



Environmental Protection Operations Directorate  
Prairie & Northern Region  
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P.O. Box 2310  
Yellowknife, NT X1A 2P7

ECCC File: 6100 000 185 /002  
NWB File: 2BE-ABP----

December 15, 2017

Via email to: [licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca)

Richard Dwyer  
Licence Administrator  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, NU X0B 1J0

Dear Mr. Dwyer:

**RE: 2BE-ABP---- –Transitions Metals Corporation – Arcadia Bay Project – Type B Water Licence Renewal**

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the Type B water licence 2BE-ABP---- application and is submitting the following comments via email as requested by the NWB. ECCC's specialist advice is provided based on our mandate, in the context of the *Canadian Environmental Protection Act*, the pollution prevention provisions of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

1. Incineration, Environmental Management Plan

On p.13 on their Environmental Management Plan, under Section 6 Waste Management Planning, Transition Metals Corporation (the Proponent) states that "Alternatively to outhouses, a pacto system will be used and waste incinerated".

Incineration of black water and sludge is discouraged unless the incinerator is specifically designed to handle this waste and the manufacturer's operating instructions are strictly followed to achieve appropriate combustion. On p.11 of the Environmental Management Plan, in the section on Air and Noise Quality, the Proponent states that it will use an "Environment Canada approved batch waste, controlled air, dual chamber incinerator [...]", but no specifications on the incinerator are provided. These specifications cannot be found in screening application. It is

thus unclear to ECCC if the on-site incinerator will be designed to handle blackwater from the facto toilets.

ECCC recommends the Proponent clarify that the incineration equipment chosen is specifically designed to handle incineration of blackwater.

Should you require further information, please do not hesitate to contact me at (867) 669-4746 or [Gabriel.Bernard-Lacaille@canada.ca](mailto:Gabriel.Bernard-Lacaille@canada.ca).

Sincerely,

*[original signed by]*

Gabriel Bernard-Lacaille  
Environmental Assessment Coordinator

cc: Melissa Pinto, Senior Environmental Assessment Coordinator  
Georgina Williston, Head, Environmental Assessment North (NT and NU)  
Thomas Hart, Transition Metals Corporation