

Environmental Protection Operations Directorate  
Prairie & Northern Region  
5019 52<sup>nd</sup> Street, 4<sup>th</sup> Floor  
P.O. Box 2310  
Yellowknife, NT X1A 2P7

ECCC File: 6100 000 194/002  
NIRB File: 2BE-SKG----



February 23, 2023

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

Richard Dwyer  
Manager of Licensing  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, NU X0B 1J0

Dear Richard Dwyer:

**RE: 2BE-SKG---- – Viridis Mining and Minerals – South Kitikmeot Gold Project – Type B Water Licence Application**

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above-mentioned application.

ECCC is providing technical, science-based information and knowledge based on our mandate pursuant to the *Canadian Environmental Protection Act* and the pollution prevention provisions of the *Fisheries Act*. These comments are intended to inform the assessment of this project's potential effects in the receiving environment and on valued ecosystem components. Any comments received from ECCC in this context does not relieve the proponent of its obligations to respect all applicable federal legislation.

The following comments are provided:

**1. Incinerator Emissions**

Reference(s)

- Waste Management Plan, November 2022

Comment

The Proponent may incinerate combustible non-mineral waste. The burning of waste products releases numerous contaminants to the air (e.g. polycyclic aromatic hydrocarbons, heavy metals, chlorinated organics such as dioxins and furans, etc.), which can result in harmful impacts to human and wildlife health. Therefore, burning should only be considered as a waste disposal method after all other alternatives have been explored.



ECCC has developed a Technical Document for Batch Waste Incineration which provides guidance on the incineration of combustibles and burnable debris, for incinerators with capacities ranging from 50 to 3000 kg of waste per batch, with the intent of achieving the Canada-Wide Standards for Dioxins and Furans, as well as Mercury. The document provides information on appropriate incineration technologies, best management and operational practices, monitoring and reporting, and can be found at the following web link: <https://ec.gc.ca/gdd-mw/default.asp?lang=En&n=F53EDE13-1>

ECCC Recommendation(s)

ECCC recommends that the Proponent follow the guidelines in the Technical Document for Batch Waste Incineration, where appropriate. This will ensure diligent operation and maintenance of the incineration device and ensures appropriate training is provided to the personnel operating and maintaining the incinerator.

If you need more information, please contact Melissa Pinto at (867) 445-5384 or [Melissa.Pinto@ec.gc.ca](mailto:Melissa.Pinto@ec.gc.ca).

Sincerely,

*[original signed by]*

Melissa Pinto  
Senior Environmental Assessment Officer

cc: Jody Small, Acting Head, Environmental Assessment North (NT and NU)