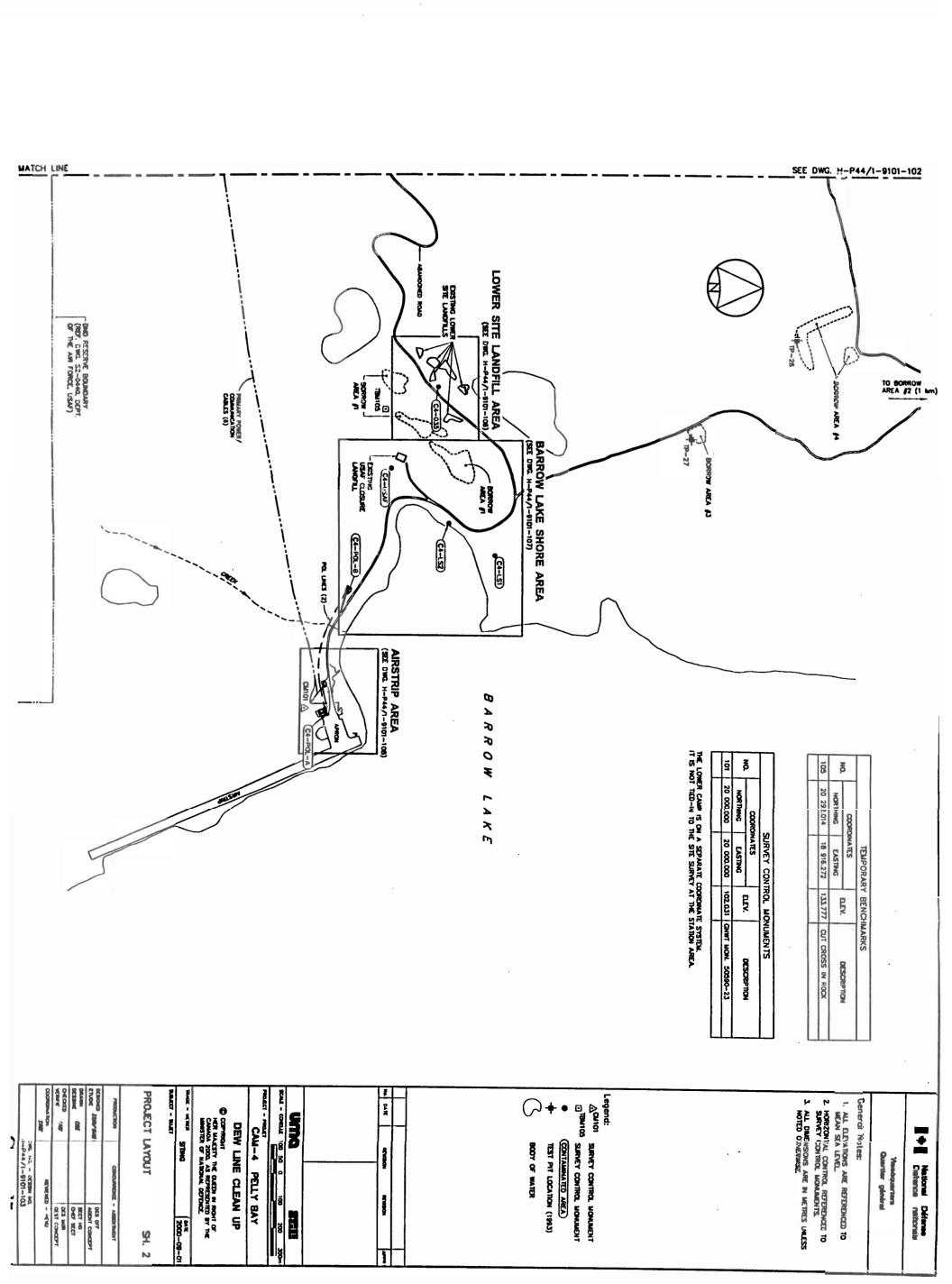
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General Notes:

1. ALL ELEVATIONS ARE REFERENCED TO MEAN STA LEVEL. (REF. DWG. AAP-2, DEPT. OF THE ARE FORCE, USAF).

Mattered Défense nationals Handquarters Cuartier général



7. RESOURCE INVENTORY

The following equipment is typically found on-site during a clean up program. The exact type of equipment found at the CAM-4 site may vary slightly.

- 3 Cat 966 front-end loader or equivalent with buckets, snow plow and forks
- 2 Cat D7 bulldozer or equivalent with blade and ripper
- 1 Cat D3 bulldozer or equivalent with blade and backhoe
- 3-6 End-dump or body-job gravel trucks
- 1 Fuel truck
- 1 Platform/Flatbed truck
- 1 Crane
- 2 Hitachi 200 Excavator or equivalent
- 1 Cat C5563 compactor or equivalent
- 1 Tow behind packer (smooth drum or sheep foot)
- 1 Truck/track mounted drill rig (percussion or rotary)
- 5 All terrain vehicles
- 5 pick-up trucks (1 service truck)
- Generators
- 1 Water truck
- 1 Screening Plant
- 1 Crushing Plant (less common)

Other resources available in the event of a spill could be provided by Kugaruuk (formerly Pelly Bay), located 20 kilometres to the northwest of the CAM-4 site.

All equipment is generally stored at the construction camp/storage area where the camp personnel are stationed. Some equipment may be stored at the area in which the equipment is being used.

However, because of the relatively compact size of the CAM-4 site, deployment to a potential spill area would be immediate.

All vehicles are to be equipped with absorbent materials, drip trays, shovels and disposal bags.

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8. TRAINING AND EXERCISES

Each employee is to go through a Worker Orientation Seminar prior to the start of each construction season, in addition to on-site training and other specific training requirements. Other training requirements include the 40 hour training course for Hazardous Waste Activities in compliance with OSHA 29 CFR 1910.120 and training in the Transportation of Dangerous Goods Act.

Specifically, the spill response training program is to include the following subjects:

- Spill Awareness and Prevention;
- Methods of Detection;
- 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 to be conducted on-site by Qualified Personnel, and is to include simulated spill response procedures.

<u>APPENDIX I</u>

Information Sources

Information Sources

Northwest Territories Water Board. 1987. Guidelines for Contingency Planning. Prepared by the Northwest Territories Water Board Technical Advisory Committee. January 1987.

Nunatta Environmental Services Inc. 2001. Work Methodology Plan – Preliminary Version. Prepared by Nunatta Environmental Services Inc. July 2001.

UMA. 2001. Specifications for the Cleanup of CAM-4 Pelly Bay DEW Line Site. Prepared by UMA Engineering Ltd., in association with The SGE Group Inc. February 2001.