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Department of Environment

Ministère de l'Environnement

Sep. 21, 05

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board

via Email to: licensing@nwb.nunavut.ca

RE: NWB2PEL0507/TR/H,1- BHP BILLITON REVISED SPILL AND GENERAL CONTINGENCY PLAN

Dear Phyllis:

The Department of Environment (DOE) has reviewed the spill and general contingency plan, and based on the Government of Nunavut *Spill Contingency Planning and Reporting Regulations* and *A Guide to the Spill Contingency Planning and Reporting Regulations*, the DOE has the following comments and recommendations to make.

- The description of the facility including location, size and storage capacity should be included, and this is important if persons are unfamiliar with the area.
- The Environmental Protection Service (EPS) of the DOE monitors the movement of hazardous waste, from the generator, carrier to the final disposal, through a tracking document (Waste Manifest). A Waste Manifest must accompany all movements, and all parties must register with the EPS. There is no mention of this procedure in the spill plan.
- A description of the type and the amount of contaminants normally stored on site should be included in the plan. This includes chemical names, volumes or weights of the contaminants.
- A description of the training provided to employees to respond to a spill should be included in the plan as well. A sound training program is necessary when dealing with an emergency situation.

- An inventory and the location of response and clean up equipment available to implement the spill plan should also be included in the plan. This includes your equipment as well as any to be used by another person responding to the spill on your behalf.

We thank NWB for giving us the opportunity to review and provide comments on the revised spill and general contingency plan by the BHP Billiton. Please contact me if you have any further questions or comments.

Yours sincerely,

Original signed by

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