



October 18, 2010

Our reference
File #9545-2-3.1BR.LTUA
CIDM #431335

Sent by email: licensing@nunavutwaterboard.org

Your reference
1BR-LTU1013/TR/H1

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board
Gjoa Haven, Nunavut
X0E 1J0

**Re: Nunavut Water Board Licence #1BR-LTU1013/TR/H1, Transport
Canada, Iqaluit Airport Project, Qikiqtani Region, Spill Contingency
Plan Addendum**

Dear Phyllis,

Thank you for your September 17, 2010 notice of Transport Canada's July 12, 2010 Spill Contingency Plan submission as required by their water licence. Interested parties were requested to review this submission and provide written representations by October 18, 2010.

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 Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board

OUR REFERENCE
File #9545-2-3.1BR-LTUA
CIDM #431335

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

YOUR REFERENCE
1BR-LTU1013/TR/H1

DATE
October 18, 2010

SUBJECT Nunavut Water Board Licence #1BR-LTU1013/TR/H1, Transport Canada,
Iqaluit Airport Project, Qikiqtani Region, Spill Contingency Plan Addendum

A. PROJECT DESCRIPTION

On Sept. 17/10 the Nunavut Water Board (NWB or Board) provided notice of Transport Canada's July 12/10 Spill Contingency Plan submission pursuant to Part H: Conditions Applying to Spill Contingency Planning, Item #1 of their Iqaluit Airport Project's water licence, #1BR-LTU1013. Interested parties were requested to review this submission and provide written representations by October 18, 2010.

Part H, Item #1 of the licence states,

The Board acknowledges receipt of the Plan entitled "NWB Water License Number: 1BR-LTU0608, Part H: Spill Contingency Plan" undated and received on June 26, 2009. The Plan, although containing basic information, is lacking specific components of a plan acceptable to the Board. The Licensee shall therefore submit to the Board for approval, within sixty (60) days of issuance of the Licence, a revised Spill Contingency Plan, developed in the format set out by the Consolidation of Spill Contingency Planning and Reporting Regulations R-068-93, and address comments received during the application review process. In addition to addressing products to be stored, the procedures for the prevention, monitoring, detection, containment and cleanup of potential failures from the Land Treatment Unit containment structures shall also be included.

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. General Observations

- The document made available for review titled, “Spill Contingency Plan Addendum,” appears to be the same as the June 26/09 Spill Contingency Plan that was submitted as supporting documentation to the 2008 licence renewal application. The difference between these two submissions is that the July 12/10 document is in Microsoft Word format whereas the June 26/09 document is in Adobe Acrobat format. Therefore, Part H, Item #1 of the licence has not been addressed through this submission. Transport Canada should review their project’s Spill Contingency Plan and make the necessary revisions as specified in their licence. INAC’s April 2007 Guidelines for Spill Contingency Planning can reviewed when preparing this document (attached).
- Procedures for the prevention, monitoring, detection, containment, and clean-up of potential failures from the land treatment unit containment structures should be addressed through the project’s Operations and Maintenance Manual.

2. Spill Response Equipment

The submitted plan states that operators are required to have a spill kit -with them at all times while on site and that any spills greater than the kit capacity’s will be reported to the Spill Report Hotline at 867 920-8130. Greater detail for the spill response equipment should be included in a revised plan. The contents of each spill kit, the number of spill kits, the response capacities of each spill kit, and the equipment that will be used for responding to spills that cannot be mitigated with these spill kits.

3. Site Map

The submitted plan should be revised to include a reference map set to an appropriate scale that identifies as a minimum, the project area, site infrastructure, nearby water bodies, and contour levels. The Google Earth map included in the current plan does not provide sufficient detail to understand the possible impact of a spill from the project area to its surrounding watershed.

4. Emergency Contacts

INAC’s Manager of Field Operations should be notified of any spills that are reported pursuant to Schedule B of the Spill Contingency Planning and Reporting Regulations. The Manager of Field Operation can be contacted by telephone at 867 975-4295 or fax at 867 979-6445.

5. Spill Report Form

The spill contingency plan should be revised to include a copy of the Government of Nunavut Spill Report available from the Nunavut Water Board’s public registry.

Prepared by David Abernethy