



**Environment Environnement
Canada Canada**

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Our file: 4703 004

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Via Email at licensing@nwb.nunavut.ca

RE: NWB2NAD0206 – BHP Billiton Ltd. - Nadluardjuk Lake Project - Third Draft Spill Response Plan

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*.

BHP Billiton Ltd. has submitted a third draft of their Spill Response Plan for their Nadluardjuk Lake Project. The work under the water license NWB2NAD was completed in August 2002, and was significantly reduced from the original scope of work, as the drilling component was removed.

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

- The spill contingency plan should clearly indicate the location of the camp and all fuel caches using UTM coordinates and latitudes/longitude coordinates.
- Environment Canada requests that the proponent submit a detailed map of the camp, including the location of all buildings, sumps, fuel caches, fuel storage tanks (if any), air strips, and any other features present at the location.
- All fuel caches shall be located above the high water mark of any water body and in such a manner as to prevent the contents from entering any water body frequented by fish.
- It is recommended that the proponent ensure that all equipment necessary to respond to spills is available on site. If some equipment is not kept on site, the spill contingency plan should clearly indicate where the equipment can be procured from. For example, the Spill Response Actions for Diesel, Hydraulic, Lube and Waste Oil indicate that for larger spills on water, a skimmer should be obtained and used on contained slicks. However, no reference is made as to where the skimmer can be obtained from.
- The Plan makes reference to drums being stored within a containing berm where practical. Environment Canada recommends the use of secondary containment, such as self-supporting insta-berms, whenever barreled fuel is being stored on location.
- Environment Canada recommends the use of drip pans, or other similar preventative measures, when refueling equipment on site.

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.meloche@ec.gc.ca.

Yours truly,

Original signed by

Colette Meloche
Environmental Assessment Specialist

cc: (Mike Fournier, Northern Environmental Assessment Coordinator, Environment Canada, Yellowknife)