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3BM-KUG0914 Application for Renewal Amendment

1 message

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Thu, Nov 13, 2014 at 4:41 PM

To: "Alam, Shah" <SAlam@gov.nu.ca>

Cc: Phyllis Beaulieu <phyllis.beaulieu@nwb-oen.ca>, David Hohnstein <david.hohnstein@nwb-oen.ca>

Dear Shah:

Thank you for your emails dated October 24 and October 31, 2014, which addressed the concerns expressed by NWB in a letter, dated August 26, 2014.

I conducted a review of the submitted documents and have found two deficiencies that must be addressed before the Renewal Application can be considered complete: 1) The absence of an updated Spill Contingency Plan and 2) Inconsistencies between the Hamlets's declared status of compliance, and the 2014 Inspection Report status of compliance, submitted by ANNDCC.

1) 1)

The Hamlet of Kugluktuk Environmental Emergency Contingency Plan (2007) states that the Hamlet should annually review and update the information contained in the Plan; so far, no updates of the EECPP have been presented.

Additionally, as per part F Item 1c of the Water Licence, the Hamlet must submit an "expanded Spill Contingency Plan which describes all chemicals and fuels stored by the Hamlet, their locations and quantities". The Plan shall also take into consideration, but not restricted to, comments received during the 2008 application review process, such as:

- The Plan should include a list of available spill response equipment and the name of trained personnel who will be on-site and available in the case of a spill, and
- will implement the use of secondary containments or surface liners where storage/transfer of hazardous fluids take place.
- In addition, the Plan must address proposed response plans / mitigation measures for spills which could threaten the health of the Hamlet water source; such as those which originate either from the uphill waste storage (Qulliq Energy waste storage) or from trespassers.

2)

In regards to the Compliance Plan, the Hamlet's declared status of compliance differs substantially from the status of compliance reported by the ANNDCC Inspector in the 2014 Inspection Report. A spread sheet is attached showing the differences. Given the importance of The Compliance Plan to the renewal process, it is important that the noted deficiencies in the Plan be addressed before the Renewal Application can continue.

Once the Compliance Plan is reviewed, updated and presented along with an updated Spill Contingency Plan, the Application will proceed to the next stage of the Licence process.

Please, do not hesitate to contact me for any question related to the Application.

Regards

Sonia



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