## Indian and Northern Affairs Canada Spill Contingency Plan Review Checklist

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## Comments:

Overall, the reviewer believes that the proponent has put a good deal of effort into developing the spill plan, however, the reviewer has the following suggestions to offer:

- 1. It should be understood that the spill line does not provide disposal instructions for spilled and/or contaminated material. It is the proponent's responsibility to develop a complete plan which addresses the steps to be taken from the start of the spill, up to and including the final clean up and disposal. Regulatory agencies such as INAC, Environment Canada and the Department of Sustainable Development can review the final plan to assess its adequacy and provide advice at that time. Regulatory bodies can, and have, provided information and advice in emergency situations, however, these agencies should not be included in a spill plan as routine advisors.
- In addition to providing the name and contact number for Mr. Peter Holmes, Project Geologist, the proponent is advised to provide 24 hour contact information for the person immediately in charge of this operation and who can activate the spill plan. As this is a remote camp, that person should preferably be on site and capable of coordinating a timely and effective spill clean up operation in situ.

- While the geographic location and size of the facility is provided in the general information package, it is not provided in the body of the spill plan. This information should be included in the spill plan. It should be kept in mind that in many cases, the spill plan becomes a separate document; particularly with respect to first response/regulatory agencies.
- 4. The proponent should provide a complete inventory of all hazardous materials on site: fuel, chemicals and any other material which falls under any of the 9 classes under the Transportation of Dangerous Goods Act. MSDS sheets for these materials should be included with the spill plan. It is acknowledged that these were provided in the body of the application, however, it should be included with the spill plan as well, for reasons already stated in # 4 above.
- 5. The proponent should provide a detailed site map of the area, identifying the location of structures, contaminants storage areas, likely pathways of contaminant flow (in the event of a spill) potentially sensitive areas, such as water bodies, and general topography. The site map should be included with the spill plan.
- The plan does not indicate what type of spill response training, if any, the camp
  personnel have undergone. It is strongly recommended that camp personnel be provided
  with basic spill response training.
- 7. While the reviewer appreciates the details provided in the plan, it is suggested that the proponent obtain a copy of the Guide to the Spill Contingency Planning and Reporting Regulations. This guide was originally developed by Environmental Protection Service of the Government of the Northwest Territories to complement their Spill Contingency Planning and Reporting Regulations; both of which have also been adopted by the Government of Nunavut. The proponent may find these guidelines to be helpful in developing a more realistic spill plan which addresses the specific concerns likely to be expressed by the various regulatory agencies that operate north of 60.
- The reviewer is willing to address any questions that the proponent may have regarding spill contingency plans.

Review Date: November 26, 2003

Reviewer: Robert Eno