Environment Canada / Environnement Canada

Environmental Protection Branch
Suite 301, 5204 - 50th Avenue
Yellowknife, NT, X1A 1E2

August 25, 2004

Our file: 4703 001 016

Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU
X0B 1J0

Via facsimile

Re: NWB1BOS / NWB2HOP - Water License – Spill Contingency Plan
Proponent - Miramar Hope Bay Ltd.

On behalf of Environment Canada (EC), I have reviewed the information submitted with the above-mentioned application. The following comments are 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. (MHBL) has submitted a Spill Contingency Plan as required for their Water License Application for the Boston project. MHBL has indicated that this Plan also applies to all activities in the Hope Bay belt. The following comments are relative to the submitted Spill Contingency Plan.

1. Environment Canada (EC) finds that Miramar's Spill Contingency Plan is vague and lacks appropriate detail that demonstrates a capability to respond to spills so as to minimize environmental damage. Having this capability requires the development of a comprehensive/cohesive Spill Contingency Plan.

2. The Plan should include a set of procedures to ensure a prompt response, notification, and cleanup in the event of a hazardous substance spill or threat of release.

3. The Plan should identify personnel, their responsibilities for responding to spills, contact numbers and a list of resources available for response (e.g. heavy-equipment operators, spill clean-up materials or companies).

4. All staff shall be instructed regarding these spill/clean-up procedures and tested through annual training exercises to ensure effectiveness.

5. Fuel or hazardous substance transfers
   a. Secondary containment or a surface liner (drip pans, fold-a-tanks, etc) should be placed under all container or vehicle fuel tank inlet and outlet points, hose connections and hose ends during fuel or hazardous substance transfers.
   b. Secondary containment should be of adequate size and volume to contain and hold fluids for the purpose of preventing spills (the worst-case scenario).
   c. Appropriate spill response equipment and clean-up materials (absorbents, containment devices, etc) must be on hand during any transfer of fuel or hazardous substances and at vehicle-maintenance areas.

6. Fuel containers, including barrels, should be marked with the responsible party's name, product type, and year purchased or filled.

7. For an effective spill response there must be some expertise on site to direct the equipment deployment operations. To ensure that the Spill Response Team is prepared to respond to a spill situation in a reasonable manner, hands-on training and familiarization with equipment used for spill containment and recovery is critical. It provides the response crews with an understanding of the limitations or potential problems that may be encountered in the use of the various equipment pieces.

8. Personnel should be aware of the properties of the products that they handle and have access to material safety

data sheets (MSDS) and other sources of information.

9. Any spills of wastes or hazardous materials shall be reported immediately to the NWT 24-hour Spill Line, number (867) 920-8130.

10. Spill contingency plans should include locations of disposal sites approved to accept wastes and means of storage prior to disposal.

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) 669-4708 or by email at ivy.stone@ec.gc.ca.

Sincerely,

Ivy Stone
Environmental Assessment

cc: Steve Harbicht (Head, Assessment & Monitoring, EPB, Environment Canada, Yellowknife, NT)
Mike Fournier (Northern Environmental Assessment Coordinator, EPB, Environment Canada, Yellowknife, NT)