



Water Resources  
Nunavut Regional Office  
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March 18, 2014

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

Your file - Votre référence  
1BR-STU1318

Our file - Notre référence  
CIDM# 782248

**Re: 1BR-STU1318 – CAM-A (Sturt Point) DEW Line Site Remediation Project –  
Aboriginal Affairs and Northern Development Canada – Request for Open  
Burning**

Dear Ms. Beaulieu:

The Water Resources Division at Aboriginal Affairs and Northern Development Canada (AANDC) reviewed the request for authorization to open burn at the CAM-A (Sturt Point) DEW Line Remediation Project Site submitted by the AANDC Contaminated Sites Division.

The following advice has been provided pursuant to AANDC's mandated responsibilities for the enforcement of the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*. In conducting our review, AANDC Water Resources referred to the documents on the NWB FTP site under 1BR-STU.

The Water Resources Division appreciates the opportunity to provide comments to the NWB on the open burn request for water licence 1BR-STU1318. Should you have any questions or comments, please do not hesitate to contact me at (867) 975-4738 or by e-mail at [jean.allen@aandc-aadnc.gc.ca](mailto:jean.allen@aandc-aadnc.gc.ca)

Sincerely,

Sent via Email

Jean Allen  
Water Management Specialist

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: Jean Allen– Water Management Specialist, AANDC

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**Re: 1BR-STU1318 – CAM-A (Sturt Point) DEW Line Site Remediation Project – Aboriginal Affairs and Northern Development Canada – Request for Open Burning**

### **A. Project Description**

The CAM-A (Sturt Point) DEW Line Site, located 80km east of the community of Cambridge Bay, contained several military support facilities constructed in 1957 and abandoned from the DEW Line system in 1963. The Nunavut Water Board (NWB or the Board) issued water licence 1BR-STU1318 on August 7, 2013 to the AANDC Contaminated Sites Division (the Licensee) for the use of water and deposit of waste to carry out remediation activities including dump remediation, debris removal, contaminated soil remediation, and containerization and off-site removal of hazardous wastes.

On February 17, 2014, the Licensee requested authorization from the NWB for the open burning of a significant amount of untreated and unpainted wood as part of the remediation work at CAM-A. The current water licence 1BR-STU1318 authorizes the burning of untreated wood in an incinerator (Part D, Item 2), but open burning would allow the Licensee to burn large pieces of wood and to eliminate the unnecessary burning of diesel fuel. The Licensee requested to open burn untreated wood previously in September 2013 and in October 2013, the NWB approved a one-time and controlled open burning of untreated wood from October 4 to October 31, 2013.

The Licensee proposes to collect and segregate wood from surface debris and demolition debris on the site 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 and in the event that the residual exceeds required disposal criteria, the ash will be shipped off-site for disposal.

### **B. Results of Review**

AANDC Water Resources is satisfied that the proposed open burning request by the Licensee for CAM-A (Sturt Point) remediation project is unlikely to impact the freshwater receiving environment and offers the following recommendations for the Board's consideration:

- AANDC recommends that the NWB's Practices for Open Burning (Appendix A of the October 4, 2013 letter from NWB to AANDC) continue to apply for the proposed open burn at the CAM-A site.

- AANDC recommends that the Licensee include in their annual report, a summary of the open burn to summarize how the activities were carried out and that they were carried out in accordance with the NWB's practices above (i.e. type and quantity of waste burned, weather conditions at time of burn, disposal of residual waste and ashes (on-site vs. off-site), GPS coordinates of location(s) used for open burning, etc.).

AANDC notes that past inspections of authorized open burn sites have contained non-compliant items including treated and painted wood products, plastics, wiring, metals, and other hazardous materials which may directly or indirectly impact the natural environment (i.e. dioxins, furans, and Polycyclic Aromatic Hydrocarbons (PAH's)). For this reason, AANDC notes that soil/sediment sampling may also be required at the inspector's discretion.