



October 7, 2010

Our reference  
File #9545-2-1.1BR.SIMA  
CIDM #429174

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

Your reference  
1BR-SIM0813/WD

Phyllis Beaulieu  
Manager of Licensing  
Nunavut Water Board  
Gjoa Haven, Nunavut  
X0E 1J0

**Re: Nunavut Water Board Licence #1BR-SIM0813, Indian and Northern Affairs Canada – Contaminated Sites Division, CAM-D DEW Line Environmental Remediation Project, Kitikmeot Region, Request for Open Burning**

Dear Phyllis,

Thank you for your September 27, 2010 notice of the Indian and Northern Affairs Canada – Contaminated Sites Division's request to open burn untreated and unpainted wood waste while carrying out their CAM-D DEW Line Environmental Remediation Project. Interested parties were invited to provide written representation by October 7, 2010.

A Technical Review Memorandum is provided for the Nunavut Water Board's consideration.

Please do not hesitate to contact me by telephone at 867 975-4555 or email at [david.abernethy@inac-ainc.gc.ca](mailto:david.abernethy@inac-ainc.gc.ca) to discuss this submission.

Regards,

David W. Abernethy  
Water Resources Regional Coordinator  
Operations Directorate  
Nunavut Regional Office  
Iqaluit, Nunavut  
X0A 0H0

Encl.

c.c.: L.A. Cornacchio, Water Resources Manager  
P. Kusugak, Field Operations Manager

## Technical Review Memorandum

**TO** Phyllis Beaulieu  
Manager of Licensing  
Nunavut Water Board

**OUR REFERENCE**  
File #9545-2-1.1BR.SIMA  
CIDM #429174

**FROM** David Abernethy  
Water Resources Regional Coordinator  
Indian and Northern Affairs Canada

**YOUR REFERENCE**  
3BM-HAL0810

**DATE**  
October 7, 2010

**SUBJECT** **Nunavut Water Board Licence #1BR-SIM0813, Indian and Northern Affairs Canada – Contaminated Sites Division, CAM-D DEW Line Environmental Remediation Project, Kitikmeot Region, Request for Open Burning**

### **A. PROJECT DESCRIPTION**

On Sept. 27/10 the Nunavut Water Board (NWB or Board) distributed a licence amendment request made by AECOM Canada Ltd. on behalf of Indian and Northern Affairs Canada's Contaminated Sites Division to allow the open burning of untreated and unpainted wood waste while carrying out the their CAM-D DEW Line Environmental Remediation Project. Interested parties were requested to review this submission and provide written representations by October 7, 2010.

Part D: Conditions Applying to Waste Disposal, Item #2 of the licence allows the burning of this material in an incinerator but AECOM has indicated that this would be impractical due to the size of the wood pieces and the volume of diesel fuel required for incineration. It is proposed that untreated and unpainted wood waste be open burned and that residual ash be directed to an onsite non-hazardous waste landfill if monitoring results demonstrate that this disposal practice is acceptable. Samples that do not meet monitoring criteria would be containerized and shipped off-site for disposal.

### **B. RESULTS OF REVIEW**

On behalf of the Indian and Northern Affairs Canada Water Resources Division I am providing the following comments / recommendations for the Board's consideration,

## **1. General**

- If approved, any open burning of untreated and unpainted wood waste should be consistent with similar proposals previously approved by the Board.

## **2. Disposal Criteria for Residual Ash**

- The submitted request for open burning of untreated and unpainted wood waste refers to the analysis of leachable metals in residual ash to determine whether the material can be disposed in the onsite non-hazardous waste landfill. Indian and Northern Affairs Canada's Contaminated Sites Division should provide a detailed summary of this monitoring program. As a minimum, the parameters that will be analyzed, the criteria used to determine if ash can be disposed in the onsite landfill, who will collect the samples, where the ash will be analyzed, and the frequency of sample collection should be provided.

Prepared by David Abernethy