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Department of Environment

Ministère de l'Environnement

September 3, 2008

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board

via Email to: licensing@nunavutwaterboard.org

RE: NWB FILE # 8BW-CLY – Qikiqtaaluk Corporation – Cape Christian-Clyde River Access Road

Dear Ms. Beaulieu:

The Government of Nunavut, Department of Environment (DOE) has reviewed the water license application from Qikiqtaaluk Corporation for the Cape Christian-Clyde River Access Road, and has the following comments and recommendations to make based on the *Environmental Protection Act* regarding spill contingency planning.

Spill Contingency Plan

Based on the DOE *Spill Contingency Planning and Reporting Regulations*, *Contingency Planning and Spill Reporting in Nunavut: a Guide to the New Regulations*, and *Guideline for the General Management of Hazardous Waste in Nunavut*, DOE has the following comments and recommendations to make:

- The DOE contact number is inaccurate and should be updated (Section 8.1 of the Spill Contingency Plan). The correct numbers at DOE is (867) 975-7700 for general reception or (867) 975-7748 for the Manager of Pollution Control.
- To prevent spreading in the event of a spill, fuel stored in drums should be located, whenever practical, in a natural depression a minimum distance of 90 feet from all bodies of water, preferably in an area of low permeability. All fuel storage containers should be situated in a manner that allows easy access and removal of containers in the event of leaks or spills. Large fuel caches in excess of 20 drums should be inspected daily.
- All chemicals should be stored in a safe and chemically-compatible manner a minimum of 90 feet from all bodies of water.
- The DOE, Environmental Protection Service (EPS) monitors the movement of hazardous waste, from the generator, carrier to the final disposal, through a tracking document (Waste Manifest). A Waste Manifest must accompany all movements, and all parties must register with the EPS. There is no mention of this procedure in the spill plan.

The GN thanks NWB for the opportunity to provide comments on the Qikiqtaaluk Corporation's water license application. Please contact us if you have further questions.

Yours sincerely,

Original signed by

