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EC file: 4105 006 204  
NWB file: 1BR-SIM0813

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*Via email: [licensing@nunavutwaterboard.org](mailto:licensing@nunavutwaterboard.org)*

**RE: 100927 1BR-SIM0813 Remediation site – Request for open burning**

Environment Canada (EC) has reviewed the information submitted with the above-mentioned request to the Nunavut Water Board (NWB). The following specialist advice has been provided pursuant to the *Canadian Environmental Protection Act*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

AECOM on behalf of Indian and Northern Affairs Canada (INAC) is requesting, under existing water license 1BR-SIM0813, that the open burning of untreated and unpainted wood waste be permitted at DEW Line site CAM-D. Untreated and unpainted wood would be burned as part of the remediation plan and would involve the segregation of the wood, the burning of untreated and unpainted wood in a container suitable to contain the ash, and then sampling of the ash to determine disposal requirements. Ash meeting disposal criteria, determined through a leachate extraction test, will be disposed of in the non-hazardous waste landfill on-site while all other ash will be containerized and shipped off-site for disposal. Open burning is requested due to the large size of the materials (i.e., larger than the capacity of the on-site incinerator), to reduce the use of diesel fuel necessary to operate the incinerator, and to avoid disposal of wood wastes in the on-site non-hazardous waste landfill.

EC does not encourage the open burning of waste wood as a means of disposal and provides the following comments and recommendations for the NWB's consideration:

- Solid wastes that are conditionally suitable for open burning are paper products, paperboard packaging and untreated wood. Plywood, painted wood or other treated wood should not be disposed of in an open pit. For reference, attached is the Nunavut Open Burning Policy and below is a link to information from EC regarding open burning:  
[http://www.ec.gc.ca/gdd-mw/684B44DD-5780-4F73-BC58-A97E31A19EDC/COM1170\\_Open\\_Burning\\_Brochure\\_e\\_v6\\_for%20web.pdf](http://www.ec.gc.ca/gdd-mw/684B44DD-5780-4F73-BC58-A97E31A19EDC/COM1170_Open_Burning_Brochure_e_v6_for%20web.pdf)
- EC recommends that all non-combustible associated structure waste (i.e., plastics, tar paper, floor coverings, shingles, insulation, wiring, and tents) be thoroughly removed prior to burning
- EC recommends that all residual waste from the burning (i.e. nails and coals) be thoroughly collected, removed from site, and disposed of at a suitable facility.

If there are any modifications to the proposed project, EC should be notified, as further review may be necessary. Comments previously submitted on behalf of EC would still apply to this project. Please do not hesitate to contact me with any questions or comments with regards to the foregoing at (867) 975-4631 or by email at [Paula.C.Smith@ec.gc.ca](mailto:Paula.C.Smith@ec.gc.ca).

Yours truly,



Paula C. Smith  
Environmental Assessment Coordinator

cc: Carey Ogilvie (Head, Environmental Assessment-North, EPO, Yellowknife, NT)  
Ron Bujold (Environmental Assessment Technician, EPO, Yellowknife, NT)