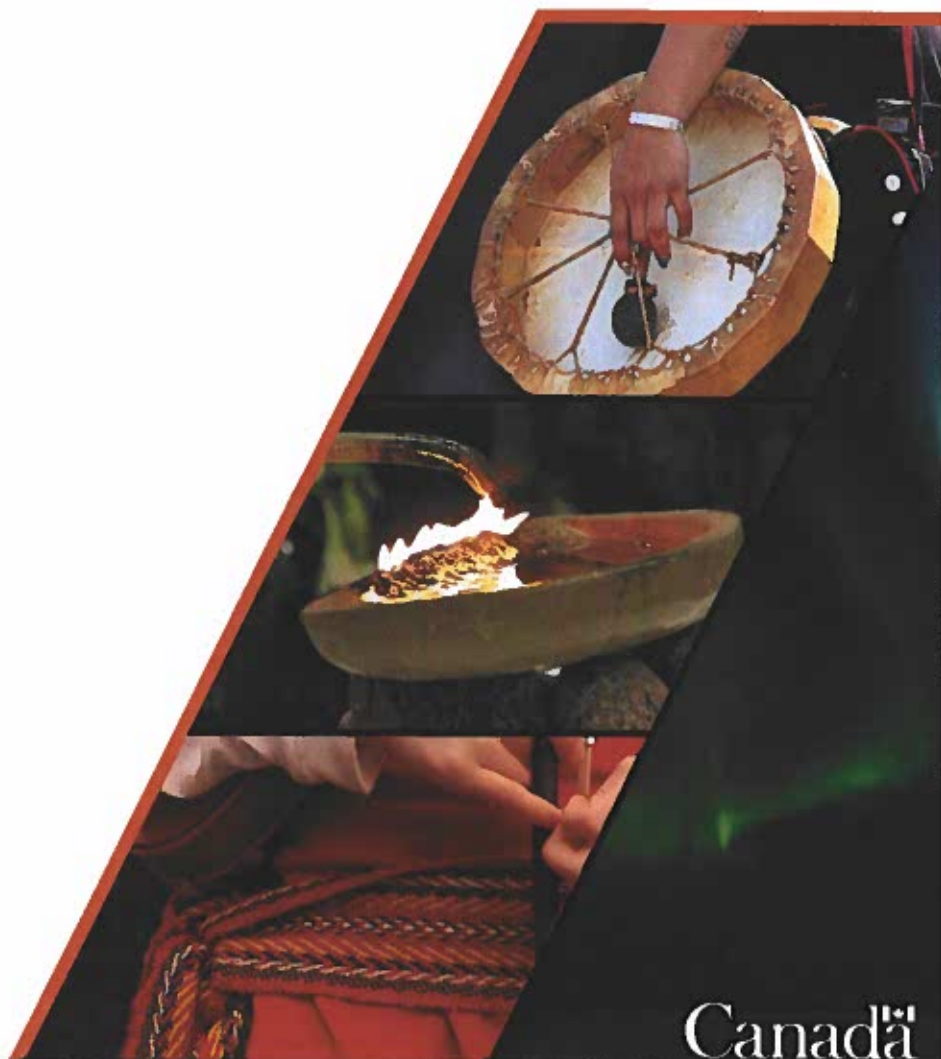
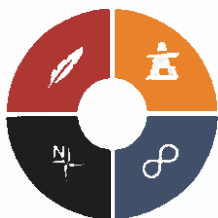




CIRNAC COMMENTS TO NIRB

Re: Revised Notice of Screening for “Qulliq Energy Corporation’s “Kugluktuk Power Plant and Solar” Project Proposal



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

Your file - Votre référence
19XN011
Our file - Notre référence
CIDMS # 1256696

July 15, 2019

Keith Morrison
Technical Advisor II
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0
Via electronic mail to: info@nirb.ca

Re: Revised Notice of Screening for Qulliq Energy Corporation's "Kugluktuk Power Plant and Solar" Project Proposal

Dear Mr. Morrison,

On June 7, 2019, the Nunavut Impact Review Board (NIRB) invited parties to comment on the Qulliq Energy Corporation's (the Proponent) "Kugluktuk Power Plant and Solar" revised project proposal (the project). Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) appreciates the opportunity to provide comments and offers the responses below as it pertains to the NIRB's request.

Whether the project proposal is likely to arouse significant public concern; and if so, why:

Based on the lack of information regarding the Proponents community engagement program, CIRNAC is unable to offer comments on whether the project is likely to arouse significant public concern. CIRNAC recommends that the Proponent consider updating the community about the addition of two bulk fuel storage tanks to the proposed project and provide the NIRB a detailed summary of the consultations including any specific comments or concerns raised by the communities.

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

CIRNAC has reviewed the Proponents letter to the NIRB "Kugluktuk Power Plant and Solar Proposal (19XN011) – Bulk Fuel Storage Addendum" received June 10, 2019. In the letter the Proponent details plans for construction of two bulk fuel storage tanks and outlines a spill contingency planning rationale. In addition to the proposed construction



and contingency plans CIRNAC recommends the NIRB consider project specific terms and conditions to address the following should the project proceed:

Fuel Management

- Re-fuelling of all equipment should occur a minimum of thirty-one (31) metres away from the high water mark of any waterbody.

Potential for Storage Tank Spills/Leaks

- Addition of an oil/water separator may for large secondary containment areas to deal with higher volumes of rain and melt water which could become contaminated,
- Where feasible, tanks in fuel storage areas should be elevated so that the presence of leaks can be readily observed,
- Areas should be kept clear of debris and snow to facilitate routine inspections for leaks, and
- Before disposal any accumulated snow or water should first be checked for fuel contamination to inform on the appropriate disposal method required.

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

Sincerely,



Krista Pooley
Environmental Assessment Coordinator

