

Info

From: Keith Morrison
Sent: December-19-18 10:03 AM
To: LMitchell@GOV.NU.CA
Cc: Info; Sophia Granchinho
Subject: NIRB 18XN049 Arviat Fuel Capacity Increase

Hello, Lisa.

I was just assigned the Arviat tank farm project and in reviewing the application there are several major issues that need to be resolved before NIRB can move forward with the application.

First, the description of activities is exceedingly vague. There is insufficient detail on the type of equipment and material required in order to construct the new tank farm and fuel system, no description of activities necessary to prepare the area for construction (if any), and so on. While some of the information can be extrapolated from the Needs Assessment Study, it hasn't been entered into the online application form and would, in any case, still not be sufficient to cover the issues in question.

Second, there is no information on the decommissioning of the existing tank farm and pipelines; no information on dismantling, removal, and disposal of the existing infrastructure, remediation (if necessary) of contaminated materials and soils, and no information on environmental and public safety measure and protection.

Given that the new tank facility seems to involve no overlap with the existing infrastructure, it might be worth considering whether decommissioning of the old facilities might be considered a separate project for the purposes of assessment.

I will be sending out an information request noting that what has been provided is currently insufficient to carry out any sort of impact review, and until more details on the issues indicated above are provided, we can't move forward.

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