From:	Melissa Joy
To:	richard@arcticwatch.ca; sandra@arcticwatch.ca
Cc:	David Abernethy; John Craig; Phyllis Beaulieu
Subject:	Spill contingency plan (7bl-awl, lease 58F/2-1-2) -additional comments
Date:	Monday, November 05, 2012 3:10:05 PM

Hi Sandra,

There's a few additional comments to provide regarding your Spill Plan (as provided from our Lands Admin dept):

1) Table 1 -the phone number listed for Lands Administration is not correct, 975-4550 is for the Water Resources Manager, Lands Manager is 975-4544. Ideally, please list an Inspector, the Manager of Field Operations and the Lands Manager numbers.
2) Section 12.0 -mentions "chemically compatible liner" but this item is not specifically listed in your inventory, as being something available on site.
3) Other -environmentally sensitive areas should be identified on your map. I.e.: areas not suitable for fuel caches or for spill response (as in areas to direct spills away from should they occur).

Thank you,
Melissa

From: Melissa Joy
Sent: 11/5/2012 10:08:46 AM
To: richard@arcticwatch.ca; sandra@arcticwatch.ca
CC: David.Abernethy@aandc-aadnc.gc.ca
BCC:
Subject: Re: Fwd: Spill contingency Plan - Arctic Watch Lodge

Hi Sandra,

I have received your Spill Plan, thank you. The following are comments regarding items that need to be clarified/updated in the Plan provided. Once these recommendations are incorporated, the Plan can be submitted to the NWB (and is subject to their approval and completeness checks).

Header -no date of last revision provided
Footer -no page numbers

Section 3.0 -refers to site map, App E. No App E provided (Note App A does not meet this requirement unless more information is provided on it).

Section 5.0/8.0 -Note that all spills are reportable, not just those over 100L, within 48hr; 30 days to provide a follow-up report

Table 1 -Please note INAC is now AANDC; I am a Water Resource Officer, not the Manager. Currently the position is vacant, but the phone number remains as 867-975-4295. You should have a WRO listed, as well as the Manager number so you will be able to reach someone regardless.

Section 10.0 -this is insufficient for an inventory. You should have a list with the numbers of available spill response equipment on site: you need to determine what your standard requirements are for your site activities, identify where on site your kits and supplies will be stored. You need to show what you have on site and how you are maintaining it.
For example:
-There are 2 spill kits on site located at x and y. Each contains a standard inventory of the following: 100 spill pads, 1 spark-proof shovel, x4-6ft absorbant booms, 10ftx4ft polypropylene sheet, 10kg bag of peatmoss, etc....whatever actually constitutes the supplies in your kits and what is available on-site to deal with spills.

-Extra spill pads, xyz, and x-equipment are located in building x. Inventory is conducted at the

end/beginning of operating season and resplenished at such and such a time.

Section 12.0 - note that "soil" does not accurately describe substrate on site: gravel/gravelly substrate and silty substrate are present at the airstrip site.

-should be a note in there regarding storage and disposal (snow, soil/substrate, sorbent materials, etc), as well as maintaining records/photos/etc and necessary documentation

Section 13.0 - "Conduct regular inspections of all machinery hydraulic, fuel and cooling systems. Repair leaks immediately" should be it's own line or subsection (formatting).

"Pre-assemble and maintain emergency spill response equipment..." should also be noted (along with locations) in the spill response equipment section (10.0)

-record of daily/weekly inspections (chart/table) to be kept as back up (so someone signs off on inspections done)
-weekly inspections are not sufficient when operational -this needs to be daily, especially on crew change days; also there needs to be a commitment to monitor caches at least once annually when not operational
-where are pre-assembled kits to be kept?

Other:
The map provided in App A, this is very vague. No coordinates provided or camp layout provided
-need a map showing camp layout and infrastructure locations, incinerator, emergency shack, airstrip, fuel caches, etc.
-missing info for fuel cache, spill kit, supplies and equipment stored/kept at airstrip.

-need to incorporate a few more prevention strategies -namely with respect to the bulldozer (ie. use of appropriately sized drip pans; procedures for winter storage.

Section 15.0 -need to list other items relevant to spill response, such as the bulldozer, boat, or secondary containment pallets.

**Please ensure you copy me on submissions sent to the NWB.

Regards,
Melissa

Melissa Joy, B. Env Sc.
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>>> sandra Sullivan <sandra@arcticwatch.ca> 10/30/2012 3:28 PM >>>

Begin forwarded message:

From: sandra Sullivan <sandra@arcticwatch.ca>
Date: October 30, 2012 2:02:02 PM EDT
To: melissa.joy@aanndc-aadnc.gc.ca
Cc: Nunavut Water Board <licensing@nunavutwaterboard.org>
Subject: Spill contingency Plan - Arctic Watch Lodge

Good Day Ms. Joy

Following notification of non-compliance regarding the Spill Contingency Plan for Arctic Watch Wilderness Lodge, please find enclosed the revised and update Plan.

If you should require any additional information, please do not hesitate to contact us.

Regards.
Sandra Sullivan

Administrator
Canadian Arctic Holidays
262 Pritchard Road
Alcove, Quebec
J0X 1A0

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