

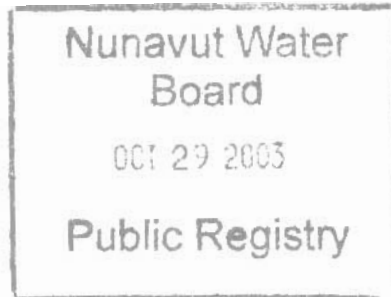


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Environnement Canada

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Date: October 29, 2003

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EXT.	Via facsimile

RE: NWB5QIK0207 – Spill Contingency Plan

On behalf of Environment Canada (EC), I have reviewed the information submitted with the above-mentioned application. The following comments are provided pursuant to Environment Canada's mandated responsibilities for the enforcement of the *Canadian Environmental Protection Act*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

UMA Engineering of Yellowknife has submitted a Spill Contingency Plan for the anticipated clean up procedures at the FOX-5, Broughton Island Dew Line Site. As is, this plan is not complete and Environment Canada suggests that changes be made to provide additional detail in some sections. The following additions are recommended:

- The proponent has provided a general list of substances that could potentially be spilled at the FOX-5 site. MSDS sheets should be available on site for all such substances.
- In *Section 2.1*, the proponent recommends that "all guidelines and regulations for disposal of spilled materials, associated debris, contaminated soil and water as established by appropriate government agencies" be followed. The contingency plan should identify what these guidelines are for the specific substances to be encountered at this site.
- The spill plan should identify what specific and potential risks are involved in the different stages of clean-up and provide specific guidance for response.
- In *Section 7. Resource Inventory*, the proponent does not identify what resources are available from the Hamlet of Qikiqtarjuaq. The proponent must ensure that logistical planning is done in advance for use of such off-site resources, i.e., that the Hamlet is prepared, and aspects such as transportation availability are planned.
- Spill kits, shovels, barrels, sorbents, pumps, etc. shall be consistently maintained and readily available onsite.
- Please provide information regarding disposal and transportation method of any contaminated and/or hazardous material to be removed from the site.
- Environment Canada requests clarification regarding the storage capacity and structural integrity of any used barrels that may be used for storage and transportation of any contaminated and/or hazardous substances to be removed from the site.



Environment Canada also recommends that the following conditions be applied throughout all stages of the project:

- The proponent shall not deposit, nor permit the deposit of chemicals, sediment, wastes, or fuels associated with the project into any water body. According to the Fisheries Act, Section 36 (3), the deposition of deleterious substances of any type in water frequented by fish, or in any place under any conditions where the deleterious substance, or any deleterious substance that results from the deposit of the deleterious substance, may enter any such water, is prohibited.
- Environment Canada recommends the use of an approved incinerator for the disposal of combustible material.
- If fuel is to be stored on site, Environment Canada recommends the use of secondary containment such as self-supporting Insta-berms. Also, please provide information regarding the amount of fuel to be stored on site.
- Environment Canada recommends the use of drip pans, or other similar preventative measures, when refueling equipment on site.
- If used, all sumps and fuel caches shall be located above the high water mark of any waterbody and in such a manner as to prevent the contents from entering any waterbody frequented by fish. Further, all sumps shall be backfilled upon completion of the project and recontoured to match the surrounding landscape.
- Except for immediate use, the permittee shall not store material on the surface ice of any waterbody.
- If maintenance work is to be done on the gravel roads near or leading to any water source, EC recommends that measures be taken to ensure that there is no sedimentation of the waterbodies as a result of such work.
- The proponent shall ensure that all hazardous wastes, including waste oil, receive proper treatment and disposal at an approved facility.
- **All spills** are to be documented and reported to the NWT 24 hour Spill Line at (867) 920-8130.
- Please ensure that all contact names and telephone numbers in Table 1 are up to date. Please note that Earle Badaloo is not currently working with Environmental Protection in Iqaluit.

If there are any changes in the proposed project, EC should be notified, as further review may be necessary. Please do not hesitate to contact me with any questions or comments with regards to the foregoing at (867) 975-4631 or by email at ivy.stone@ec.gc.ca.

Yours truly,



Ivy Stone
Environmental Assessment

cc: (Mike Fournier, Northern Environmental Assessment Coordinator, Environment Canada, Yellowknife)