

September 14, 2016

Your file - Votre référence 3BM-IGL1520

Our file - Notre référence IQALUIT-#1099043

Licensing Department Nunavut Water Board P.O. Box 119 GJOA HAVEN, NU, X0B 1J0

Sent via email:licensing@nwb-oen.ca

Re: Technical Review of Spill Contingency Plan – Hamlet of Igloolik (Water Licence 3BM-IGL1520)

To Whom It May Concern,

Thank you for the Nunavut Water Board's September 2, 2016 notice of a submission of a Spill Contingency Plan for the above mentioned Water Licence. A memorandum is provided for the Nunavut Water Board's consideration. Comments and recommendations have been provided pursuant to Indigenous and Northern Affairs Canada's mandated responsibilities under the Nunavut Waters and Nunavut Surface Rights Tribunal Act and the Department of Indian Affairs and Northern Development Act.

Please do not hesitate to contact me by telephone at 867-975-3877 or email at Amanda. Winegardner@aandcaadnc.gc.ca for further information.

Sincerely,

Amanda Winegardner Water Management Specialist Water Resources Division Resource Management Directorate Indigenous and Northern Affairs Canada P.O. Box 100 IQALUIT, NU X0A 0H0

Encl.

Cc. Ian Parsons, A/Manager, Water Resources - INAC, Nunavut Regional Office (NRO) Erik Allain, Manager, Field Operations - INAC, NRO



Memorandum

To: Licensing Department, Nunavut Water Board

From: Amanda Winegardner, Water Management Specialist, Indigenous and Northern Affairs Canada,

Nunavut Regional Office (NRO)

Cc: Ian Parsons (INAC; NRO), Erik Allain (INAC; NRO)

Date: September 14, 2016

Re: Technical Review of Spill Contingency Plan for Licence No. 3BM-IGL1520

Licensee: Hamlet of Igloolik Project: Hamlet of Igloolik

Region: Qikiqtani

Comments:

A. Background

The Hamlet of Igloolik (the Licensee) holds a Type "B" Water Licence (Water Licence No. 3BM-IGL1520) for water use and deposit of waste related to the municipality. Since the initial issuance of 3BM-IGL1520, the Hamlet of Igloolik has applied for two amendments to this Water Licence.

Amendment No. 1 was granted for the construction of a new lagoon cell for the Hamlet's sewage lagoon facility. On September 1st, 2016, the Nunavut Water Board (NWB) granted a second amendment for the expansion of the potable water supply reservoir, replacement of the reservoir intake line, inclusion of an alternative potable water source and the construction of a new truck-fill station. In reference to the construction activities associated with the new truck-fill station, a condition was added to the amended Water Licence, now Part E- Item 8, to submit a Spill Contingency Plan within thirty (30) days of the issuance of the amendment.

The Licensee submitted a Spill Contingency Plan (SCP) prepared by Kudlik Construction Ltd. in response to the abovementioned Water License condition.

B. Results of review

On behalf of INAC's Water Resources Division, the following comments and recommendations are provided to the Nunavut Water Board (NWB or Board) consideration:

1. Description of stored materials

Source:

- 1) 3BM-IGL1520 Spill Contingency Plan Igloolik 2016, 2.1: Storage
- 2) 3BM-IGL1520 Spill Contingency Plan Igloolik 2016, 3.3: General procedures

Comment: The SCP submitted by the Hamlet states that diesel on site is stored in a fuel truck with a 10,000 L capacity. The SCP also references gasoline stored on site, but does not describe storage conditions for this fuel.

Recommendation 1: INAC recommends that the Licensee verify the fuel types stored on site and their storage conditions/locations. If fuel is stored in any medium other than the 10,000 L fuel truck, INAC suggests a description of these storage containers be included in the SCP as well as any protective measures to be taken while re-filling/transferring/handling fuel to prevent spills, i.e. drip pans, secondary containment etc.

2. Contents of spill kit

Source:

- 1) 3BM-IGL1520 Spill Contingency Plan Igloolik 2016, 2.2: Response and cleanup equipment
- 2) 3BM-IGL1520 Spill Contingency Plan Igloolik 2016, 3.3: General procedures

Comment: The SCP includes procedures for responding to a fuel spill in various environments (land, ice, snow, muskeg, water bodies), however some of the materials and equipment referenced in these procedures are not indicated in the contents of the spill kit.

Also, the exact location of the spill kit is not reported.

Recommendation 2: INAC recommends that the Licensee verify that they have the necessary equipment on site to deal with a spill in the potential receiving environments.

Recommendation 3: INAC recommends that the Licensee update the SCP to include location(s) for the spill kit(s).

3. Spill Response Team

Source:

1) 3BM-IGL1520 Spill Contingency Plan Igloolik 2016, 3.1: Line of communication

Comment: The SCP indicates that a "Spill Response Team" will respond to any spills on site.

Recommendation 4: INAC recommends that the Licensee update the SCP to include information as to the job titles that make up the Spill Response Team and how they are to be notified in the event of a spill.

Recommendation 5: INAC recommends that the Licensee update the SCP to clarify the position on the work site responsible for determining whether the spill needs to be reported to the Nunavut Spill Line.