



Water Resources
Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence
1BR-STU1318

September 26, 2013

Our file - Notre référence
CIDM# 741562

Phyllis Beaulieu
Manager, Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0A 1J0

**Re: 1BR-STU1318 – Amendment Request – Open Burning – CAM-A (Sturt Point)
Environmental Remediation Site**

Dear Phyllis Beaulieu:

Please be advised that Aboriginal Affairs and Northern Development Canada (AANDC) have completed a review of the request for open burning for water license 1BR-STU1318 (Sturt Point CAM-A) submitted by Aboriginal Affairs and Northern Development Canada (AANDC). The Nunavut Water Board ("NWB" or the "Board") circulated the request for open burning for comments on September 13, 2013. All documents related to the request posted on the NWB ftp site under 1BR-STU1318 were included in my review (See attached Technical Review Memo).

Should you have any questions or comments, please do not hesitate to contact me at (867) 975-4568 or by e-mail at Rory.MacDonald@aandc-aadnc.gc.ca

Regards,

Sent via Email

Rory MacDonald
Water Resources Technician

Cc. Murray Ball, Manager of Water Resources, AANDC
Erik Allain, Manager of Field Operations, AANDC



Technical Review Memorandum

To: Phyllis Beaulieu – Manager of Licensing, Nunavut Water Board

From: Rory MacDonald – Water Resources Technician, AANDC

Existing Water Licence: 1BR-STU1318

**Re: 1BR-STU1318 – Amendment Request – Open Burning – CAM-A (Sturt Point)
Environmental Remediation Site**

1. Project Description

The CAM-A (Sturt Point) DEW Line Site is located 80km east of the community of Cambridge Bay and contained several military support facilities. The site was deactivated in 1963 and support facilities were removed from in 1970. Site assessments conducted in 1995 identified areas of soil contamination above the Canadian Council of the Ministries of Environment (CCME) standards. Based on environmental issues as outlined in the environmental site assessment, remediation activities include dump remediation; debris removal; contaminated soil remediation; and containerization and off-site removal of hazardous wastes.

In a letter submitted to the NWB on September 11, 2013, AANDC has requested the authorization of open burning for a significant amount of untreated and unpainted wood that is suitable for burning. The current licence 1BR-STU1318 allows for the burning of this material in an incinerator, however an open burn is currently not authorized under the licence. The current incinerator on site is not capable of handling large pieces of wood. The proposed open burn would be facilitated to ensure materials are burned in a controlled manner and would collect all ash in a suitable sized container.

2. Results of Review and Recommendations

AANDC Water Resources Division offers the following comments and recommendations for the Board's consideration.

A. General

AANDC notes that past inspections of authorized open burn sites have contained non compliant items such as treated and painted wood products, plastics, wiring, metals, and other hazardous materials which have an effect on the natural environment (i.e. dioxins, furans, nitrogen oxides and Polycyclic Aromatic Hydrocarbons (PAH's)).

The proposed activity is for the burning of untreated and unpainted wood products that are too large for the incinerator. AANDC has assessed the environmental risks associated with the proposed open burning request by AANDC for CAM-A (Sturt Point) and conclude that there is little risk to the environment for the proposed burn.

For the proposed activities AANDC has the following recommendations:

1. Only wood products that have **not** been treated in any form shall be burned;
2. No treated wood or wood products, plywood or any other material treated or contaminated with petroleum based products should be burned;
3. All non-combustible materials associated with the waste wood (i.e., plastics, tar paper, floor coverings, shingles, insulation, wiring, and tents) shall be thoroughly **removed prior** to the burning of the waste wood;



4. The products mentioned in (1) above shall be in a size that is manageable and will ensure that a complete burn of the product(s) will occur;
5. The burn shall remain in a **'hot phase' or 'hot burn'** until complete combustion of the product(s) has taken place and no unburned wood debris is left over. Air assistance to the fire should be considered to improve complete combustion of the waste;
6. After the burn is complete, any ash or other residual debris (i.e. nails) found shall be cleaned up and disposed of in an appropriate matter;
7. Little evidence should remain that a fire occurred at the chosen location; and
8. Soil sampling may also be required at the inspector's discretion.