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25 March 2011

Richard Dwyer Licensing Administrator Nunavut Water Board P.O. Box 119 Gjoa Haven, NU X0B 1J0

Via email: licensingadmin@nunavutwaterboard.org

RE: 3BC-BGI0813 Spill Contingency Plan

Environment Canada (EC) has reviewed the above-mentioned Spill Contingency Plan (Plan) submitted to the Nunavut Water Board (NWB). The following specialist advice has been provided pursuant to the *Canadian Environmental Protection Act*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

EC file: 4703 003 022

NWB file: 3BC-BGI0813

The University of Alberta has submitted a Spill Contingency Plan to the NWB as a requirement of Part H, Item 1 of water license 3BC-BGI0813 in support of their Devon Ice Cap field site. After review of the Plan, EC provides the following comments for the NWB's consideration:

- Refueling shall not take place below the high water mark of any water body and shall be
 done in such a manner as to prevent any hydrocarbons from entering any water body
 frequented by fish. EC recommends that drip pans, or other similar preventative measures,
 should be used when refuelling equipment.
- A spill kit, including shovels, barrels, absorbents, etc. should be readily available at all locations where fuel is being stored or transferred in order to provide immediate response in the event of a spill and should accommodate 110% of the capacity of the largest fuel storage container.
- EC recommends that the map indicating the fuel storage sites be updated to include the locations of spill kits.
- Also, EC notes that the typo in the title of the plan should be corrected.

If there are any changes in the proposed project or the Plan itself, EC should be notified, as further review may be necessary. Comments previously submitted by R. Bujold on behalf of EC on 22 August 2008 would still apply to this project (see attached). Please do not hesitate to contact the undersigned with any questions or comments with regards to the foregoing at (867) 975-4631 or by email at Paula.C.Smith@ec.gc.ca.

Canada

Yours truly,

Paula C. Smith

Environmental Assessment Coordinator

Carey Ogilvie (Head, Environmental Assessment-North, EPO, Yellowknife, NT) cc:

Ron Bujold (Environmental Assessment Technician, EPO, Yellowknife, NT) Allison Dunn (Sr. Environmental Assessment Coordinator, EPO, Iqaluit, NU)

Environmental Protection Operations 5204 - 50th Avenue Suite 301 Yellowknife NT X1A 1E2

August 22, 2008

Phyllis Beaulieu Manager of Licensing Nunavut Water Board P.O. Box 119 Gjoa Haven NU X0B 1J0 Our file: 4703 003 022

licensing@nunavutwaterboard.org

Re: NWB 3BC-BGI –University of Alberta – Belcher Glacier Project

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*.

Based on the information provided, EC does not have any concerns with the proposed activities as described. It is the opinion of EC that the water use in this application <u>does</u> constitute domestic use pursuant to section 13.7.1 of the *Nunavut Land Claims Agreement*, assuming that there is no change in the project over the time frame indicated in the application. However, EC does recommend that the following general conditions be applied throughout all phases of the project:

- The proponent shall ensure that any chemicals, fuel or wastes associated with the proposed project do not enter waters frequented by fish. It is a requirement of *Section 36(3)* of the *Fisheries Act* that all effluent discharged into water frequented by fish be non-deleterious.
- Environment Canada recommends the use of secondary containment, such as self-supporting insta-berms, when storing barreled fuel on location rather than relying on natural depressions.
- Drip pans, or other similar preventative measures, should be used when refueling equipment on site.
- All spills, <u>regardless of quantity</u>, are to be documented and reported to the NWT 24-hour Spill Line at (867) 920-8130.
- As with solid waste, all sewage should be removed from site and disposed of at an approved facility.

Environmental Protection Operations (EPO) should be notified of changes in the proposed or permitted activities associated with this application.

Please do not hesitate to contact me at (867) 669-4744 or ron.bujold@ec.gc.ca with any questions or comments.

Yours truly,

Ron Bujold Environmental Assessment Technician cc: Carey Ogilvie (Head, Assessment & Monitoring, EPO)
Mike Fournier (Northern Environmental Assessment Coordinator, A&M, EPO)
Jane Fitzgerald (Environmental Assessment Coordinator, EPO)