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Your file - Votre référence
NWB1BOS0106 & NWB1HOP0207
Our file - Notre référence
9545-1-1-BOS-G

August 18, 2004

Phyllis Beaulieu
Licencing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0

Via e-mail

Dear Ms. Beaulieu

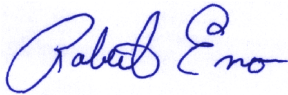
Re: Miramar Hope Bay Updated Spill Contingency Plan

INAC Water Resources reviewed the above mentioned spill contingency plan and has the following comments to offer.

1. The plan describes the inventory of hazardous materials on site, however, when the proponent next updates the plan, it would be helpful to the reviewer if they provide a separate section which lists, in a tabular format, all of the hazardous materials (such as diesel, Jet B, gasoline etc), quantities of each, type of containers and their locations.
2. The proponent has indicated that regular inspections of their storage facilities will be undertaken. The reviewer suggests that the proponent pay particular attention to flex connectors; if these are being used. Over the past several years, there have been a number of major spills which have occurred as a result of poorly-installed flex connectors. The reviewer can provide more information upon request.
3. The reviewer suggests that a few more shovels and some pick axes be added to the spill kits.
4. The proponent provided a list of additional emergency contacts that they will presumably call upon for assistance in responding to a spill should the need arise. The proponent should provide a resume/summary of the respective qualifications and experience of these firms.
5. The oblique air photo maps of the sites is a novel idea, however, it would be helpful if these were of a higher resolution and a larger scale in order that the proponent can provide further details on topography and probable pathways of contaminant flow – such as culverts, valleys and ditches – in the event of a spill. This can be addressed when they next update their spill plan.

6. The proponent should update their list of government contacts; particularly for the Government of Nunavut. The Department of Resources, Wildlife and Economic Development ("RWED") no longer exists in Nunavut. The Department of Sustainable Development (DSD) has since been spit up and re-organized. The Department of the Environment, has now assumed the regulatory role formerly administered by DSD. Contact Earle Baddaloo, Director, Environmental Protection Service, Iqaluit at (867) 975-5910, for further details.
7. The reviewer commends the proponent for taking the initiative to purchase a used oil furnace for managing their waste oil.
8. Notwithstanding the above minor comments, the reviewer is satisfied with the proponent's spill plan and commends them for their efforts.

If the proponent requires further information and/or clarification on any of the above comments, they should feel free to contact the undersigned.



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