



Water Resources Division
Nunavut Regional Office
Iqaluit, NU
X0A 0H0

NWB File: 1BH-RFS0910
CIDMS #: 387062

Feb 1, 2010

Richard Dwyer
License Administrator
P.O. Box 119
Gjoa Haven, NU
X0A 0H0

**Re: 1BH-RFS0910 - Rankin Inlet Revised Fuel Storage Facility Spill Plan -
Hamlet of Rankin Inlet**

Please be advised that Indian and Northern Affairs Canada (INAC) have completed a review of the revised fuel storage facility spill plan at Rankin Inlet 1BH-RFS0910 – Hamlet of Rankin Inlet. The NWB circulated the revised fuel storage facility spill plan on January 12, 2010. All documents related to the revised spill plan posted on the NWB ftp site under 1BH-RFS were included in my review.

Should you have any questions or comments, please do not hesitate to contact me at (867) 979-4282 or by email at Ian.Parsons@inac.gc.ca.

Sincerely,

Original signed by

Ian Parsons
Water Resources Technician

Cc. Lou-Ann Cornacchio, Manager of Water Resources – Indian and Northern
Affairs Canada, Nunavut Regional Office



Technical Review Memorandum

To: Richard Dwyer – License Administrator, NWB
Marc Losier – Project Manager, Mosher Engineering Limited

From: Ian Parsons – Water Resources Technician, Indian & Northern Affairs Canada.

Re: 1BH-RFS0910 – Revised Fuel Storage Facility Spill Plan - Hamlet of Rankin Inlet

Background

The Rankin Inlet Fuel Storage Upgrade and Expansion Project will be completed over a two year period and will consist of building new tanks and the relocating/refurbishing of older tanks. Mosher Engineering Limited (Proponent) will carry out all infrastructure activities and as the proponent are required to submit a Spill Contingency Plan as a stand alone document as per Part H Item 1 of water License 1BR-RFS0910

INAC's mandate, with respect to water resources, is to protect fresh water sources in Nunavut. The water that is being used for the project will be sea water (saltwater) and outside of INAC's mandate/jurisdiction. However, noted below are comments and recommendations for the board to consider regarding the spill contingency plan for the fuel storage facility associated with this project.

Recommendations/Comments

- 1) There is a difference between the size/number of storage tanks referred to in the spill contingency plan and the water license application. The discrepancies noted below should be resolved.

Spill Contingency Plan refers to:

- i) three 3,064,000 litre Jet A1 storage tanks.
- ii) two 2,565,000 litre LSDL storage tanks
- iii) one 1,986,000 litre LSDL storage tank.

The water licence application refers to:

- i) two 3,064,000 litre Jet A1 storage tanks.
- ii) Same as above.



- iii) Same as above.
- iv) relocation of three 1,351,000 litre vertical tanks.

Further the "Tank Hydrostatic Testing Procedure" section refers to:

- i) one new 3200 m³ vertical tank
- ii) relocate/refurbish two 947 m³ vertical tanks
- iii) relocate two 92 m³ horizontal tanks

- 2) The Spill Contingency Plan Reporting Section of the Spill Contingency Plan should make reference to the Nunavut Spill Report Line and include a copy of the Nunavut Spill Report Form. Please note that the 24-hour Spill Report Line telephone number is (867) 920-8130 and facsimile number is (867) 873-6924. Furthermore, INAC requests the proponent report all spills to Peter Kusugak, INAC Manager of Field Operations, phone: 867-975-4295, fax 867 975-6445 as well as the Nunavut Spill Report Line.
- 3) Spill Contingency Plan should conform to the procedures for the treatment and release of water used during the hydrostatic testing referred to in items 5 and 6 of Part D of the licence.
- 4) Detailed lead abatement procedures should be received by NWB as part of the spill contingency plan before any spill plan is approved, not prior to the start of painting operations.
- 5) The proponent should confirm that the landfarm that is proposed for managing the contaminated soil is properly engineered for both intended uses (ie. Spill contingency requirements as well as treating contaminated soil from existing tank farm)
- 6) An inventory/list of all quantities of materials contained in spill kits should be outlined in the Spill Contingency Plan as per Part H Item 1 of the water license.
- 7) The Spill Contingency Plan should include how hazardous material (wastes/sludge) is collected, stored and removed from the site. Hazardous wastes in Nunavut must be disposed of at an approved waste disposal site and require the acquisition of a waste manifest from the Government of Nunavut, Environmental Protection Division as per Part H Item 1 of the water license.
- 8) A detailed description of the tank farm site is required including location, size and storage capacity of site as per Part H Item 1 of the water license.
- 9) The training plan is also required as per Part H Item 1 of the water license.



Mosher Engineering Limited should provide the Nunavut Water Board all outstanding information above before the Spill Contingency Plan is approved for water license # 1BH-RFS0910.

Cc. Lou-Ann Cornacchio, Manager of Water Resources – Indian and Northern Affairs Canada, Nunavut Regional Office
Peter Kusugak, District Manager – Indian and Northern Affairs Canada, Nunavut Regional Office