



Environment and  
Climate Change Canada

Environnement et  
Changement climatique Canada

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

July 24, 2017

ECCC File: 6100 000 183/002  
NWB File: 2BE-KUU----

Cynthia Ene  
Technical Advisor  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, NU X0B 1J0

via email: [lincensing@nwb-oen.ca](mailto:lincensing@nwb-oen.ca)

**RE: 2BE-KUU---- – NxGold Ltd. – Kuulu Project – Type B Water Licence**

Attention: Cynthia Ene

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board regarding the above-mentioned water licence application and is submitting a comment via email. 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*.

The following comment is provided:

The Water Licence Application states that sewage from Pacto toilets will be incinerated and ash will be backhauled for disposal offsite. 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. It is unclear from the Water Licence Application if the incinerator that will be used is specifically designed to handle the incineration of sewage.

ECCC recommends that the Proponent clarify if the incineration equipment chosen is specifically designed to handle sewage. Should the Proponent require additional information ECCC has developed a technical document for batch waste incineration that is available at the following link: <https://www.ec.gc.ca/gdd-mw/default.asp?lang=En&n=F53EDE13-1>

Should you require further information, please do not hesitate to contact me at (867)669-4732 or [Emily.Nichol@canada.ca](mailto:Emily.Nichol@canada.ca)

Sincerely,

A handwritten signature in dark ink, reading "Emily Nichol". The signature is written in a cursive, flowing style.

Emily Nichol  
Environmental Assessment Coordinator

cc: Bradley Summerfield, Senior Environmental Assessment Coordinator  
Loretta Ransom, A/Head, Environmental Assessment North (NT and NU),  
PNR-EPOD