

September 10, 2010

Sent by email: [licensing@nunavutwaterboard.org](mailto:licensing@nunavutwaterboard.org)

Phyllis Beaulieu  
Manager of Licensing  
Nunavut Water Board  
P.O. Box 119

Dear Ms Beaulieu:

**Project No: 60149115**

**Regarding: Water Board Licence No. 1BR-SIM0813  
Amendment Request – CAM-D Environmental Site Remediation**

On the behalf of Indian and Northern Affairs Canada (INAC), I would like to request an amendment to the Water License No. 1BR-SIM0813 issued for the CAM-D DEW Line Environmental Remediation Project. The request is to amend the section detailed below:

Part D: Conditions Applying to Waste Disposal

2. The Licensee is authorized to dispose 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 provided below:

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 at the same time eliminate the unnecessary burning of fossil fuels.

Wood placed into the on-site non-hazardous waste landfill will eventually degrade, which could potentially impact the structural integrity of the landfill. Therefore, avoiding disposal of wood wastes within the landfill will greatly reduce potential adverse impacts to the landfill integrity and ensure the landfill remains undamaged for the designed life span.

Lastly, shipping the wood off-site is a costly option and one that should be avoided.

It is believed that burning the wood in a controlled manner, following the burn plan proposed by the contractor, should have no permanent environmental impacts to the area.

A request was previously submitted to the Land Use Inspector responsible for this project, who was advised by the Land Administration HQ in Iqaluit that the request should be submitted to Nunavut Water Board as the burning permit is a concern related to the Water License and not the Land Use Permit.

If you have any comments or concerns please contact myself via email at [greg.wright@aecom.com](mailto:greg.wright@aecom.com) or via telephone at 418-780-6678.

Sincerely,  
**AECOM Canada Ltd.**



Greg Wright  
Departmental Representative  
CAM-D Environmental Site Remediation Project  
[greg.wright@aecom.com](mailto:greg.wright@aecom.com)

GTW  
Encl.

cc: Dele Morakinyo (INAC), Matthew McElwaine (PWGSC), Mike Zimmer (AECOM), François Bourassa (Kudlik)



**Kudlik Construction Ltd.**

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September 10<sup>th</sup>, 2010

to  
Public Works and Government Services Canada  
10025 Jasper Ave.  
5<sup>th</sup> floor  
Edmonton, Alberta  
T5J 1S6

Attention: Greg Wright

Reference: Request for a burning permit at CAM-D

Mr. Wright,

We would like to apply for a burning permit at CAM-D in order burn the scrap wood instead of burying it into the landfill. You will find hereunder the methodology that we will follow once the burning permit will be 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 disposal requirements of the ash. Ash meeting disposal criteria will be disposed in the Non-Hazardous Waste Landfill on site. All other ash will be containerized and shipped off site for disposal.
- Containerize all painted wood
- Dispose of treated wood in the non-hazardous landfill

Please let me know if additional information is required.

Best regards

Prepared by :

François Bourassa, P. Eng.  
Project Manager  
Kudlik Construction Ltd.