

AECOM Canada Ltd. 101-18817 Stony Plain Road NW Edmonton AB T5S 0C2 Canada

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Date June 16, 2017 Your Reference

60515379 (600/13)

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

Our Reference 60515379 (600)

Dear Ms. Ikkutisluk:

Water Board Licence No. 1BR-KEI722 Amendment Request – CAM-E Environmental Site Remediation – Waste Burn Request

On behalf of Indigenous and Northern Affairs Canada (INAC), we would like to request an amendment to the Water License No. 1BR-KEI722 issued for the CAM-E DEW Line Environmental Remediation Project. The request is to amend the sections detailed below:

## **Waste Disposal**

Under Part D: Conditions Applying to Waste Disposal, item 2, "The Licensee is authorized to disposal of all acceptable food waste, paper waste and untreated wood products in an incinerator."

There is a significant amount of untreated and unpainted wood that would be suitable to burn as part of the remediation plan. The above condition authorizes burning of this wood in an incinerator however, we would like to request permission to burn the untreated and unpainted wood as described in the contractor's burn plan (appended). In general, the burn plan involves segregation of the wood, burning untreated / unpainted wood in a container suitable to contain the ash and sampling the ash to determine disposal requirements.

The reasons we are requesting permission to burn untreated and unpainted wood are as follows:

- An incinerator (forced-air, fuel-fired) is currently approved for burning combustible wastes generated on site. The incinerator is not designed to burn large pieces of wood. Also, the burning of diesel fuel to incinerate the wood is unnecessary. Therefore, burning the wood outside of an incinerator would allow large pieces to be burned and eliminate the unnecessary burning of fossil fuels.
- Wood placed into the on-site non-hazardous landfill will eventually degrade, which could potentially
  impact the structural integrity of the landfill. Therefore, avoiding the disposal of wood wastes within the
  landfill will reduce potential adverse impacts to the landfill integrity.
- Shipping the wood off site is a costly option and one that should be avoided.

Burning the wood in a controlled manner, following the burn plan proposed by the contractor, is not expected to have permanent environmental impacts to the area.



Should you have questions or comments, please contact the undersigned at your convenience.

Sincerely,

Greg Wright, M.Sc. Project Manager AECOM Canada Ltd.

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Roland Merkosky P. Eng. Project Principal/Technical Lead

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Attachment 1 – Request for a Burning Permit at CAM-E, Keith Bay



May 12th, 2017

to AECOM 18817 Stony Plain Road NW Edmonton, Alberta T5S 0C2

Attention: Greg Wright

Reference: Request for a burning permit, CAM-E Remediation Project, Keith Bay, NU

Mr. Wright,

We would like to apply for a burning permit regarding the abovementioned project in order burn the unpainted scrap wood instead of burying it into the landfill. You will find hereunder the methodology that we will follow once the burning permit will been issued:

- Collect the scrap wood on site;
- Segregate painted and treated wood from the piles;
- Burn all unpainted wood within an ash collection system, inside a water-tight metal tray with sides at least 300 mm high. The container will provide a means to protect the ash from wind and water until it is sampled.
- A leachate extraction test (leachable metals) will be conducted to determine the disposal requirements of the ash. The ash meeting the disposal criteria will be placed on site into the Non-Hazardous Waste Landfill or into the Tier II landfill facility, according to the analytical results. The ash that does not meet the disposal criteria will be containerized and shipped off site to an adequate disposal facility.
- Process the painted wood according to the specifications.

Please let me know if additional information is required. Best regards

Prepared by:

François Bourassa, P. Eng.

**Project Manager** 

Kudlik Construction Ltd.