

Nunavut Regional Office P.O. Box 2200 Iqaluit, NU, X0A 0H0

February 09, 2009

Attn: Mr. Thomas Kabloona, A/Chief Executive Officer Nunavut Water Board P.O. Box 119 Gjoa Haven, Nunavut X0B 1J0

RE: Nunavut Water Board (NWB) Licence No. 1BR-ROB0813 (NWB's Required Submissions)

As per the table of required submissions on page iii of the Roberts Bay/ Ida Bay's NWB Licence # 1BR-ROB0813, please find the following documents enclosed:

- 1. NWB's Table of Required Submissions (with INAC's responses);
- 2. Modifications to final Remedial Action Plan (RAP) highlighting some modifications made to the project since the submission of the final RAP to NWB. The modifications were effected in the Project Specifications;
- 3. Roberts and Ida Bay Project Specifications;
- 4. General Monitoring Plan (as per Part K of the Water Licence # 1BR-ROB0813);
- 5. Long Term Monitoring plan;
- 6. Abandonment and Restoration Plan;
- 7. Operations and Maintenance Plan for Sewage Disposal Facility;
- 8. Site Specific Health and Safety Plan; and
- 9. Tailings Freezeback Report.

Should you have any questions or require any clarifications, please contact the undersigned or the Project Manager, Dele Morakinyo at dele.morakinyo@inac-ainc.gc.ca, or by telephone at (819) 934-9224

Sincerely,

Natalie Plato, P. Eng.

Director, Contaminated Sites Program (NRO)

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21.0 SPILL CONTINGENCY PLAN:

This spill contingency plan has been developed in accordance with the Spill Contingency Planning and Reporting Regulations, NWT Reg. 068-93 and the Environmental Protection Act (EPA) to ensure:

- Life is protected
- Injuries are avoided or minimized
- Resources are used effectively
- Environmental impact is minimized
- Essential reporting is completed

The Spill Contingency Plan will be incorporated into the Worker Orientation Seminars prior to the project.

Spill hazards will be identified and spill response procedures will be reinforced at the daily tailgate meetings.

Emergency spill response kits will be maintained at all fuel storage sites and stationed at all work areas and refuelling areas.

If a fuel, oil or other harmful substance spill occurs during the project, the following procedures will be implemented:

- Ensure safety
- Stop the flow
- Secure the area
- Contain the spill
- Clean-up
- Notify / Report

21.1 Ensure Safety:

- Act quickly to protect site personnel, the public and the environment
- Never rush in, always determine the product spilled and take appropriate action
- Wear appropriate personal protective equipment (PPE)
- Warn people in the immediate vicinity
- Ensure no ignition sources are present in the immediate area if the spill is a flammable material

21.2 STOP THE FLOW:

- Act quickly to reduce safety hazards and environmental impact
- Close valves, shut off pumps or plug holes/leaks
- Stop the flow or the spill at its source

21.3 SECURE THE AREA:

- Isolate the contaminated area with appropriate barriers and signage
- Limit access to the spill area
- Prevent unauthorized entry onto the spill site

21.4 CONTAIN THE SPILL:

- Block off and protect drains, culverts and water bodies
- Prevent spilled material from entering drainage structures (ditches, culverts, drains) or local water bodies
- Use spill absorbent material to contain and absorb the spill
- If necessary, use a dyke or any other method to prevent any discharge from spill site.
- Make every effort to minimize contamination

21.5 CLEANUP:

- Consolidate and package all liquid waste for proper disposal
- Excavate/collect and package all contaminated organic materials for proper disposal
- Recover and package all contaminated absorbents, spill containment materials and disposable protective equipment for proper disposal
- Decontaminate all equipment; package all equipment decontamination waste (soil, wash water etc.) produced for proper disposal
- Clean all tools; package all used cleaning materials for proper disposal
- Decontaminate (clean/wash) all reusable clothing, boots etc.; package all decontamination waste produced for proper disposal

21.6 NOTIFY / REPORT:

- Notify NT NU 24 Hour Spill Report Line (867) 920-8130
- Notify project management
- Complete and submit NWT Spill Report form
- Complete and submit QMLP Incident Investigation form

The Spill Contingency Planning and Reporting Regulations for NWT Reg 068-93, Schedule B specifies minimum reportable quantities listed by type of contaminant and described as per the Transport of Dangerous Goods Act (TDG).

Minimum Reportable Quantities for NWT:

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ITEM NO.	TDG CLASS	DESCRIPTION OF CONTAMINANT	AMOUNT SPILLED
1.	1	Explosives	Any amount
2.	2.1	Compressed gas (flammable)	Any amount of gas from containers with a capacity greater than 100 L
3.	2.2	Compressed gas (non-corrosive, nonflammable)	Any amount of gas from containers with a capacity greater than 100 L
4.	2.3	Compressed gas (toxic)	Any amount
5.	2.4	Compressed gas (corrosive)	Any amount
6.	3.1, 3.2, 3.3	Flammable liquid	100 L
7.	4.1	Flammable solid	25 kg
8.	4.2	Spontaneously combustible solids	25 kg
9.	4.3	Water reactant solids	25 kg
10.	5.1	Oxidizing substances	50 L or 50 kg
11.	5.2	Organic Peroxides	1 L or 1 kg
12.	6.1	Poisonous substances	5 L or 5 kg

21.7 EMERGENCY SPILL RESPONSE KITS

Emergency spill response kits will only be used in emergency situations. The onsite Emergency Response Coordinator will inspect spill kits, regularly and after each use, and replace all used items.

21.7.1 Fuel Storage Site Emergency Spill Response Kit Contents:

Quantity	Description
200	Polypropylene Absorbent Pads 18"X18"X3/8"
16	Polypropylene Absorbent Booms 5" diam x 3 m
16	Polypropylene Absorbent Socks 3" diam x 3 m
24 kg	Cellulose or Diamataceous Earth Particulate (Floor Dry)
4	205 litre Tight Head Drums
6	205 litre Open Top Drums with seals and locking lids
6	6 mil poly x 205 litre Drum Liners
300 m	Barrier Tape, Yellow "Caution Do Not Enter"
1 box	Nitrile Gloves, Extra Large
6 pair	Polypropylene Gloves, Large
50 m	1/4" Polypropylene Rope, Yellow
30	Empty Sand Bags 14" X 22"
1 roll	6 mil x 30m x 12m Poly Sheet
1 roll	Duct Tape
1 box	Paper Hand Towels
2	85 gal Poly Overpack Drum (Yellow) with lids, labelled "Spill Kit"

21.7.2 Work Area and Refuelling Area Emergency Spill Response Kit Contents:

Quantity	Description	
200	Polypropylene Absorbent Pads 18"X18"X3/8"	
8	Polypropylene Absorbent Socks 3" diam x 3 m	
6	6 mil poly x 205 litre Drum Liners	
1 box	Nitrile Gloves, Extra Large	
2 pair	Polypropylene Gloves, Large	
1 box	Paper Hand Towels	
1	85 gal Poly Overpack Drum (Yellow) with lids, labelled "Spill Kit"	