



Contaminants and Remediation Directorate
 PO Box 1500,
 Yellowknife NT X1A 2R3

July 11, 2008

Your file Votre référence

Northwest Territories Water Board
 5114- 49th St CJCD Building
 PO Box 1326
 Yellowknife, NT
 X1A 2N9

Our file Notre référence

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CHAIR	—
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Dear Sir/Madam:

Subject: Water Licence N7L1-1824 Submittals - Johnson Point Remediation Project

Further to the electronic submission of submittals today, please find attached hard copies of the following submittals associated with the Johnson Point Water Licence N7L1-1824 held by the Contaminants and Remediation Directorate (CARD) of INAC:

- Quality Assurance/Quality Control Plan (QA/QC Plan) as per SNP Part B Item 7. Note that this plan has already been submitted to the analyst for approval.
- Spill Contingency Plan as per Part F Item 1
- Further details on the greywater treatment system from the remediation contractor E. Gruben's Transport

If there are any questions or concerns regarding this supplementary information, please contact me at (867)669-2756 or pikée@inac-ainc.gc.ca or Joel Gowman at (867) 669-2423.

Sincerely,

Emma Pike
 Project Manager



Site Specific Spill Contingency Plan Johnson Point Cleanup

Introduction

This plan is being submitted to fulfill the requirements of Water License No. N7L1-1824 and Land Use Permit N2008X0011 issued to the Contaminate and Remediation Directorate of Indian and Northern Affairs.

Johnson Point is an abandoned oil and gas staging area located on East Coast of Banks Island, NWT, approximately 270 kilometers Northeast of the Community of Sachs Harbour. The site is located at approximately 72°46' N, 118° 30' W.

E. Gruben's Transport Ltd. (EGT) of Tuktoyaktuk is the prime contractor responsible for the cleanup of the Johnson Point site, contracted to Public Works and Government Services Canada.

Work on the site will include contaminated soil treatment and containerization, facility demolition and containerization, debris cleanup and off-site transport of hazardous and non-hazardous materials.

The Johnson Point site is also being used by Diamonds North, a diamond exploration company, which maintains a tent camp including its own fuel storage as well as fuel storage for helicopter transport around the Banks Island. EGT cannot be responsible for the storage, containment or transfer of fuels belonging to Diamonds North or its contractors. However, EGT will make every effort to assist in containerization and cleanup of any Diamonds North spills should they occur.

Mobilization to the site will take place via Northern Transportation Company Limited (NTCL) barge in late-July of 2008. Contract work will be conducted through the summer of 2008 and 2009 and may possibly extend into 2010. Demobilization from the site will take place in July or August of 2010.

Spill Prevention

EGT emphasizes the prevention of spills through training, refueling procedures and the provision of adequate and appropriate equipment.

Contractor's fuel storage tanks designated for the site are steel-bermed tanks with berm capacity of 110% of tank volume. None of the existing on site tanks will be used for EGT fuel storage. Fuel will be delivered to the site by NTCL barges and will be stored in NTCL barge tanks during transport. A 2001 Kenworth T800B Fuel Truck owned and operated by EGT using an experienced TDG certified fuel handler will transfer fuel from

the barge tanks to the EGT site storage tanks once the site storage tanks have been placed on site. Site storage tanks will be filled to 85% capacity to allow for expansion of fuel as it warms.

Contractor's fuel storage tanks will be located adjacent to the camp generator building on the north end of Potential Borrow Area 8. Fuel storage tanks will be located greater than 30 meters from the closest body of water.

Gasoline will be stored in a 500 gallon integrally-bermed fuel tank. All gasoline fueling will take place over drip trays, including use of day-use jerry-cans for gasoline powered tools (cut-off saws and chain-saws).

There will be no bulk storage of oils, lubes, antifreeze in containers larger than 45 gallon drums. All will be supplied to site in 45 gallon drums and 5 gallon (22.5 l) pails or smaller containers. All drums will be new.

Propane will be used onsite for the camp facilities and will be stored in 1000 lb propane tanks and 350 lb "pig" tanks. Propane for shop use will be supplied in 100 lb and 20 lb cylinders.

Tanks, drums and cylinders belonging to EGT will be clearly marked with spray paint and stencils to distinguish them from tanks, drums and cylinders belonging to others on site.

MSDS will be available for all consumable products on site and all EGT personnel will have received WHMIS training. All handling and transport of dangerous goods will be supervised by TDG certified personnel.

Vehicles will be parked over drip trays.

The Equipment Foreman will inspect all fuel storage tanks daily. Wildlife monitors will also be required to conduct daily checks of fuel storage facilities as part of their normal rounds of inspection.

See attached fueling and fuel transfer procedures.

Spill Response

All pick-ups and heavy equipment will carry small "equipment" spill kits. The foreman's truck, the generator shack, fuel storage tanks and refueling areas will have more substantial "drum" spill kits. All vehicles will carry a small quantity of oil absorbent rags. All mobile equipment will have company frequency "truck-to-truck" radios, as will the EGT site office and the Medic.

All spills will be reported and recorded for internal records. Minor spills will be reported to the Equipment Foreman by radio. The Equipment Foreman will assess the situation, including the potential risks to personnel, will decide on the most appropriate immediate response and will report to the Site Superintendent. This may simply involve applying sorbent pads or shoveling of granular materials into plastic bags for transfer to the PHC soils treatment area for on-site treatment or possibly boxing soils in 2.3 cu.m. sea-cans with hydro-carbon resistant liner.

A larger, more catastrophic spill would result in Emergency Response Procedures. The same emergency radio procedures will apply as for a medical emergency. The person who discovers the spill will use the radio call, "MEDIC! MEDIC! MEDIC!". This will signal all site personnel to cease any other radio use, cease other work and stand by for further direction. The Medic will take charge but in this case pass control of the situation to the Equipment Foreman and/or Site Superintendent as soon as the emergency situation has been identified as a fuel spill.

The response to a larger spill may involve allocating heavy equipment and/or allocating personnel to the task. Appropriate PPE for the task will be checked and a Job Safety Analysis will be conducted for cleanup effort.

Containment and Recovery

The safety of all personnel will be the first consideration in any containment and recovery operations.

Containment may be performed by hand or with the use of heavy equipment. Sand berms can be constructed and booms can be deployed. Leaks can be plugged using patches, plugs and plugging compounds. Product can be pumped out or suctioned out of leaking containers

Recovery of spilled/leaked product could involve pumping, direct suction into vacuum tank on Gator or pumping into suck-on tank mounted on the bedtruck, shoveling of contaminated soil by hand or with heavy equipment, transfer to portable tanks or drums or to fixed tanks.

As well as a supply of heavy equipment (3 excavators, 2 loaders, 2 cats, 2 rock trucks, 1 bodyjob dumptruck, bedtruck and Gator) and a ready and plentiful supply of labour, we have at the site considerable other materials and equipment for the purposes of our contract work which could be used for spill containment and recovery. These include:

Drum Spill Kits: Polyethylene overpack drum containing 2 ea. 10' socks, 5 ea 4' socks, 1 lb. pre-mixed plugging compound, 50 pads, 5 pillows, 1 drain cover, 1 caution tape, 2 prs nitrile gloves, 2 ea safety goggles, 2 coveralls, 10 disposal bags.

Environment Canada:

867-669-4700
(fax) 867-873-8185

Grey Water/Black Water

The camp facilities will utilize Pacto waterless toilets. Black waste is captured in double bags, an inner polythene bag and an outer polythene and foil bag, and is incinerated. Therefore there will be a grey-water system but no sewage storage or piping.

Grey water

Grey water will be passed through a macerator pump, settling tank and will be stored in shallow, bermed, lined, open-air sumps. Grey water will be sampled in the lined sumps prior to discharge to ensure it meets Water Licence discharge criteria. We will construct a number of holding sumps so that we can separate the in-use grey water storage sump from grey water that is settling and waiting for sample results. A description and schematic of the grey water system has been previously submitted.

Black water.

“Black water” from Pacto toilets will also be incinerated in the same new two-chamber Westland Environmental CY-2050-FA “D” diesel-fired incinerator as is used for camp-generated garbage. [Incinerator specifications are included as Appendix I]. This incinerator will be supplied with a larger than normal 770,000 BTU primary incinerator to achieve temperatures of 1000 degrees C. The secondary chamber should also achieve temperatures in the 850 to 1000 degree C range to satisfy the requirements of Canada Wide Emissions Standards.

Pacto toilets are commonly used in Alaska in remote camp locations and are also used in the Sahtu region of the Northwest Territories in the oil and gas exploration industry. Pacto toilet waste is incinerated in Alaska using the CY-2050-FA “D” incinerator. We have also had success in incinerating Pacto waste in a slightly larger camp during Atkinson Point cleanup operations in 2007, with no spills or incidents.

Pacto Toilet Waste Handling Procedures

Handling of the waste contained in the double-bagged Pacto system requires certain defined procedures. However, handled correctly there is almost no risk of spill. Toilets also remain cleaner for multiple users than a standard water-toilet because the toilet “bowl” is replaced with each use as the “sausage” tubes drop down. Risks of contamination of other parts of the bathroom facilities from the toilets are also lessened because the general camp cleaning staff do not have to handle or clean toilets at all.

The Pacto toilet maintainer/cleaner will also be the incinerator operator. In this way only one member of staff handles all camp and black-water waste.

The Pacto handling for containment of waste is as follows:

1. The inner Pacto polythene foil "sausage" bag drops with each use into the reinforced podium bag contained in the podium tray. The "sausage" bags are clearly marked with a warning that the end of the roll is approaching with more than ten remaining uses.
2. The maintainer lifts the pedestal from the podium and triple-ties the inner bag. The maintainer then ties and tapes the outer reinforced bag.
3. The tied-off double-bagged waste is then transferred from the podium tray to a Rubber-Maid tray placed adjacent to the podium.
4. The Rubber-Maid tray is then carried out of the camp and placed in a wheelbarrow for transport to the incinerator. [Note: at this point the Pacto waste has 4 layers of containment.]
5. The Pacto bag is transferred from the tray to the incinerator, one bag at a time and mixed with the most easily combustible of the camp-generated garbage.
6. The secondary reinforced Pacto bags are designed to contain over 40 individual toilet uses. We replace the main-camp and high-use bags daily so that, on average, less than 20 uses have occurred. In this way the weight that must be carried in each bag is greatly lessened. As there is no flush water involved in these toilets the weight is relatively light.

Pacto PPE

The handling of Pacto waste bags and toilets is a cleaner operation than standard water toilet cleaning in that there is neither a bowl to clean nor toilet bowl brush to use. PPE required is therefore no greater than would be standard for water toilet cleaning in a camp or hotel. Rubber gloves should be used with optional latex inner gloves if it is found by the maintainer to be difficult to knot bags with rubber gloves on. Disposable "Tyvek" coveralls will be used inside the camp along with safety glasses or protective shields.

PPE required for outdoor work and operation of the incinerator will include standard PPE of fire-retardant coveralls, hard-hat, steel-toed work boots as well as a face-shield.

Pacto maintainers will be required to have Hepatitis A and tetanus inoculations prior to working with Pacto toilets. These are available with prior arrangement at community Health Stations.

Potential Pacto Spills

The potential for Pacto spills is minimal. At most times the waste is triple-contained and there is at no-time exposed waste. Volumes being handled at any one time are minimal.

A spill inside the camp facility would require an immediate limiting of access to the area of the spill and a clean-up involving a wet-dry shop vacuum. Thorough decontamination

of floors would have to be carried out using detergents and mops and rags as required. If a spill were to occur in one of the few carpeted areas of the camp a wet-dry shop vac would be initially used and the carpet section would then be cut out, removed and incinerated. Rubber gloves and rubber boots and disposable coveralls would also be required. Contaminated gloves, mops and rags would be incinerated.

A spill outside of the camp would involve shoveling of contaminated soil into the RubberMaid tray or the wheelbarrow. The waste could then be transferred to new double reinforced Pacto bags and incinerated along with the dirt.

Training

All Pacto maintainers will be trained in the proper operation and use of the toilets, personal hygiene practices, the use of anti-bacterial soaps, protection of cuts and abrasions and other possible means of exposure including eating and smoking.

EMERGENCY AND REGULATORY CONTACTS

**For Medical Evacuation contact Inuvik Regional Hospital at 867-777-8000.
Request "OUT PATIENTS"**

**Workers' Safety & Compensation Commission – Accident Reporting
(formerly Workers' Compensation Board)**
TEL: 800-661-0792
FAX: 866-277-3677

Northwest Territories Spill Line **TEL: 867-920-8130**

NWT Water Board **TEL: 867-777-3361**
Inuvik District Office **FAX 867-777-2090**

I.N.A.C. **TEL: 867-777-3361**
North Mackenzie District Office - Land Use Permit **FAX: 867-777-2090**

I.N.A.C. **TEL: 867-669-2756**
Project Manager - Emma Pike **FAX: 867-669-2756**

P.W.G.S.C. **TEL: 780-497-3862**
Project Engineer -Brad Thompson **FAX: 780-497-3842**

EMERGENCY CONTACT LIST - EGT MANAGEMENT & STAFF

Tuk Base Camp and Night Security **TEL: 867-977-7000**
FAX: 867-977-7040

Superintendent of Operations **TEL: 867-977-7017**
Doug Saunders **CELL:867-678-0045**

Night Security Cellphone **CELL:867-777-1654**

Safety/Loss Control **TEL: 867-977-7014**
Monty Gibb

Project Manager **TEL: 867-977-7010**
Bob Stefure **CELL:867-678-0037**

Chief Executive Officer **TEL: 867-977-7008**
Russell Newmark **CELL:867-678-0040**

EGT Inuvik Office **TEL: 867-777-4975**
FAX: 867-777-4374

OTHER EMERGENCY RESPONSE CONTACT LIST – OUTSIDE AGENCIES

Sachs Harbour Health Centre	TEL: 867-690-4181
Sachs Harbour RCMP	TEL: 867-690-1111
Inuvik Renewable Resources	TEL: 867-777-7308 CELL:867-777-1185
Inuvik Hospital	TEL: 867-777-8000
Inuvik RCMP	TEL: 867-777-1111
Aklak Air Ltd.	TEL: 867-777-3555
Canadian Helicopters	TEL: 867-777-2424



E.GRUBEN'S TRANSPORT LTD

FUELING UP EQUIPMENT AND VEHICLES

When approaching fueling station you must first observe the area for any unusual appearances.

- Fuel on the ground
- Hoses and nozzle on the ground
- Nozzle torn off hose
- Hose torn off pump or tank

If you notice anything like that, immediately report it to your supervisor, before fueling up.

- Before you begin fueling procedures shut off engine.
- Put drip pan into place.
- Clean around fill cap (dust, mud, snow, ice, etc.) .
- Open filler cap carefully, a vacuum might be present.
- If filler cap can't be reached from the ground and you must climb onto the equipment, use extreme caution, especially during adverse conditions (wet, mud, snow and ice. If no steps or platforms are available use an appropriate ladder.
- Avoid going up steps or ladder with hose
- Turn pump on if so equipped and / or open valve at tank.
- Begin fueling, don't leave nozzle unattended. NEVER rely on automatic shut off.
- Don't overfill tank leave room for expansion.
- When finished reverse procedure.
- Use three point contact when ascending or descending.
- In case of a spill protect yourself, fuels can cause severe eye and skin irritations, contain the spill if possible, report the spill.

READ LABELS OR MSDS, in particular FIRST AID MEASURES

- Make sure pump and / or valves are turned off and hose put back in proper place.
- Don't forget to put cap back on

This Job procedure is to be utilized as a guide only. Worksite practices and/or worksite conditions may necessitate change to the content, or order, of task steps in order to complete the job safely & efficiently.

Common sense should prevail



E.GRUBEN'S TRANSPORT LTD.

FLUID TRANSFER GUIDELINES

Many spills occur during routine fueling, pumping, and other fluid transfer operations. Most of these spills can be avoided by paying attention and taking simple precautions. EGT has developed field-wide fluid transfer guidelines, which are summarized below.

- **Do not operate equipment unless trained by a competent person.**
- **Check all vehicles and equipment. If a leak is apparent, or there are other obvious problems with the equipment, stop the job and have repairs done. Surface liners or drip pans may be used to contain leaks for a short time during critical operations; however, liners are not an acceptable substitute for maintenance.**
- **Park vehicles and equipment away from water bodies, tundra, and wildlife habitat. Do not park on the edges of the pad.**
- **Position equipment so that valves, piping, tanks, etc., are protected from damage by other vehicles or equipment.**
- **Verify that adequate surface liners and absorbents are on hand.**
- **Make sure all equipment is properly grounded.**
- **Inspect hoses, connections, valves, etc., before starting any fluid transfers. Be sure that valves are in proper position and each connection is tightened properly.**
- **Before starting, check all tank and container levels, valves, and vents to prevent overfilling or accidental releases.**
- **Surface liners or drip pans are required under all potential spill points.**
- **Maintain a constant line-of sight with critical components throughout fluid transfer procedure. Be prepared to stop the transfer immediately if you notice any leaks. Do not attempt to fix a leak while fluid is being transferred. Never leave fluid transfer operations unattended. After transfer is complete, continue to take precautions while breaking connections. When finished, check the area for spills. Report all spills immediately to your supervisor and the 24-hour Spill Report Line (867) 920-8130.**

This Job procedure is to be utilized as a guide only. Worksite practices and/or worksite conditions may necessitate change to the content, or order, of task steps in order to complete the job safely & efficiently. Common sense should prevail .

