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File: **1BR-SIM0813/TR/D2** 

October 12, 2010

Mr. Greg Wright
Department Representative
CAM-D Environmental Project
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Subject: <u>Licence No. 1BR-SIM0813</u>, "CAM-D (Simpson Lake)

<u>Intermediate Dew Line Site" Kitikmeot Region, Nunavut" – Indian and Northern Affairs Canada – Contaminated Sites;</u>
Request to Carry out Open Burning of Acceptable Materials

Dear Mr. Wright:

The Nunavut Water Board ("NWB") received on September 10, 2010, a request from AECOM Canada Ltd. to burn, without the use of an incinerator, acceptable materials in accordance with established policy and guidelines<sup>1, 2, 3, 4</sup> which apply to open burning in Nunavut. On September 27, 2010, the NWB acknowledged receipt and distributed the request to interested persons and parties for a ten day review period.

Comments were received from Environment Canada (EC) and Indian and Northern Affairs Canada (INAC). EC stated that conditionally suitable for open burning solid wastes are paper products, paperboard packaging and untreated wood. EC recommended that all non-combustible associated structure waste be thoroughly removed prior to burning, and that all residual waste from the burning be thoroughly collected, removed from site and disposed of at a suitable facility.

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

<sup>2</sup> http://www.ccme.ca/assets/pdf/d\_and\_f\_standard\_e.pdf

<sup>3</sup> http://www.ec.gc.ca/gdd-mw/default.asp?lang=En&n=F53EDE13-1

<sup>4</sup> http://www.gov.nu.ca/env/Open%20burning.pdf

INAC stated that if approved, any open burning of untreated and unpainted wood waste should be consistent with similar proposals previously approved by the Board. INAC recommends also that leachate metals analysis (monitoring program) to be conducted to determine disposal requirements of the ash.

Upon review of the request, supporting documentation, terms and conditions in Licence 1BR-SIM0813, and submissions from interested persons and/or parties, the NWB is satisfied that the activity, as proposed by the Licensee, would not directly or indirectly impact surface waters, which is a requirement under Section 12.1(a), (b) of the Nunavut Waters and Nunavut Surface Rights Tribunal Act, and maintain its obligations to adhere to the terms and conditions in licence. In addition to the Government of Nunavut Department of Environments established policy on open burning, the NWB has included as Appendix A, a summary of the guideline and additional practices for carrying out the activity. The NWB has, therefore, approved the request under Board Motion No. 2010-17-L05, dated October 12, 2010.

The Licensee is advised of its obligations to comply with all of the terms and conditions in its licence as well as all applicable regulations.

Should you have any questions on the above and attached, please feel free to contact the undersigned at 867-360-6338 ext. 30 or by email at <a href="k.kharatyan@nunavutwaterboard.org">k.kharatyan@nunavutwaterboard.org</a>, at your earliest convenience.

Yours truly,

Karén Kharatyan Technical Advisor

cc: Distribution List – Kitikmeot

## APPENDIX A – PRACTICES FOR OPEN BURNING

Permission for open burning of untreated and unpainted wood materials was requested for the CAM-D (Simpson Lake) DEW Line Environmental Remediation Project, Nunavut. The following key operational conditions are to be undertaken by Licensee

- a. Carrying out of controlled solid waste burn of suitable wastes, in accordance with established Government of Nunavut Policy 4,5;
- b. The request was for the approval of controlled burning of untreated and unpainted wood products at the CAM-D (Simpson Lake) DEW Line Environmental Remediation Project;
- c. No treated wood, plywood, or contaminated or waste petroleum-based materials, including wood materials contaminated with contaminated or waste petroleum or petroleum derivatives, will be burned or used as accelerants;
- d. All unpainted and untreated wood will be burned 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;
- e. Burning will only be undertaken during favorable weather conditions (i.e will not be undertaken during periods of extreme wind or during wet rain conditions);
- f. The size of the burn pile will 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;
- g. Fires will be completely extinguished to ensure that any smoldering of material does not persist; and
- h. Leachate extraction test (leachate 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.