

COR-2024-3349

AUG 23 2024

Reg. # 2316

Paul Dalley  
Paul Dalley Holdings Inc.  
P.O. Box 220  
Gander, NL A1V 1W6  
E-mail: [pdalley0210@gmail.com](mailto:pdalley0210@gmail.com)

Dear Paul Dalley:

**RE: Lewisporte Biomedical Waste Incineration (the Project)**

Your proposal has been reviewed by an interdepartmental environmental assessment screening committee and an opportunity to comment has been provided to the public required by Part X of the Newfoundland and Labrador **Environmental Protection Act**, SNL 2002, cE-14.2. Upon consideration of the comments received, please be advised that an Environmental Impact Statement (EIS) is required.

Additional project information is required to address, at a minimum, the following issues:

- Project details and rationale, including, but not limited to:
  - Information on whether the proposed incineration equipment has been used in any other jurisdictions of Canada and justification for proposing this technology versus any other in use.
  - Detailed site plan survey, including distances to nearest receptors (environmental and socio-economic).
  - Description of facility construction materials.
- Waste management, including, but not limited to:
  - Submission of a required Waste Management Plan (WMP) covering the construction and operation phases of the undertaking.
  - Expected composition of the waste.
  - Clarification about whether the proposed facility will be collecting wastes from all regions of Newfoundland and Labrador, including Labrador.
  - Volume and composition of ash requiring regular disposal at an appropriate approved facility.

- Incinerator technology and/or incineration process, including, but not limited to:
  - Whether the incinerator would be a continuous feed or batch operation.
  - Additional details on the combustion time in the primary chamber.
  - Details on how waste would be segregated during incineration.
  - Preventive maintenance/measures (for example, how will the incinerator maintain efficiency and ensure safety functions).
  - Details on how the equipment will be monitored on a daily, weekly, and monthly basis.
- Air emissions, including, but not limited to:
  - Stack emission testing to be performed by an accredited third party to validate the emission claims.
  - A contingency plan in the event the unit goes down for an extended period of time, including a forced shutdown for failing an emission test.
  - Confirmatory test results ascertaining that the proposed incinerator meets the standards stated in the registration document as well as the Air Pollution Control Regulations.
- Wastewater effluent, including, but not limited to:
  - Volume and characterization of wastewater to be generated.
  - Quality assurance measures.
  - An alternative plan for dealing with the wastewater if it cannot be discharged into the town's sanitary drain/sewer system.
- An emergency response plan following Provincial and Federal legislation and guidelines.
- Community consultation, including, but not limited to:
  - A plan for odor tracking and projections.
  - Community consultation efforts and ongoing engagement plan.
  - Municipal consultation.

An Environmental Assessment Committee will be appointed for the purpose of providing you with technical and scientific advice regarding the preparation of the EIS. As per the legislative requirements, within 120 days of this letter you will be issued guidelines for the completion of the EIS.

In accordance with the **Environmental Protection Act**, the Project activities may not proceed until the undertaking is released from environmental assessment. Your undertaking may be subject to environmental assessment fees as described in the Environmental Assessment Fees Policy located at [Fees for Environmental Assessment - Environment and Climate Change \(gov.nl.ca\)](http://gov.nl.ca/EnvironmentandClimateChange). Please review the fees policy and submit



a detailed capital cost estimate for the undertaking to [EAProjectComments@gov.nl.ca](mailto:EAProjectComments@gov.nl.ca) within two weeks of receiving this letter.

If you have any questions, please contact Joanne Sweeney, Director of the Environmental Assessment Division, at (709) 729-0673 or via e-mail at [joannesweeney@gov.nl.ca](mailto:joannesweeney@gov.nl.ca).

Sincerely,

A handwritten signature in blue ink, appearing to read "Lisa Dempster", written over a horizontal line.

**HON. LISA DEMPSTER, MHA**

District of Cartwright – L'Anse au Clair  
Minister

Enclosures

Cc: Hon. Derek Bennett, MHA – District of Lewisporte - Twillingate