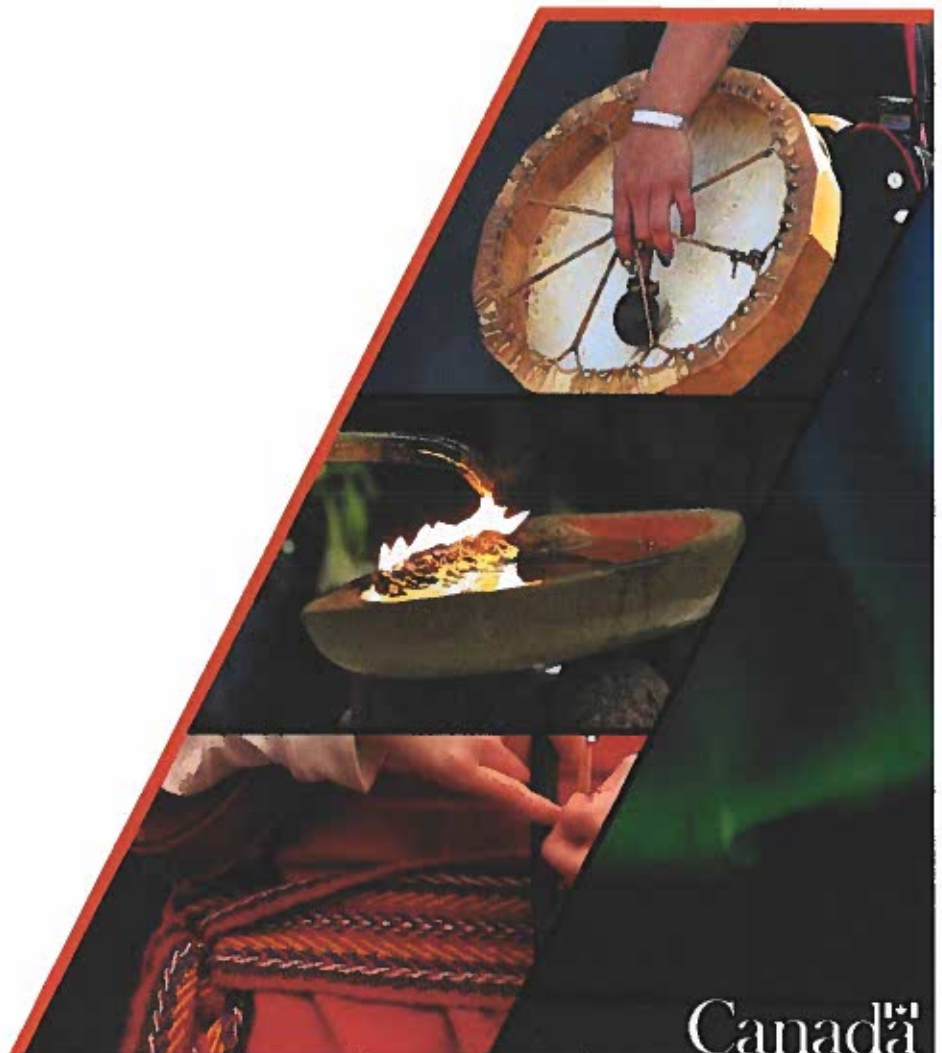




CIRNAC COMMENTS TO NIRB

Re: Notice of Screening for the Hamlet of
Naujaat's "Community Access Trail" Project



Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence
NIRB file #19PN003
Our file - Notre référence
CIDM #1251268

May 28, 2019

Talia Maksagak
Junior Technical Advisor
Nunavut Impact Review Board
PO Box 1360
Cambridge Bay, NU, X0B 0C0
Via electronic mail to: info@nirb.ca

Dear Ms. Maksagak,

Re: Notice of Screening for the Hamlet of Naujaat's "Community Access Trail" Project

On May 7, 2019, the Nunavut Impact Review Board (NIRB) invited parties to comment on the Hamlet of Naujaat's "Community Access Trail" project proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) reviewed the project proposal and related documents and offers the responses below as it pertains to the NIRB's request:

Any matter of importance to the Party related to the project proposal:

Fuel Management:

In the project application supporting document: "Environmental and Design Considerations Naujaat Community Access Trail", the proponent discusses "Hazardous Materials Handling Procedures" (which includes fuel) and "Spill Prevention and Emergency Response Procedures". The procedures indicate that fuel will be used for refueling, but it is unclear how the fuel will be managed routinely (outside of emergency spills) to prevent impacts.

CIRNAC recommends the following project specific terms and conditions pertaining to the spill prevention plan and fuel management procedures be included in the Screening Decision Report, should the project proceed:

- The spill prevention plan should be more specific about what items the spill kits will contain. At a minimum the kits should include: shovels, pumps, barrels, drip pans, and absorbents.



- The spill prevention plan should indicate the intended locations of spill kits which includes having spill kits readily available at fuel storage/handling areas and during any transfer of fuel,
- The spill prevention plan should be updated to indicate that all spills of fuel or other deleterious materials of any amount must be reported immediately to the 24-hour spill line 867-920-8130 (if applicable),
- Refuelling and fuel storage should be a minimum of thirty-one (31) metres away from the high water mark of any water body and in such a manner as to prevent release into the environment,
- Secondary containment or a surface liner should be used when storing barreled fuel at all locations,
- Drip pans or other equivalent devices should be used when refueling equipment on-site, and
- All fuel and chemicals should be stored such to prevent access to wildlife.

CIRNAC appreciates the opportunity to provide comments and looks forward to working with the NIRB and the proponent, as necessary, throughout any further review of this project. If you have any questions, please contact Krista Pooley at (867) 975-4741, or by e-mail at krista.pooley@canada.ca.

Sincerely,



Felexce Ngwa
Manager, Impact Assessment

