



Indian and Northern
Affairs Canada

Affaires indiennes
et du Nord Canada

December 16, 2010

Our reference
File #9545-2-1.3BC.ERIA
CIDM #438425

Sent by email: licensingadmin@nunavutwaterboard.org

Your reference
3BC-ERI1011/TR/H1

Richard Dwyer
Licensing Administrator
Nunavut Water Board
Gjoa Haven, Nunavut
X0E 1J0

**Re: Nunavut Water Board Licence #3BC-ERI1011, Geological Survey of
Canada, Ellef Ringnes Island Project, Qikiqtani Region, Revised Spill
Contingency Plan**

Dear Richard,

Thank you for your November 30, 2010 request for written representations on the
above referenced submission.

A Technical Review Memorandum is provided for the Board's consideration.

Please do not hesitate to contact me by telephone at 867 975-4555 or email at
david.abernethy@inac-ainc.gc.ca to discuss this submission.

Regards,

David W. Abernethy
Water Resources Regional Coordinator
Operations Directorate
Nunavut Regional Office
Iqaluit, Nunavut
X0A 0H0

Encl.

c.c.: L.A. Cornacchio, Water Resources Manager
P. Kusugak, Field Operations Manager

Technical Review Memorandum

TO Richard Dwyer
Licensing Administrator
Nunavut Water Board

OUR REFERENCE
File #9545-2-1.3BC.ERIA
CIDM #438425

FROM David Abernethy
Water Resources Regional Coordinator
Indian and Northern Affairs Canada

YOUR REFERENCE
3BC-ERI1011/TR/H1

DATE
Dec. 16/10

SUBJECT **Nunavut Water Board Licence #3BC-ERI1011, Geological Survey of Canada, Ellef Ringnes Island Project, Qikiqtani Region, Revised Spill Contingency Plan**

A. PROJECT DESCRIPTION

On Nov. 30/10 the Nunavut Water Board (NWB or Board) provided notification that a revised Spill Contingency Plan was submitted by the Geological Survey pursuant to Part H, Item 1 of Water Licence 3BC-ERI1011. Interested parties were requested to review this submission and provide written representations by Dec. 30/10.

B. RESULTS OF REVIEW

On behalf of the Indian and Northern Affairs Canada Water Resources Division I am providing the following comments/ recommendations for the Board's consideration,

1. Management of Petroleum Hydrocarbon Contaminated Soils

The submitted Spill Contingency Plan does not address how recovered petroleum hydrocarbon contaminated soils will be managed. The Geological Survey of Canada should establish standard operating procedures for managing such materials. It is recommended that recovered petroleum hydrocarbon contaminated soils be delivered to an approved treatment facility.

2. Effluent Discharge from Secondary Containment Berm

There should be no visible sheen of oil and grease in effluent released from the fuel cache's secondary containment berm. If a filtration unit is used during decant its design details should be provided to the NWB.

3. Spill Response Scenarios

The submitted plan does not include contingency measures to address spill response scenarios in different conditions that are applicable to the project area (i.e., spills on land, water, and ice) as required by the water licence. It is recommended that this information be included in a revision to the submitted plan.

4. Burning of Recovered Fuel Products

Section vii of the submitted plan states that fuel recovered from spills may be collected in empty drums and subsequently used in burn pits. It is recommended that recovered fuel be containerized and delivered to an appropriate treatment facility. Any burning of non-hazardous combustible wastes should be consistent with practices accepted by the Board and Environment Canada's "Technical Document for Batch Waste Incineration."

Prepared by David Abernethy

c.c.: L.A. Cornacchio, Water Resources Manager
P. Kusugak, Field Operations Manager