

July 30, 2004 <u>NWB File:</u> NWB2ANI0406

Mrs. Phyllis Beaulieu Manager of Licensing Nunavut Water Board P.O. Box 119 Gjoa Haven, NU X0E 1J0

<u>via Email to:</u> licensing@nwb.nunavut.ca

Dear Mrs. Beaulieu:

Re: STRONGBOW EXPLORATION INC. – 2004 SPILL RESPONSE PLAN ANIALIK RIVER PROJECT

The Department of Environment (DOE), Government of Nunavut has reviewed the 2004 Spill Response Plan for the Anialik River Project, Strongbow Exploration Inc., Nunavut. This report was submitted to the NWB under Strongbow Exploration Inc. current water license, Part G, Item 1.

The GN-DOE recommends that the proponent checks the requirements of the "Nunavut Spill Contingency Planning and Reporting Regulations", and "A Guide to the Regulations – Spill Contingency Planning in Nunavut" which are available upon request. Overall, the spill response plan covers the main sections that are required; however some sections are lacking information that would complete the plan, details are as follows:

- 1) The proponent should provide a site map showing the location of buildings, spill response equipment, spill clean-up materials, and location of project (UTM Co-ordinates).
- 2) The proponent should provide MSDS sheets for all petroleum and chemical products stored on site.
- 3) The proponent must provide more information on the training and orientation that the employees will receive prior to or on arrival to the site.
- 4) The proponent states that any spilled petroleum products in sand or gravel will be excavated and incinerated and returned to their natural site. The proponent does not provide the type of incinerator that will be used to ensure that all of the hydrocarbons will be removed. A copy of the incinerator design and the operating temperature at which the incinerator will burn should be provided. If incinerator is the selected disposal option, then it is recommended that the proponent also check the Canadian Council Ministers of Environment (CCME) Guidelines on this matter.

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Department of Environment

Ministère de l'Envrionnement

We thank the NWB for giving us the opportunity to review this spill response plan. Please contact me if you have any further questions or comments.

Sincerely,

Original signed by

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