



Nunavut Regional Office
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Your file - Votre référence

NWB2TAH0103

Our file - Notre référence

9545-1-1-TAH-G

February 2, 2004

Dear Ms. Beaulieu

Re: Diamond North Resources – Tahoe Lake Project – Renewal – Type B

Thank you for providing me with an opportunity to review the above licence renewal application.

The proponent appears to have done an excellent job in addressing those areas which I normally examine in detail: solid waste and sewage management; use of drilling muds; closing out of drill sumps; location and storage of fuel and other hazardous materials; disposition of waste oil and contaminated soil; and abandonment and restoration. I have only a handful of comments/questions to offer:

- Re: item 25 (quantities of fuel and chemicals on site) in the water licence application: it is not clear to me what these numbers represent. Litres? Gallons? Number of drums? This should be clarified.
- The proponent has provided MSDS sheets for 11 chemical compounds which they intend to use on site, however, they have not provided the quantities of each. This information should be included under item 25 of the licence application. The material safety data sheets provided by the proponent indicate that none of the aforementioned chemicals fall under TDGR, therefore they need not be included in the spill plan.
- I have included additional comments with regard to the spill contingency plan. These are appended to this letter.

This concludes my comments.

Robert Eno
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Indian and Northern Affairs Canada Spill Contingency Plan Review

Diamonds North Resources Ltd. Fuel Spill Contingency Plan for Drill Sites and Exploration Camps. Tahoe Lake Area, Kitikmeot Region Nunavut.

Comments:

Overall, the proponent appears to have put a good effort into developing their spill plan, however, the reviewer has the following comments and suggestions to offer:

1. The plan does not indicate the name and in particular, the 24 hour contact number of the individual in charge and/or someone who has the authority to activate and execute a comprehensive spill plan. This information needs to be provided for the benefit of environmental inspectors who may be required to oversee a cleanup operation.
2. The proponent should update their list of government contacts for Territorial and Federal government agencies; all of whom have offices in Iqaluit. Furthermore, it should be noted that the Government of the Northwest Territories, Pollution Control Division (which has since changed its name to the Environmental Protection Service) no longer has regulatory authority in Nunavut. The Department of Sustainable Development, Government of Nunavut assumed this role as of April 1st 1999. Both Environment Canada and DIAND now have regional offices in Iqaluit, Nunavut.
3. It should be understood that regulatory agencies such as INAC, Environment Canada and the Department of Sustainable Development do not provide spill response services, however, they 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. It is the proponent's responsibility to develop a complete spill plan which addresses the steps to be taken from the start of the spill, up to and including the final clean up and disposal of contaminated materials.
4. 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. Coordinates should be provided in both UTM and Latitude/Longitude format. It should be kept in mind that in many cases, the spill plan becomes a separate, stand-alone document; particularly with respect to environmental regulatory agencies.
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. This may not be realistic for small, temporary fly-in drilling camps, however a spill plan site map should be provided for the main base camp.

6. 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 the type of training which provides practical, hands-on exercises.
7. An inventory of spill clean up equipment is provided, however, the list should be more specific with respect to quantities (x number of shovels, etc. etc.).
8. The proponent has provided a contact number and name for a firm – Kitnuna Construction Ltd. – that can provide additional resources in the event of a spill, however the plan does not indicate by what means and how quickly these resources can be landed on site in the event of a major spill.
9. 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 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 fine tuning their spill plan.
10. The reviewer is willing to address any questions that the proponent may have regarding spill contingency plans.

Review Date: February 2, 2004
Reviewer: Robert Eno

