

MVLWB Registry

From: Gary Jaeb <gary@truenorthsafaris.com>
Sent: Tuesday, December 30, 2014 8:19 PM
To: Miki
Cc: Angela Plautz; permits@mvlwb.com
Subject: Re: More information on expectations for Engagement Plans and Spill Contingency Plans and information on other options

Thank you for the information
 I will keep you informed and may need more help and info
 Gary

From: [Miki](#)
Sent: Tuesday, December 30, 2014 3:47 PM
To: gary@truenorthsafaris.com
Cc: [Angela Plautz](#) ; permits@mvlwb.com
Subject: More information on expectations for Engagement Plans and Spill Contingency Plans and information on other options

Hi Gary,

As we discussed on the phone earlier this month, the Spill Contingency Plan that you resubmitted via Clint's email on December 5th is unchanged from the last version, and therefore will not be considered revised and will not be sent out for review.

I wanted to provide you with more information and resources to give you an idea of the Board's expectations for Engagement Plans and Spill Contingency Plans and help you revise/write your plans. Also below I have information on other options for your Land Use Permit including suspension and discontinuance.

Engagement Plan

Here is an example of a basic Engagement Plan [MV2014F0007 - Tli Cho LandTran \(winter road\)](#) . The template that I sent you on Dec. 15, (also attached to this email) can be filled in and submitted as your Engagement Plan.

Spill Contingency Plan (SCP)

For an example of the recommended way to structure a SCP, please refer to the attached file "SCP example table of contents", which is taken from the [Guidelines for Spill Contingency Planning](#)

I have listed the items missing from your SCP below (these were outlined in the Board's [Sept. 24, 2013 issuance letter](#)), and I have included information to help you wherever possible.

- a. Spill Report forms
 - Include in the SCP a copy of the form, which can be obtained at http://www.enr.gov.nt.ca/sites/default/files/ntnu_spill_report_form.pdf
- b. Material Safety Data Sheets (MSDS) for all known fuels, lubricants, and chemicals.
 - There are a number of websites that offer free MSDS sheets for download, for example: <http://www.msdsxchange.com/english/index.cfm>
 - Include a copy of MSDS sheet for all fuels, lubricants, and chemicals that are stored onsite

- c. A complete list of all motorized equipment on-site and where it is stored;
- d. A list of the spill response and clean-up equipment available to implement the Plan, including location and quantity (where applicable);
 - See Appendix B, section 4.i of the [Guidelines](#) for an example of what is expected
- e. More detailed information on procedures for containing and cleaning up spills. The procedures should identify the containment and clean up strategies for various spill scenarios, with detailed instructions for how to achieve the strategies. Procedures will vary depending on whether the spill is on land, water, snow, or on or under ice. Criteria and procedures should be provided for scenarios which might require ignition and burning of oil or fuel spills.
 - See Appendix B, section 3.iii of the [Guidelines](#) , especially p. 22-23 for examples of containment and clean up strategies for various spill scenarios that could be adapted directly for use in your SCP.
- f. More detailed information on procedures for transferring, storing, and managing spill-related wastes. If materials are to be disposed on or off-site, the plan should describe the disposal method and approved location as well as criteria for the decision regarding the disposal location. The Proponent should identify any regulatory steps that must be taken to acquire regulatory approval for the waste management options outlined in the plan.
 - See Appendix B, section 3.iii of the [Guidelines](#) , especially p. 23 for an example of procedures for transferring, storing, and managing spill-related wastes that could be adapted directly for use in your SCP.
- g. Measures taken to avoid damage to buried propane lines, including any signage or indications of their location.
- h. Measures taken to meet the requirements of the LUP condition in section 26(1)(m) that states: The Permittee shall ensure that all fuel caches containing 20 or more Fuel Storage Containers have adequate Secondary Containment.
 - See Appendix B, section 1.x of the [Guidelines](#) (p.17) for an example of a description of secondary containment.
- i. Spill contingency planning map that shows all fuel storage areas, fuel transfer areas, location of spill response equipment and kits, legible labels for features, north arrow and indication of scale, contour lines and other topographical features.
 - See Figure 2 of Appendix B of the [Guidelines](#) (p.15) for an example of an appropriate map.

Finally, I have been meaning to respond to questions you had regarding other options including suspension of the Land Use Permit, or discontinuance.

- Suspension: Section 35 of the [Mackenzie Valley Land Use Regulations](#) (Regs) outlines the circumstances under which a suspension may occur. The Board may suspend a permit in 4 situations (see 35.1.a-d of the Regs); before suspending a permit, the Permittee must have an opportunity to be heard by the Board. However, a suspension does not relieve the Permittee from any obligations arising from the Permit (i.e. you would still need to submit a revised SCP and Engagement Plan as per conditions 35 and 37 of your Permit).
- Discontinuance: Section 37 of the [Regs](#) outlines the circumstances under which a Permittee could give notice of a discontinuance. As you are currently required to hold a Permit to operate, discontinuing your Permit would mean that operations could not continue.

Please do not hesitate to contact me if you have any questions. I am happy to assist you as you work to revise the Spill Contingency Plan and write the Engagement Plan. I will be back in the office Jan. 5, 2015. Best wishes for a happy and healthy 2015!

Miki

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Please note: All correspondence to the Board, including emails, letters, faxes and attachments are public documents and may be posted to the Public Registry.



Appendix B

Example

Spill Contingency Plan



Spill Contingency Plan

Company Unknown

Lake Invisible Location,
Northwest Territories

Prepared by:

John Fiction, EHS Specialist

Approved by:

Jane Leader, EHS Manager

Table of Contents

1) Introduction and Project Details

- i) Company name, site name, site location and mailing address
- ii) Effective date of spill contingency plans
- iii) Last revisions to spill contingency plans
- iv) Distribution list
- v) Purpose and scope
- vi) Company environmental policy
- vii) Project description
- viii) Site description
- ix) List of hazardous materials on-site
 - amount normally stored and storage capacity
 - types and number of storage containers
 - storage location
 - MSDS's for each material (in Appendices)
- x) Existing preventative measures e.g. secondary containment, fuel handling
- xi) Additional copies – how to obtain
- xii) Process for staff response to media and public enquiries

2) Response Organization

- i) Flow chart of response organization

3) Action Plan

- i) Potential spill sizes and sources for each hazardous material on site
- ii) Potential environmental impacts of spill (include worst case scenario)
- iii) Procedures (include alternative action in case of impending environmental conditions):
 - A. Procedures for initial actions
 - B. Spill reporting procedures
 - C. Procedures for containing and controlling the spill e.g. on land, water, snow, ice, etc.
 - D. Procedures for transferring, storing, and managing spill-related wastes
 - E. Procedures for restoring affected areas

4) Resource Inventory – describe all resources available for responding to spills

- i) On-site resources e.g. spill kits, booms, sorbent materials, earth moving equipment
- ii) Off-site resources e.g. contact numbers for deployment and time estimate

5) Training Program

- i) Outline of training program
- ii) Training schedule and record keeping

Figures

Figure 1: Site location map (1:50,000 scale)

Figure 2: Sketch of site plan including buildings, roads, water bodies, hazardous material locations, spill kit locations and direction of flow

Figure 3: Flowchart of response organization

Tables

Table 1: List of hazardous materials stored on-site, type and number of storage containers, the normal and maximum storage quantities and storage locations

Table 2: List of hazardous materials, potential discharge events and volumes and direction of flow

Appendices

Appendix B-1: Material Safety Data Sheets (MSDS) for hazardous materials stored on site

Appendix B-2: NWT Spill Report Form (most recent approved version)

Appendix B-3: Immediately Reportable Spill Quantities

Engagement Plan Template¹

Name of Proponent: _____

Name of Affected Party: _____

<p>When will you be engaging?</p> <p><i>What is the trigger for engagement? Triggers may be regulatory (e.g., renewals, amendments, assignments) and/or project-based (e.g., determining drill locations, changes in project design, updates to a particular plan, etc.</i></p>	<p>What is the purpose for engaging?</p> <p><i>In relation to the trigger, what will you be discussing (e.g., updates to design or plans, etc.)?</i></p>	<p>Who will be engaged at each of these stages?</p> <p><i>The people engaged at each stage may vary depending on what is being discussed.</i></p>	<p>How will you engage?</p> <p><i>Which engagement methods will be used? See Appendix A for best practices (e.g., written notification, face-to-face meetings, community public meeting)</i></p>

Signature of Proponent (representative): _____

Signature of Affected Party (representative):² _____

¹ One engagement plan must be completed for each affected party.

² These signatures represent agreement on the contents of the log and record, but do not necessarily imply that the parties agree on the topics that were discussed.