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December 24, 2012

Ms. Megan Porter
Licensing Administrator Assistant
Nunavut Water Board
P.O. Box 119
GJOA HAVEN, NU X0E 1J0

Our reference:
IQALUIT-#615679

Your reference:
7BL-AWL1015

Sent via email

**Re: Arctic Watch Wilderness Lodge – Canadian Arctic Holidays Ltd. – Revised
Spill Contingency Plan – Qikiqtani Region**

Dear Ms. Porter,

Thank you for your November 23, 2012 request for written representations on the above referenced revised Spill Contingency Plan.

A Technical Review Memorandum is provided for the Board's consideration. Comments/ recommendations have been provided pursuant to the Department'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 867-975-4555 or email at David.Abernethy@aandc-aadnc.gc.ca to discuss this submission.

Regards,

David Abernethy
Regional Coordinator
Water Resources Division

Encl.

c.c.: Murray Ball, Manager of Water Resources (AANDC - Nunavut)
Phyllis Beaulieu, Manager of Licensing (NWB)

TECHNICAL REVIEW MEMORANDUM

TO	Megan Porter Licensing Administrator Assistant Nunavut Water Board	OUR REFERENCE File #9545-2-3.7BL.AWLA IQALUIT-#615679
FROM	David Abernethy Water Resources Regional Coordinator Aboriginal Affairs and Northern Development Canada	YOUR REFERENCE 7BL-AWL1015/TR/H1 DATE December 24, 2012
SUBJECT	Arctic Watch Wilderness Lodge – Canadian Arctic Holidays Ltd. – Revised Spill Contingency Plan – Qikiqtani Region	

A. PROJECT DESCRIPTION

Pursuant to Part H, Item 1 of their Arctic Watch Wilderness Lodge's Type B licence, No. 7BL-AWL1015, Canadian Arctic Holidays Ltd. (CAHL) submitted a revised spill contingency plan, dated October 2012. On November 23, 2012 the Nunavut Water Board (NWB or Board) distributed this plan to interested parties for review.

Part H, Item 1 of the licence states:

The Licensee shall resubmit to the Board for approval within thirty (30) days following the issuance of the Licence, a revised Spill Contingency Plan that is prepared in the format set out by the Consolidation of Spill Contingency Planning and Reporting Regulations R-068-93 and includes the following:

- a. A title page, introduction, table of contents, page numbers, date of latest revision, and effective date of the plan;
- b. Contact information for the on-site project coordinator;
- c. Topographic map that references all fuel caches, spill kits, grey water sumps, sewage pits, and nearby water bodies;
- d. A list of all spill response equipment and supplies as well as spill kit contents;
- e. A copy of the NT-NU Spill Report Form (available on ftp site);
- f. Material Safety Data Sheets for the chemicals used or stored on site should either be included as an appendix or reference;
- g. Contingency measures to address different spill scenarios such as spills on land, water, or ice;
- h. A section pertaining to training; and,
- i. A contact number for AANDC's Manager of Field Operations, 867-975-4295, to be contacted in the event of a spill.

B. RESULTS OF REVIEW

On behalf of the Aboriginal Affairs and Northern Development Canada (AANDC) Water Resources Division, the following comments/ recommendations are submitted for the Board's consideration,

1. Submission of a revised plan
 - The AANDC Water Resources Division commends CAHL for the improvements made to their project's original Spill Contingency Plan;
 - AANDC recommends that in conjunction with their 2012 Annual Report submission, CAHL submit a revised Spill Contingency Plan that addresses the comments/ recommendations identified in this review memo as well as those of other interested parties.
2. Presentation
 - Pursuant to Part H, Item 1 a. of their licence, CAHL should revise their Spill Contingency Plan to include page numbers and the plan's effective date.
3. Spill response equipment and supplies
 - Pursuant to Part H, Item 1 d. of their licence, CAHL should revise their Spill Contingency Plan to include a list of all spill response equipment and supplies, including spill kit contents (i.e., provide a complete inventory of available response equipment and supplies that can be used when implementing the spill contingency plan).
4. Contingency measures to address different spill scenarios
 - Pursuant to Part H, Item 1 g. of the licence, CAHL should revise their Spill Contingency Plan to ensure that contingency measures are established for potential spill response scenarios such as spills on land, water, or ice. Although Section 12.0 General Procedures of the submitted plan outlines response procedures for spills on land and snow-covered ground, sections specific to spills on land, water, or ice should be provided.
5. Contact information for Manager of Field Operations
 - Pursuant to Part H, Item 1 i. of the licence, CAHL should revise their Spill Contingency Plan to provide the right contact number for AANDC's Manager of Field Operations (i.e., 867-975-4295). The Contact List included in Table 1 of the submitted plan does not have the correct number and incorrectly identifies Melissa Joy as the Manager (she is a Water Resource Officer). The position title, Manager of Field Operations, which is based in the department's Nunavut Regional Office, should be listed under the table's location heading to be consistent with other contacts.

6. Contact information for Manager of Land Administration
 - The contact information for AANDC's Manager of Land Administration included in Table 1 of the submitted plan should be revised to reference the correct position title (i.e., not Land Administration Minister) and telephone number, i.e., 867-975-4280.
7. Annual review of Spill Contingency Plan
 - In accordance with Section 7 of the [Government of Nunavut's Spill Contingency Planning and Reporting Regulations](#), "the person responsible for preparing a spill contingency plan shall review the plan annually." AANDC recommends that this action be coordinated with the submission of Annual Reports with revised plans submitted to the NWB pursuant to Part B, Item 2 c. of the licence.

Prepared by David Abernethy