Preliminary SPILL CONTINGENCY PLAN

Roberts Bay Mine and Ida Bay Silver Deposit

Submitted by: Department of Indian Affairs and Northern Development

Northern Affairs Program Nunavut Regional Office

Prepared by: Public Works and Government Services Canada

Real Property Services

Architectural & Engineering Services

Environmental Services

Western Region

Contingency Plans

1 General

- 1.1 The following contingency plans present the prescribed course of action to be followed in the case of unanticipated events during the site remediation such as fuel or chemical spills, potentially dangerous wildlife encounters, and the discovery of heritage resources. The plans will enable persons in a particular contingency situation to maximize the effectiveness of the environmental response and meet all regulatory requirements for reporting to the appropriate authorities. The plans also describe the locations where hydrocarbons (fuel) and spill response equipment will be stored at the site.
- 1.2 Spill contingency plans for the site will be included in the Site Specific Remediation Plans and will be posted on-site during the remediation. The following information will be included:
 - 1. a description of pre-emergency planning;
 - 2. personnel roles, lines of authority and communication;
 - 3. emergency alerting and response procedures;
 - 4. evacuation routes and procedures, safe distances and places of refuge;
 - 5. emergency alerting and response procedures;
 - 6. directions/methods of getting to the nearest medical facility;
 - 7. emergency decontamination procedure;
 - 8. emergency medical treatment and first aid;
 - 9. emergency equipment and materials;
 - 10. emergency protective equipment;
 - 11. procedures for reporting incidents; and
 - 12. spill response and containment plans for all materials that could potentially be spilled.

2 Fuel and Hazardous Material Spills

- 2.1 The objective of the fuel-related contingency plan is to protect the environment and human health by minimizing the impacts of spill events through clear and concise instructions to all personnel.
- 2.2 A variety of fuels (diesel, gasoline and lubricating oils) may be used during the site remediation of the DEW Line sites. As fuels are usually stored and transferred in barrels of 205 liters or smaller capacity, any spill quantity would likely be small.
- 2.3 Transportation of fuels must comply with the *Transportation of Dangerous Goods Act and Regulations*.

- 2.4 The most common pollution incidents would probably involve spills of diesel or gasoline onto land resulting from: human error during transfer, rupture of barrels from deterioration or damage, seepage from fittings or valves, or equipment failure. Daily checking of equipment and preventative maintenance would also identify damage to the fuel system and reduce the risk of spills or leaks.
- 2.5 In the event of a spill, protection of human health and safety is paramount. Contamination of personnel involved in clean up is a real possibility as is contamination of the surrounding workplace and environment.

The individual responding to a spill shall:

- 1. Ensure personnel are appropriately trained.
 - a. All employees working on the CAM-D DEW Line Site Cleanup project, including contractors and sub-contractors, will be trained in the safe operation of all machinery and tools, as well as in the handling of materials to help prevent and respond to hazardous material spills in a timely and effective manner. All employees on site will also be trained for initial spill response in the event of a spill. The recommended training for these purposes consists initially of the 40-Hour Hazardous Waste Operations and Emergency Response (HAZWOPER) course offered by various environmental firms and the 8-Hour HAZWOPER refresher course every two (2) years thereafter.
- 2. Make use of materials and equipment available for adequate response to fuel spills, such as excavators for creating earthen dykes and hydrocarbon absorbent booms.
- 3. Warn people in the immediate vicinity and evacuate the area if necessary.
- 4. Wear protective clothing as required for handling spills.
- 5. Isolate and eliminate all ignition sources.
- 6. Identify the spilled material if possible, and take all safety precautions before approaching it.
- 7. Attempt to immediately stop the leakage and contain the spill, if safe to do so, by implementing the Spill Response Actions summarized in Section 2.5.1 below.
- 8. Report to the Field Team Leader the spill location, type of material, volume and extent, status of spill (direction of movement), and prevailing meteorological conditions.
- 9. Follow all applicable federal/territorial regulations and guidelines or the disposal of spill materials.
- 10. Document all events and actions taken. Include information required by applicable regulations and guidelines.
- 11. Notify appropriate government agencies using the contact list. Report spills immediately on the 24-Hour Spill Report Line (867) 920-8130.

2.5.1 Petroleum Hydrocarbon - SPILL RESPONSE ACTIONS

ON LAND

- Do not flush into ditches or drainage systems.
- Block entry into waterways and contain with earth, snow or other barrier.
- Remove small spills with sorbent pads.
 - On tundra use peat moss and leave in place to degrade, if practical.

ON SNOW & ICE

- Block entry into waterways and contain with snow or other barrier.
 - Remove minor spills with sorbent pads and/or snow.
 - Use ice augers and pump to recover diesel under ice.
 - Slots in ice can be cut over slow moving water to contain oil.
 - Burn accumulated diesel from the surface using Tiger Torches if feasible and safe to do so.

ON MUSKEG

- Do not deploy personnel and equipment on marsh or vegetation.
 - Remove pooled diesel with pumps and skimmers.
- Flush with low pressure water to herd diesel to collection point.
- Burn only in localized areas, e.g., trenches, piles or windrows.
 - Do not burn if root systems can be damaged (low water table).
- Minimize damage caused by equipment and excavation.

ON WATER

- Contain spill as close to release point as possible.
 - Use spill containment boom to concentrate slicks for recovery.
- On small spills, use sorbent pads to pick up contained oil.
- On larger spills, use skimmer on contained slicks.
- Do not deploy personnel and equipment onto mudflats or into wetlands

RIVERS & STREAMS

- Prevent entry into water, if possible, by building berm or trench.
 - Intercept moving slicks in quiet areas using (sorbent) booms.
- Do not use sorbent booms/pads in fast currents and turbulent water.

3 Wildlife Encounter

3.1 Bears are a potential hazard to workers at all times and the situation can be exacerbated by the presence of any substance that a bear perceives to be food.

- 3.2 EMPLOY DEDICATED WILDLIFE MONITORS AT ALL TIMES DURING CLEAN UP OPERATIONS.
- 3.3 Be familiar with bear deterrent procedures. Be familiar with the GNWT "Safety in Bear Country" manual and make available a reference copy at the site.
- 3.4 Operators of vehicles and equipment shall make every effort to avoid encounters with large mammals. Congregations of animals near food or garbage are a potential problem, which can be overcome by proper disposal of food wastes. Concentrations of scavenging animals, such as wolves, foxes and bears, increase the risk of diseases, particularly rabies, and danger to personnel. The following precautions and actions are to be taken at each site:
 - 1. The killing of wildlife for any reason at variance with the Wildlife Act and regulations is an offence. Co-ordinate procedures for handling wildlife problems and incidents with the regional Nunavut wildlife office.
 - 2. Use vehicle, noisemakers and, if necessary, a firearm to frighten the bear away from the site.
 - 3. Shoot the bear only if the bear returns repeatedly, refuses to leave or directly threatens human safety. Killing is considered a last resort and, if at all possible, the appropriate wildlife officer should be contacted to alert them of the problem. If a bear is to be shot, assign the task only to a person familiar with and competent with the camp firearm. Wounded or otherwise aggravated bears can be extremely dangerous.
 - 4. Report the death of a bear to the Field Team Leader and the appropriate wildlife officer who will issue instructions as to the disposal of the carcass and the formal reporting procedures to be followed.
 - 5. Due to the possibility of rabies, shoot any animal that bites a human and retain the carcass intact pending instructions from the appropriate wildlife officer. If possible, notify the wildlife officer before any drastic action is taken. Seek medical advice from the appropriate medical facility for treatment of animal-inflicted wounds.

4 Heritage Resources

- 4.1 All site personnel are prohibited from knowingly disturbing any archaeological or other heritage site or collecting any artifacts. Removing artifacts is a criminal offence.
- 4.2 In the event of finding heritage resources:
 - 1. Do NOT remove any artifacts or other associated objects from the site unless their integrity is threatened in any way.
 - 2. Mark the site's visible boundaries and avoid the area.
 - 3. Report the discovery of the site to the appropriate regulatory agency.
 - 4. Document the discovery.

- 4.3 In the event of a discovery of human remains:
 - 1. Advise the PMO of the discovery and they will contact the nearest detachment of the RCMP. The RCMP will make the decision as to whether the territorial coroner or archaeological department should be contacted.
 - 2. Halt all activities around the area of discovery. Until determined otherwise, the remains should be treated as evidence in a criminal investigation. If the remains are found in the bucket of heavy equipment, the bucket should not be emptied, as physical evidence may be destroyed.
 - 3. Secure the area and designate it as out of bounds to all personnel. Depending on weather conditions, the human remains should be provided with non-intrusive protection such as a cloth or canvas tarp (non-plastic preferred).
 - 4. Document the discovery.

5 Key Contact List

- 5.1 24-Hour Spill Report Line
 - 1. In the event of a spill, contact the 24-Hour Spill Report Line and provide them with all the relevant details.
 - Telephone: (867) 920-8130 Fax: (867) 873-6924
 - 2. Environment Canada, as lead agency, shall then be contacted by officials to ensure the appropriate response. The lines are staffed 24 hours a day and can also be used to co-ordinate a response in the event of a non-spill emergency outside of normal working hours.

5.2 Other Contacts

1. In the event of a non-spill emergency (e.g. related to wildlife, fisheries, heritage resource, etc.), contacts are provided in Table 1.

Table 1: Contact List

Resource	Location	Phone Number			
24 Hour Spill Line	NWT/Nunavut	867-920-8130			
Local Fire	Gerald Pickett, Chief Fire Marshal	867-975-5310			
Department	Office of the Fire Marshal				
	Nunavut Emergency Services Division				
	Department of Community Government and				
	Transportation				
Environment	Iqaluit, Nunavut	867-975-4644			
Canada,	Environment/Emergencies Enforcement				
Enforcement Branch	Officer				
	Iqaluit, NT				
Indian and Northern	Iqaluit Office	867-975-4500			
Affairs Canada	Peter Kusugak	867-975-4295			
	Iqaluit Region District Operations Manager				
Renewable	Gladis Lemus, Ph.D.	867-975-5907			
Resources Officer	Manager Pollution Control & Air Quality				
Stations – Baffin	Department of Environmental				
Region	c/o Environmental Protection				
	Government of Nunavut				
	Iqaluit, Nunavut				
Indian and Northern	Iqaluit Office	867-975-4500			
Affairs Canada –	Bob Martin	867-979-7931			
Project Proponent	DOU MATUII	007-979-7931			
Public Works and	Site Supervisor – tbd				
Government Services	Program Manager – Jared Buchko	780-497-3886			
Canada –					
Project Management					



NWT SPILL REPORT

(Oil, Gas, Hazardous Chemicals or other Materials)

24 – Hour Report Line Phone: (867) 920-8130 Fax: (867) 873-6924

A	Report Date and Time	B Date and Time of	f spill (if known)		C	Origii Upda	nal Report ate no	Spill Numbe	r			
D	Location and map coordinates (if known) and	direction (if moving)			•							
Ε	Partly responsible for spill											
F	Product(s) spilled and estimated quantities (provide metric volumes/weights if possible)											
G	Cause of spill											
Η	s spill terminated? J If spill is continuing, give estimated rate yes no I If spill is continuing, give estimated rate yes no						contaminated area (in square meters if possible)					
L	Factors effecting spill or recovery (weather conditions, terrain, snow cover, etc.) M Containment (natural of the conditions)						depression, dikes, etc.)					
N	Action, if any, taken or proposed to contain, re											
O	Do you require assistance? no yes, describe:	P	ossible hazards to person, p	property, or	r enviror	nment; eg:	fire, drink water, fish	or wildlife				
Q	Comments or recommendations						FOR SPILL	LINE USE	ONLY			
							Lead agency					
							Spill significance					
							Lead Agency con	tact and time				
							Is this file now clo] yes] no			
Repo	orted by	Position. Employer, Loc	ation				Telephone					
Repo	orted to P	Position. Employer, Loc	ation				Telephone					