

Review Comment Table

Board:	GLWB
Review Item:	GNWT Department of Infrastructure - LUP Application - Geotechnical Drilling Inuvik Hospital (G18S006)
File(s):	G18S006
Proponent:	GNWT - INF
Document(s):	Land Use Permit Application Form (342 KB) LUP Application Appendix (1321 KB) Draft Land Use Permit (727 KB)
Item For Review Distributed On:	
Reviewer Comments Due By:	Jan 16, 2019
Proponent Responses Due By:	Jan 23, 2019
Item Description:	<p>The Government of the Northwest Territories (GNWT), Department of Infrastructure (INF) has submitted to the Gwich'in Land and Water Board an application for a Type "A" Land Use Permit, for the purpose of geotechnical drilling at Inuvik NT. The applicant requests a term of two years, with work to begin in February 2019.</p> <p>Reviewers are invited to submit questions, comments, and recommendations using the Online Review System (ORS) by the review comment deadline specified below. Please provide comments and recommendations on the:</p> <ul style="list-style-type: none"> • Application • Spill Contingency Plan; • Engagement Plan; • Draft Land Use Permit (please clearly indicate which condition you are commenting on). <p>Please note that the draft Permit has been developed using the MVLWB's current Standard Land Use Permit Conditions Template. The purpose of this draft Permit is to allow parties to comment on Board staff's suggested conditions. These draft materials are not intended to limit in any way the scope of parties' comments. The Board is</p>

	not bound by the contents of the draft Permit and will make its decision at the close of the proceeding on the basis of all the evidence and arguments filed by all parties.
General Reviewer Information:	The Board encourages reviewers to submit questions and/or recommendations through the Online Review System, no later than Wednesday January 16, 2019. Note that all documents that have been uploaded to this review are also available on our public registry. If you have questions or require assistance with the ORS, please contact Board staff identified below.
Contact Information:	AlecSandra Macdonald 867-777-4954

Comment Summary

Environment and Climate Change Canada: Richard Bingley				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
2	General File	Comment (doc) Environment and Climate Change Canada Coverletter Recommendation		
1	Spill Response - Application Appendix B, Section 6.2.2 Spills on snow	Comment ECCC notes that there are two listed types of spill response planned, one for spills on land (section 6.2.1), the other for spills on snow. However only the spill on land response is outlined. Recommendation ECCC recommends the proponent update the spill response to include the spill on snow response outline.	Jan 22: January 18: Noted, INF will update plan.	
GNWT - ENR: Central Email GNWT				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
8	General File	Comment (doc) ENR Letter with Comments and Recommendations Recommendation		
1	Topic 1: Fuel Storage and Spill	Comment ENR acknowledges the proponent's Spill Contingency Plan (SCP). In addition, the Proponent should also follow best practices for fuel storage and spill containment during project	Jan 22: January 18: INF notes that the Project will follow the submitted Spill Contingency Plan (SCP) to	

	Contingency Planning and Reporting and Missing and Out of Date Information	<p>activities which may include the following recommendations.</p> <p>Recommendation 1) To assist in spill contingency planning, information is provided in EPA Spill Contingency Planning and Reporting Regulations found here: https://www.justice.gov.nt.ca/en/files/legislation/environmental-protection/environmental-protection.r2.pdf If clarification or further information is needed please contact the Mike Martin, Hazardous Substance Specialist, Environment Division, ENR directly to aid in the development of the Plan</p>	mitigate and manage any spills. Additionally, fuel storage and spill containment will follow best practices.	
2	None	<p>Comment None</p> <p>Recommendation 2) In accordance with the Spill Contingency Planning and Reporting Regulations Section 10, all spills in accordance with Schedule B must be reported immediately to the 24-hour Spill Report Line (867) 920-8130.</p>	Jan 22: January 18: As noted within the SCP, all spills will be immediately reported to the Spill Report Line.	
3	None	<p>Comment None</p> <p>Recommendation 3) With respect to the Environmental Protection Act Section 5 (1b) all spills, regardless of amount, must be cleaned up, and contaminated materials disposed of at an approved facility, or in an approved manner. Additionally, as indicated in Section 5(1c) all reasonable efforts must be made to notify any parties affected or potentially affected by the spill.</p>	Jan 22: January 18: INF notes that the Project will follow the submitted Spill Contingency Plan (SCP) to mitigate and manage any spills. Additionally, fuel storage and spill containment will follow best practices.	
4	None	<p>Comment None</p> <p>Recommendation 4) Fuel storage areas should be greater than 100m distance from the ordinary high water mark of a water body and not located in a drainage channel.</p>	Jan 22: January 18: The project site is not located near any water sources. Fuel storage areas will be greater than 100m from high water mark of any water body and not located in drainage channel.	
5	None	<p>Comment None</p> <p>Recommendation 5) All fuel or storage vessels containing hazardous substances left for extended periods of time (including overnight in vehicles), should be stationed in an area that contains sufficient secondary containment (i.e. Drip pans, lined bermed areas, double walled enviro-tanks etc.).</p>	Jan 22: January 18: INF will adhere to recommendation.	

6	None	<p>Comment None</p> <p>Recommendation 6) It is recommended spill kits be provided. Personnel should be trained to ensure that in the event of a spill it is contained and remediated appropriately to industry-accepted best practices and regulatory approval. In case refuelling takes place near water, in water spill planning should be considered to prevent inadvertent releases.</p>	<p>Jan 22: January 18: The project site is not located near any water sources. Fuel storage areas will be greater than 100m from high water mark of any water body and not located in drainage channel.</p>	
7	None	<p>Comment None</p> <p>Recommendation 7) ENR recommends, for the operator's convenience and increased environmental protection, that all heavy equipment and refuelling vehicles carry portable spill kits that include items such as absorbent pads, containment booms, and spill pool catchment receptacles. Readily available and fully stocked spill kits can effectively mitigate potential spills.</p>	<p>Jan 22: January 18: INF will adhere to recommendation.</p>	

Nihtat Gwich'in Council - DGO: Jozef Carnogursky

ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
1	Nihtat Gwich'in Council Copmments (via email)	<p>Comment We have no issues or concerns with this application.</p> <p>Recommendation n/a</p>		