



CIRNAC Comments to NIRB Re: Notice of Screening for Qikiqtaaluk Environmental Inc.'s "Installation of an Incinerator" Project Proposal



Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence
15XN051
Our file - Notre référence
CIDMS # 1287489

August 10, 2020

Mia Otokiak
Junior Technical Advisor
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0
Via email: info@nirb.ca

Dear Mia Otokiak,

Re: Notice of Screening and Comment request for Qikiqtaaluk Environmental Inc.'s "Installation of an Incinerator" Project Proposal

On July 20, 2020, the Nunavut Impact Review Board (NIRB) invited parties to comment on Qikiqtaaluk Environmental Inc.'s "Installation of an Incinerator" Project Proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) has reviewed the Project Proposal and supporting documents and offers the responses below as it pertains to the NIRB's request:

Whether the Project is of a type where the potential adverse effects are highly predictable and mitigable with known technology, (please provide any recommended mitigation measures);

CIRNAC is of the view that the potential impacts of the proposed Project can be mitigated with known practices or technology.

CIRNAC recommends that the Proponent adopt the following additional common practices to mitigate potential adverse effects from project activities:

- Fuel and other hazardous material should not be stored on the surface ice of lakes or streams;
- All fuel and other hazardous materials should be stored a minimum of thirty-one (31) metres away from the high water mark of any water body and in such a manner as to prevent their release into the environment;
- Re-fuelling of all equipment should occur a minimum of thirty-one (31) metres away from the high water mark of any water body;



- Secondary containment or a surface liner should be used when storing barrelled fuel and chemicals at all locations;
- Drip pans or other equivalent device should be used when refueling equipment. Secondary containment or a surface liner (e.g., self-supporting instaberms and fold-a-tanks) to be used at all refueling stations;
- Spill response equipment and clean-up materials (e.g., shovels, pumps, barrels, drip pans, and absorbents) should be readily available during any transfer of fuel or hazardous substances, at all fuel storage sites and maintenance areas; and
- All personnel are to be properly trained in fuel and hazardous waste handling procedures, as well as spill response procedures.

Any matter of importance to the Party related to the project proposal;

Potential Environmental Impact Matrix

The Proponent is proposing to store up to 1000L of diesel on site for use with the incinerator. The stored diesel will be indoors, however there is still potential for release into the environment, which is not captured under the Identification of Potential Environmental Impact matrix of the NIRB application.

Further, incinerators have potential to contaminate the environment with incomplete combustion or improper use of the incinerator; this is also not captured as a potential impact in the Identification of Potential Environmental Impact matrix.

CIRNAC recommends that the Proponent update the Identification of Potential Environmental Impact matrix to reflect the potential impacts from stored fuel and the potential impacts from the incinerator.

Potential positive impacts to residents of Iqaluit through employment and training of local Inuit beneficiaries

CIRNAC recommends the Proponent prioritize the hiring and training of local Inuit beneficiaries to maintain and operate the biomedical waste incinerator. Such efforts will allow for benefits to be realized by residents of Iqaluit and the local Inuit population.

Consultation with interested parties

CIRNAC recommends the Proponent maintain open communication with the City of Iqaluit, whose land the project is situated on, nearby land administrators (i.e., the Government of Nunavut and the Qikiqtani Inuit Association), and community members on project activities. Monitoring results (e.g., air quality), waste management practices, and compliance with permits, legislation, and relevant guidelines should be communicated with these interested parties.



CIRNAC appreciates the opportunity to provide comments and looks forward to working with the NIRB and the Proponent throughout any further review phases related to this project. Should you have any questions, please contact Richard Bingley at (867) 975-4556 or by e-mail at Richard.Bingley2@Canada.ca.

Sincerely,



Felexce Ngwa
Manager, Impact Assessment

