NWB Tools

Phyllis Beaulieu <phyllis.beaulieu@nwb-oen.ca>

RE: 140410 1WLC-NNF---- , Acknowledge New Application for Approval Without a Licence-OMLE

1 message

Van Dyck, Tamara <Tamara.VanDyck@dcc-cdc.gc.ca> Tue, Apr 15, 2014 at 10:49 AM
To: Phyllis Beaulieu <phyllis.beaulieu@nwb-oen.ca>, Sean Joseph <sean.joseph@nwb-oen.ca>
Cc: Robin Ikkutisluk <robin.ikkutisluk@nwb-oen.ca>, Rodney Watson <rodney.watson@forces.gc.ca>, "dave.hohnstein@nwb-oen.ca" <dave.hohnstein@nwb-oen.ca>, "Damien.cote@nwb-oen.ca" <Damien.cote@nwb-oen.ca>, "Lemay, Louis" <Louis.Lemay@dcc-cdc.gc.ca>

Hi Phyllis and Sean,

I could tell by the questions that Sean had emailed to me that there was a bit of confusion regarding our application; so I had arranged a teleconference to try to provide clarity to the NWB. Unfortunately only David Hohnstein and Damien Cote were available. During the teleconference the NNF Project was able to explain that the application that was sent to the NWB was only for the construction camp that will be present on site to build the Facility it was not an application for the Facility during operation.

1. Details pertaining to the proposed fuel storage facility, including capacity, containment areas, and preliminary or for-construction design drawings.

Once the NNF has been commissioned a contract will be in place for the operation of the Facility, it will then be the Facilities Operator's responsibility to obtain permits for the operations on the site. Once built: naval distillate will be stored in two 22-m diameter aboveground single-walled vertical tanks (each tank will have a 3,750,000 L capacity), diesel will be stored in two pre-fabricated 3 m diameter aboveground double-walled, horizontal tanks (each tank will have a 81,000 L capacity), and 15 drums of Aviation fuel.

Fuel Storage Capacity at the Nanisivik Naval Facility

Location	Fuel	Volume (L)	Storage
Bulk Liquids Storage Facility	Naval distillate	7.5 million	Two 22-m diameter single-walled vertical tanks
	Diesel	100,000	Two 3-m diameter double-walled horizontal tanks
	Aviation fuel	3,000	15 drums

Each naval distillate at the Bulk Liquids Storage Facility will have a separate secondary containment cell. Containment cells will consist of compacted gravel containment berms lined with an arctic-rated geomembrane liner covered with a 0.15 m layer of compacted gravel. One common containment cell will contain both diesel storage tanks. The diesel storage tank cell will be a 0.7 m high engineered steel containment dike system. The containment cells are sized to 110% of the capacity of the respective tank. Leak detection systems and rainwater and melt water collection systems will be installed. The pumps (30 hp for naval distillate and 7.5 hp for diesel) will be mounted on an outdoor structural steel platform and enclosed by a 0.25-m high containment berm lined with an arctic-rated geomembrane liner covered with a 0.15-m layer of compacted gravel. Pipelines will be aboveground, supported by concrete foundations on grade and grounded.

Mobile equipment diesel refuelling stations and all areas for storage of hydrocarbons will be equipped with a containment area and liner.

Forty drums of petroleum, oils and lubricants and fifteen drums (3,000 L) of aviation fuel will be stored in the POL storage area within the Bulk Liquids Storage Facility. A portable pump will be used for fuel transfer. The POL storage area will be secure, lined and bermed.

The Bulk Liquids Storage Facility will be a secure, fenced area of approximately 800 m2.

This bulk fuel storage information is for the operation of the facility only and does not include fuel storage requirement for construction. The construction contract of this facility has not been awarded yet and the size of fuel tanks that the contractor will be bringing to site is not yet known. The contract specifications provide clear direction that contractor fuel storage must be in compliance with all regulations.

2. Copy of the site-specific Spill Contingency Plan (SCP) developed for the facility.

As explained during the teleconference, once built a Site-Specific Spill Contingency Plan is to be developed by the construction contractor and a copy will be provided to the NWB. I have included a copy of the Emergency and Spill Response Plan template that the construction contractor will be required to develop once this contract is awarded. I have also included a copy of the NNF Spill Contingency Plan provided to the NIRB in the NNF Part 2 submission.

The NNF Project has applied for approval for **construction only,** this is because the construction contract is going to be awarded so close to the summer field season, in order to avoid delays, the NNF Project has applied for the approval. Upon award the construction contractor will be applying for all permits and will be required to provide:

The points below have been extracted from the contract tender documents

a.) A detailed fuel management plan, including supply methods, storage location and facilities, dispensing methods, spill monitoring and spill responses.

b.) Post fuelling procedures and spill response procedures, and have on-hand fully stocked spill kit.

c.) Store fuel in accordance with applicable regulatory requirements, and no closer than 31 m from the nearest water course.

d.) Fuelling will occur only once a portable spill containment berm is in place under the nozzle to vehicle connection.

3. Copy of the Abandonment and Restoration Plan (A&RP) developed for the facility

As mentioned during the teleconference, the NNF Construction Project has determined that the life of this infrastructure is projected to be till 2067 however, this is only based on the anticipated lifespan of the infrastructure. The Government of Canada has no plans at this time to Abandon this site, none the less a very preliminary plan can be developed if required at this time. Please clarify if this request is also pertaining to the construction camp which is what the application for approval is requesting.

All three of the items that the NWB is requesting appear to be pertaining to the Facility. However, the intent of this application is for the establishment of a construction camp, as discussed during the teleconference. We believe that none of the items listed as required documents are identified in the *Guide to the Approval for the Use of Water or Deposit of Waste Without a Licence.* We believe David Hohnstein was to follow up with AANDC to provide the NNF Project with a better understanding of what further information is required.

Regards,

Tamara

Tamara Van Dyck B.Sc.

Coordinator, Environmental Services / Coordinateur, services environnementaux

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From: Phyllis Beaulieu [mailto:phyllis.beaulieu@nwb-oen.ca]
Sent: April 10, 2014 3:36 PM
To: Van Dyck, Tamara; Rodney Watson
Cc: Sean Joseph; Robin Ikkutisluk
Subject: 140410 1WLC-NNF---- , Acknowledge New Application for Approval Without a Licence-OMLE

Good afternoon Tamara:

The Nunavut Water Board acknowledges receipt on March 18, 2014 of your request for Approval Without a Licence for the Nanisivik Naval Facility. At this time the Technical Advisor, Sean Joseph, requires additional information in order to assess whether or not the activity qualifies for this type of approval (request sent from Sean on April 1, 2014). Once our office receives the required information you will be notified of the outcome

Regards

Phyllis Beaulieu- ᐅᐱᓪᓗ ᐊᓪᑎ

Manager of Licensing- Responsable des Permis

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2 attachments

NNF Contract Specification for Emergency and Spill Response Plans.pdf
608K

NNF Spill Contingency Plan (NIRB 2013).pdf
1274K