



Nunavut Regional Office  
P.O. Box 100, Bldg. 918  
Iqaluit, NU, X0A 0H0

Your file - Votre référence

**NWB2NAD0206**

Our file - Notre référence

**9545-3-2-NAD-G**

09 February 2004

Dear Ms. Beaulieu

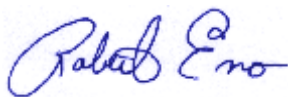
**Re: BHP Billiton Spill Response Plan - Nadluardjuk Lake Area**

Thank you for providing INAC with the opportunity to review the above-mentioned spill plan. Overall, the reviewer finds the plan to be well-thought out and thorough. There are, however, a few comments and suggestions that we would like to offer at this time:

1. The plan provides a complete list of contacts, however, the plan should specifically indicate the name and/or position/title of the individual in charge and/or someone who has the authority to activate and execute a comprehensive spill plan and who can be reached 24 hours per day. This information needs to be provided for the benefit of environmental inspectors who may be required to oversee a cleanup operation in the event of an emergency.
2. The proponent should provide the geographic location of the camp in both UTM and Latitude/Longitude format.
3. The plan indicates that 50 drums of fuel will be stored on site, however it is not clear if any other contaminants, such as lab chemicals, drilling muds etc., will be stored and/or used on site. If such is the case, these materials should be included in the spill plan's inventory of contaminants. For purposes of a spill plan, a contaminant is any substance that falls under any one of the 9 classes of dangerous goods under the Transportation of Dangerous Goods Act (TDGA). Some materials may fall outside of these categories; virgin lube oil is one such example. If in doubt, the regulatory agency with authority over this operation should be consulted.
4. 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; preferably training which provides, in addition to basic classroom/theory components, practical, hands-on exercises.

5. The proponent should update their list of contacts for Territorial and Federal government agencies; particularly the Territorial Government. It should be noted that as of April 1<sup>st</sup>, 1999, the Department of Sustainable Development (DSD), Government of Nunavut (GN) assumed all regulatory roles formerly administered by the Government of the Northwest Territories' (GNWT) Department of Resources, Wildlife and Economic Development (RWED). It should also be noted that INAC, Environment Canada and the Department of Fisheries and Oceans have regional headquarters offices in Iqaluit, Nunavut.
6. The proponent provided an oblique air photo of the camp, indicating the placement of the various man-made and topographic features associated with that camp, however, an overhead, detailed, site map of their camp would be more useful to regulatory reviewers. The map should identify 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. Given the size of the camp and the relatively small amount of fuel being stored there (50 drums), a sketch map is sufficient.
7. A minor point of clarification: the spill plan refers to the "GNWT Spill Line". Please note that the 24 hour spill reporting hotline is a multi-agency (GNWT, GN, INAC, CCG, DFO & Environment Canada).
8. The proponent is advised to 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 is also directed to a document developed by Environment Canada's Yellowknife office in 1990 entitled: "*Guidelines for the Preparation of Hazardous Material Spill Contingency Plans*". The proponent may find these guidelines to be helpful in the event that they wish to fine tune their spill plan.

The reviewer will be happy to provide any additional advice and information upon request.



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