

August 18, 2004

NWB File:
NWB1BOS0106
NWB2HOP0207

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

via Email to:
licensing@nwb.nunavut.ca

Dear Mrs. Beaulieu:

**Re: SPILL CONTINGENCY PLAN
BOSTON & WINDY LAKE PROJECTS**

The Department of Environment (DOE), Government of Nunavut has reviewed the Spill-Contingency Plans for the Boston & Windy Lake Projects, Miramar Hope Bay Ltd., Nunavut. These reports were submitted to the NWB under Miramar Hope Bay Ltd. current water licenses.

The comments from our review are as follows:

- The proponent must provide **accurate quantities of contaminants** including fuels and chemicals that are normally stored on site. Section 2(d) under the Spill Contingency Planning and Reporting Regulation requires “A description of the type and amount of contaminants normally store on site”. Volumes or weights would be the maximum amount of contaminant that may be on-site at anytime. This information is vital, ensuring safety of on-scene response personnel.
- It is recommended that the proponent **provide co-ordinates** of Boston and Windy Lake Projects in the spill contingency plan. This would provide exact locations if outside help is needed for spill response.
- The proponent should be using **secondary containment** for all fuel storage tanks. However, in Windy Lake camp the tanks are located in a natural berm; this will provide little protection in the event of a major spill.
- In the spill contingency plan the proponent plans to incinerate solid wastes and waste oils. What **type of incinerators** are they planning on using and what are the specifications of these incinerators? It is recommended that the proponent provide specifications of the incinerators that will be used on site.
- Please **update Section 15.8** ‘List of relevant Government department emergency contact information’, with the following:

- 3rd row, 1st column: 'Nunavut/Northwest Territory 24-hour Spill Report Line'
- Replace rows 12 to 16, with the following:

Department of Environment (GN-DOE) – Wildlife Officer	Shane Sather	Cambridge Bay	Tel: (867) 983-4165, Fax: (867) 983-4163
Department of Environment (GN-DOE) – Regional Environmental Protection Officer	John Morrison	Kugluktuk	Tel: (867) 982-7445, Fax: (867) 982-3701
Department of Environment (GN-DOE) – Environmental Protection Officer	Ian Rumbolt	Iqaluit	Tel: (867) 975-5924, Fax: (867) 975-5981
Department of Environment (GN-DOE) – Deputy Chief Environmental Protection Officer	Gladis Lemus	Iqaluit	Tel: (867) 975-5907, Fax: (867) 975-5981

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

Sincerely,

Original signed by

Gladis Lemus, Ph.D.
Manager Pollution Control & Air Quality
Department of Environment
C/O Environmental Protection
Government of Nunavut
Box 1000, Stn. 1360
Iqaluit, NU, X0A 0H0
Phone: (867) 975-5907
Fax: (867) 975-5981
Email: glemus@gov.nu.ca