



Environment Environnement
Canada Canada

Environmental Protection Branch
Qimugjuk Building 969 P.O. Box 1870
Iqaluit, NU X0A 0H0
Tel: (867) 975-4639
Fax: (867) 975-4645

May 25, 2005

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board
P.O Box 119
Gjoa Haven, NU X0E 1J0
Tel: (867) 360-6338
Fax: (867) 360-6360

Our file: 4703 001 016

Via email at licensing@nwb.nunavut.ca

RE: NWB1BOS, NWB1GOO, NWB1HOP – Submission of Design of Secondary Containment for Aboveground Storage Tanks – Boston Camp, Windy Lake Camp, and Goose Camp

On behalf of Environment Canada (EC), I have reviewed the information submitted with the above-mentioned application. The following specialist advice has been provided pursuant to Environment Canada's mandated responsibilities for the enforcement of the *Canadian Environmental Protection Act*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

Miramar Hope Bay Ltd. has submitted information regarding their proposed plan to construct secondary containment for aboveground storage tanks at the Boston Camp, the Windy Lake Camp, and the Patch Lake Camp.

Environment Canada recommends that the following conditions be applied throughout all stages of the project:

- The information submitted by Biogenie states that "no guidelines currently exist for storage requirements in Nunavut". However, the CCME Guidance Document PN 1326 entitled "Environmental Code of Practice for Above Ground and Underground Storage Tank Systems containing Petroleum Product and Allied Petroleum Products" is applicable in Nunavut. Environment Canada is proposing to repeal the existing "Registration of Storage Tank Systems for Petroleum Products and Allied Petroleum Products on Federal Lands and Aboriginal Lands Regulations" and replace it with a regulation that has a broader scope of application. The new regulation under the *Canadian Environmental Protection Act* (CEPA) 1999, Part 9 will incorporate mandatory technical requirements (secondary containment, leak detection, corrosion protection, overfill, spill containment) and be more in line with those regulations that already exist in most provincial and territorial jurisdictions. Compliance with the proposed regulations will be mandatory, and EC will conduct inspections to ensure compliance with the regulations. These new regulations are based on the 2003 CCME Guidance document referenced above. For more information concerning the proposed Federal Petroleum Product and Allied Petroleum Products Storage Tank Systems Regulation contact Jillian Brown, Environment Canada, at (306) 780-5399.
- The application notes that all of the proposed secondary containment systems are located outside the 30 m minimum distance from any waterbody. Environment Canada recommends that in addition to this minimum distance, the proponent ensure that the



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facilities are located in such a manner as to prevent the contents from entering any waterbody frequented by fish. For example, locating a facility on the top of a steep hill which is 30 vertical meters from a waterbody could still result in the contamination of the waterbody if a failure occurred.

If there are any changes in the proposed project, EC should be notified, as further review may be necessary. Please do not hesitate to contact me with any questions or comments with regards to the foregoing at (867) 975-4639 or by email at colette.spagnuolo@ec.gc.ca.

Yours truly,

Original signed by

Colette Spagnuolo
Environmental Assessment / Contaminated Sites Specialist

cc: (Stephen Harbicht, Head, Assessment and Monitoring, Environment Canada, Yellowknife)