

1831



Environment Canada Environnement Canada

Environmental Protection Operations
Prairie and Northern
5019 52nd Street, 4th Floor
P.O. Box 2310
Yellowknife, NT, X1A 2P7

March 4, 2011



Our File No.: 4709 001 046 002
Your File No.: N7L1-1831

Véronique D'Amours Gauthier
Science and Regulatory Officer
NWT Water Board
P.O Box 1326
Yellowknife, NT, X1A 2N9

Via Email at info@nwtwb.com

RE: N7L1-1831 Water License – Unipkat I-22 Sump Remediation Project – Shell Canada Ltd. – Comments on Waste Management Plan 2011

Dear Ms. Gauthier,

Environment Canada (EC) has reviewed the Unipkat I-22 Waste Management Plan 2011 (January 25, 2011) provided by Hazco Environmental Services on behalf of Shell Canada Ltd. The following specialist advice is provided pursuant to EC's mandated responsibilities arising from the *Canadian Environmental Protection Act (CEPA)*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act (SARA)*.

General:

1. All mitigation measures identified by the Proponent, and the additional measures suggested herein, should be strictly adhered to in conducting project activities. This will require awareness on the part of the Proponents' representatives (including contractors) conducting operations in the field. EC recommends that all field operations staff be made aware of the Proponents' commitments to these mitigation measures and provided with appropriate advice / training on how to implement these measures.

Fuel / Spill Contingency

The following comments are on the Spill Contingency Plan (Unipkat I-22), which was included in the Waste Management Plan 2011 (page 21-38).

2. Copies of the spill plan must be made readily available on site and posted where crew members have access to it, and at each fuel cache and refuelling station. All staff should be familiar with operational procedures in the event of a spill and be instructed regarding these spill / clean-up procedures. The Spill Contingency Plan should
 - assign responsibilities to company staff and/or contractors and outline a clear path of response;
 - provide a list of agencies / persons to be contacted in the event of a spill including their phone numbers, etc. Note that EC will be notified through the NWT 24-hour Spill Line process. The Proponent should review their contact list and update accordingly;
 - maintain and update as needed a list and indicate location(s), both on and off site, of equipment available to be used in the event of a spill;

Canada

- Kitchen waste and general refuse – Kitchen waste and general refuse will be stored on site in a badger bin to prevent odours from attracting wildlife from getting into garbage. The badger bins will be later removed and disposed of at the Town of Inuvik landfill.
- Hazardous waste – There is not expected to be any hazardous waste generated from the camp operations. If a hazardous waste is identified at the camp it would be packaged in the appropriate container for waste and disposed of at an approved facility (page 15 of the Waste Management Plan 2011).

Wildlife

5. EC recommends that food, domestic wastes, and petroleum-based chemicals (e.g., greases, gasoline, glycol-based antifreeze) be made inaccessible to wildlife at all times. Such items can attract predators of migratory birds such as foxes, ravens, gulls, and bears. Although these animals may initially be attracted to the novel food sources, they often will also eat eggs and young birds in the area. These predators can have significant negative effects on the local bird populations.
6. Section 5.1 of the *Migratory Birds Convention Act* prohibits persons from depositing substances harmful to migratory birds in waters or areas frequented by migratory birds or in a place from which the substance may enter such waters or such an area.
7. The following comments are pursuant to the SARA, which came into full effect on June 1, 2004. Section 79 (2) of SARA, states that during an assessment of effects of a project, the adverse effects of the project on listed wildlife species and its critical habitat must be identified, that measures are taken to avoid or lessen those effects, and that the effects need to be monitored. This section applies to all species listed on Schedule 1 of SARA. However, as a matter of best practice, EC suggests that species on other Schedules of SARA and under consideration for listing on SARA, including those designated as at risk by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC), be considered during an environmental assessment in a similar manner.

EC recommends:

- Species at Risk that could be encountered or affected by the project should be identified and any potential adverse effects of the project to the species, its habitat, and/or its residence noted. All direct, indirect, and cumulative effects should be considered. Refer to species status reports and other information on the Species at Risk registry at www.sararegistry.gc.ca for information on specific species as well as the booklet "Species at Risk in the Northwest Territories" (2010 Edition) available at [http://www.enr.gov.nt.ca/live/pages/wpPages/Species at Risk.aspx](http://www.enr.gov.nt.ca/live/pages/wpPages/Species%20at%20Risk.aspx).
- If Species at Risk are encountered or affected, the primary mitigation measure should be avoidance. The Proponent should avoid contact with or disturbance to each species, its habitat and/or its residence.
- Monitoring should be undertaken by the Proponent to determine the effectiveness of mitigation and/or identify where further mitigation is required. As a minimum, this monitoring should include recording the locations and dates of any observations of Species at Risk, behaviour or actions taken by the animals when project activities were encountered, and any actions taken by the Proponent to avoid contact or disturbance to the species, its habitat, and/or its residence. This information should

1831

Environment Division
Environmental Assessment and Monitoring
Environment and Natural Resources
PO BOX 1320
Yellowknife NT X1A 2L9
Telephone (867) 920-6591
Fax (867) 873-4021



Northwest Territories Environment and Natural Resources

March 7, 2011

Veronique D'Amours Gauthier
Science and Regulatory Officer
NWT Water Board
PO Box 2531
Inuvik, NT
X0E 0T0



Dear Ms. D'Amours Gauthier:

**Re: Shell Canada Energy Ltd.
N7L1-1831
Unipkat I-22 Sump Remediation Project
Draft Terms and Conditions
Waste Management Plan
Request for Comments**

The Department of Environment and Natural Resources (ENR) has reviewed the above application based on its mandated responsibilities under the *Environmental Protection Act*, the *Forest Management Act*, the *Forest Protection Act* and the *Wildlife Act* and provides the following comments and recommendations for consideration.

- All industrial proponents must consult with community governments prior to depositing waste at an approved Solid Waste Disposal Facility.
- All permitting and registration requirements should be complied with as per Board and Government Legislation and requirements.

Comments and recommendations were provided by ENR technical experts in the Inuvik Region and were coordinated and collated by the Environmental Assessment and Monitoring Section (EAM).

If you have any questions or concerns, please do not hesitate to contact me at 920-6591 or email at patrick_clancy@gov.nt.ca.

Sincerely,



Environmental Regulatory Analyst
Environmental Assessment and Monitoring
Department of Environment and Natural Resources