



Nunavut Regional Office (NRO)
P.O. Box 2200
Iqaluit, NU, X0A 0H0



September 11, 2013

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board
P.O. Box 119, Gjoa Haven,
Nunavut X0B 1J0

Dear Ms. Beaulieu,

**RE: Water Board Licence No. 1BR-STU1318
Amendment Request – CAM-A (Sturt Point) Environmental Site
Remediation**

There is a significant amount of untreated and unpainted wood that are suitable for burning as part of the remediation work on CAM-A site. Condition 2 of Part D: Conditions Applying to Waste Disposal of the current licence (1BR-STU1318) authorizes the burning of this sort of wood in an incinerator. However, we would like to request for permission to "open burn" the wood rather than incinerating it.

The incinerator (forced-air, fuel-fired), currently approved for burning combustible wastes generated on-site, is not designed to burn large pieces of wood. Also, the burning of diesel fuel to incinerate the wood is unnecessary and will generate unwanted emissions. 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 diesel (a fossil fuel).

The alternative to burning is to ship the wood off-site for disposal in a southern landfill. This is a costlier alternative that should be avoided. In addition, wood placed in 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.

Our proposal or burn plan is as follows: All wood from surface debris and demolition debris on the site will be collected and segregated into treated/painted wood and the untreated/ unpainted wood. The treated wood will be shipped off-site for proper disposal in southern facilities that accept such wastes. All the untreated/unpainted wood will be burned, in a controlled manner, in a container suitable to contain the ash. The ash residual will be sampled and tested to ensure that it meets disposal requirements. In the event that the residual exceeds required disposal criteria, the ash will be shipped off-site for disposal in waste a treatment facility that accepts such waste.



Aboriginal Affairs and
Northern Development Canada

Affaires autochtones et
Développement du Nord Canada

Looking forward to hearing from you soon concerning this request.

Should you have any questions or require further details concerning this request, please do not hesitate to contact the undersigned or the Project Manager, Dele Morakinyo at dele.morakinyo@aandc-aadnc.gc.ca, or by telephone at (819) 934-9224

Sincerely,

Natalie Plato, P. Eng.
Director, Lands & Contaminated Sites
Tel: (867) 975-4730;
Fax: (867) 975-4736
Email: natalie.plato@aandc-aadnc.gc.ca