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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

File No.: 1BR-KIV1621 / PART D

August 17, 2017

Charlotte Lamontagne
Director, Contaminated Sites
Indigenous and Northern Affairs Canada
P.O. Box 2200 Iqaluit X0A 0H0

Email: charlotte.lamontagne@aandc.gc.ca

RE: Licence No. 1BR-KIV1621, Type “B”; Request by Indigenous and Northern Affairs Canada for an Authorization to Open-Burn Acceptable Materials at the FOX-D (Kivitoo) Site Remediation Project

Dear Ms. Lamontagne:

The Nunavut Water Board (“NWB”) received on July 25, 2017 a written request (Application) from Indigenous and Northern Affairs Canada (INAC or the Licensee), to carryout controlled, open-burning of acceptable materials (unpainted and/or untreated wood), at the FOX-D (Kivitoo) Site Remediation Project, located in the Qikiqtani Region, Nunavut. Information contained in the application, indicates that the proposed activity will be carried out with the use of galvanized steel containers and overseen by a hazardous waste specialist. Further, the ash and/or residue generated will backhauled to an appropriate facility for disposal.

Following receipt and an internal preliminary review, the NWB distributed the Application on August 3, 2017 for a two-week public review and comment period with the deadline for submissions set for August 11, 2017. Three (3) days after the deadline for comments, a submission was received from Indigenous and Northern Affairs Canada (INAC).

Subsequent to the external review and comment period, the NWB conducted a detailed review of the Licensee’ request in the context of the terms and conditions in Licence No. 1BR-KIV1621 and the requirements under section 12.1(a) and (b) of the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and is satisfied that the proposed activity is unlikely to directly or indirectly impact freshwater bodies. Consequently, the Board has approved, under motion No. 2017-B1-024, INAC’s request to open-burn untreated and unpainted wood materials during the 2017 field period at the FOX-D (Kivitoo) Site Remediation Project.

The Licensee is required to notify INAC's Field Operations Division at least ten (10) days prior to conducting the authorized activity, and the notification must include the following information:

- a. Quantity and details of waste to be burned;
- b. Proposed dates of open-burning event(s);
- c. Protocol to be followed for open-burning; and
- d. Person(s) responsible for carrying out the open-burning event(s).

The NWB notes that the Licensee has committed to implement relevant measures to prevent any potential negative consequences of open-burning activities on the receiving environment. The NWB, however, reminds the Licensee of its obligations to comply with all of the terms and conditions in its Licence as well as all applicable regulations and established guidelines^{1,2,3,4} for open-burning acceptable materials in Nunavut.

The NWB has included, as Appendix A, a summary of additional practices for carrying out the approved activity. The Licensee is encouraged to follow best practices for open-burning as well as those detailed in Appendix A. A report of open-burning event(s) and related clean-up activities, including photos of the site, must be included as part of the respective year's Annual Report under Part B, Item 1 of Licence No. 1BR-KIV1621.

Should you have any questions, please contact the NWB Licensing Department at licensing@nwb-oen.ca.

Yours truly,

Thomas Kabloona
Nunavut Water Board, Chair

Cc: Distribution List – Qikiqtani

¹ Guidelines for the Planning, Design, Operations and Maintenance of Modified Solid Waste Sites in the NWT, Ferguson Simek Clark Engineers & Architects, FSC

² CCME Canada-Wide Standards for Dioxins and Furans: http://www.ccme.ca/assets/pdf/d_and_f_standard_e.pdf

³ EC Technical Document for Batch Waste Incineration: <http://www.ec.gc.ca/gdd-mw/default.asp?lang=En&n=F53EDE13-1>

⁴ GN DOE Environmental Guideline for the Burning and Incineration of Solid Waste: <http://www.gov.nu.ca/env/Open%20burning.pdf>

APPENDIX A – PRACTICES FOR OPEN BURNING

The NWB highlights several key items of this approval for carrying out of the activities, which include:

- a. The Licensee shall follow the Government of Nunavut's policy for the open-burning of segregated wastes, and shall not allow the open-burning of plastics, wood treated with preservatives, electrical wire, Styrofoam, asbestos or painted wood;
- b. Solid wastes that are conditionally suitable for open-burning are paper products, paperboard packaging and untreated wood wastes only;
- c. Wood and other acceptable products shall be kept as dry as possible before and during open-burning;
- d. The size of the burn pile should be minimized, and a "hot burn" maintained to create an efficient burn using consistent/constant feed rates to avoid over-feeding and damping the fire;
- e. Burning must only be undertaken during favorable weather conditions (i.e. shall not be undertaken during periods of extreme wind or during wet/ rainy conditions);
- f. Fires must be completely extinguished to ensure that smoldering of material does not persist;
- g. Burning practices shall minimize the scorching of the ground;
- h. Burning practices shall minimize impacts to surface or groundwater;
- i. Burning shall only occur within a confined area (e.g. within a cage or a ventilated burn box);
- j. Any residual waste and/or ashes shall be collected and disposed of after every burn at an appropriately approved facility; and
- k. Surface water runoff from the burn pit areas shall be managed to prevent any direct or indirect flow into surface or ground water to ensure that no additional impacts to water created.