



Environment Environnement
Canada Canada

Environmental Protection Branch
Qimugjuk Building 969 P.O. Box 1870
Iqaluit, NU X0A 0H0
Tel: (867) 975-4639
Fax: (867) 975-4645

November 27, 2003

Our file: 4703 001

Dionne Filiatrault
Senior Technical Advisor
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0
Tel: (867) 360-6338
Fax: (867) 360-6369

Via Facsimile

RE: NWB2NAN0305 – Emergency Response / Spill Contingency Plan and Abandonment and Restoration Plan

On behalf of Environment Canada (EC), I have reviewed the information submitted in regards to 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*.

Environment Canada recommends that the following changes be made to the Emergency Response / Spill Contingency Plan:

- Section 2.2 – Petroleum Storage and Transport
 - Environment Canada recommends that fuel drums be located within secondary containment, such as a self-supporting insta-berm, or a bermed area with an impermeable liner. This will help to prevent any releases of deleterious substances into the environment.
 - Environment Canada recommends that the proponent include a provision that drip pans be used when refueling equipment on site in order to help prevent spills from occurring.
- Section 2.4 – Greywater and Sewage
 - All sumps shall be located above the high water mark of any waterbody, and in such a manner as to prevent the contents from entering any waterbody frequented by fish.
- Section 5.4 – Spill Response Actions – Antifreeze
 - The action plan indicates that for spills on water, the contaminated water should be pumped into a 205 L drum. Environment Canada recommends that the action plan be amended to include that a mesh screen should be placed over the intake hose in order to help prevent the potential for fish to be removed.
- Section 6.2 – General Equipment
 - Environment Canada recommends that a shovel be included in the contents of the spill kit to assist with the removal of contaminated snow and soil.
 - The location of spill kit on site is not indicated. Environment Canada recommends that the kit be located in an easily accessible and central location, and that this location be identified in the Spill Contingency Plan.
 - While some of the Spill Response Action plans indicate that a skimmer should be used to assist with the clean-up of larger spills on water, this equipment is not

indicated as being available on site. Environment Canada recommends that the location of this equipment be listed in the spill plan, or if it is not on-site, the contact number of where the equipment is available be listed in the Contingency Plan.

Environment Canada recommends that the following changes be made to the Abandonment and Restoration Plan:

- Introduction
 - Environment Canada notes that not all of the headings indicated in the Introduction are covered in the A&R Plan. Environment Canada recommends that these items be addressed prior to the final closure of the site.
- Solid Waste and Sewage Treatment
 - The proponent shall ensure that all sumps are contoured to match the surrounding landscape after they are infilled.
 - The proponent shall ensure that the fire pit / modified 200 L drum is located above the highwater mark and in such a manner as to prevent the contents from entering any waterbody frequented by fish.
- Environment Canada recommends that the A&R Plan include actions to be taken to remediate contaminated soil left as a result of any spills that have occurred or do occur on site.

If there are any changes in the proposed plans, 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,

Colette Meloche
Environmental Assessment Specialist

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