Lupin Mines Incorporated

A wholly owned subsidiary of Elgin Mining Inc.

Lupin Mine

Nunavut, Canada

Landfill Management Plan

July 2014

Lupin Mines Incorporated #1204 – 700 West Pender Street, Vancouver, BC V6C 1G8

Executive Summary English

This Landfill Management Plan (LMP) has been prepared by Lupin Mines Incorporated (LMI), a wholly owned subsidiary of Elgin Mining Inc. (Elgin) for the Lupin Gold Mine to support the renewal of Water Licence 2AM-LUP0914 (Licence). The Project site is located in the Kitikmeot Region, Nunavut, 400 km north of Yellowknife, Northwest Territories and 285 km southeast of Kugluktuk. The site is on the western shore of Contwoyto Lake, approximately 60 km south of the Arctic Circle. The site has been in a state of care and maintenance since 2006. LMI continues to evaluate the feasibility of returning to operations.

The LMP has been developed to provide the operating and closure parameters for the landfill, which has been used since the Mine opened in the 1980s. It details the materials that are suitable for landfilling, materials suitable for open burning, approach to covering the landfill on a regular basis to prevent wind-blown debris, and the closure approach for the landfill.

Executive Summary Inuktitut



Executive Summary Inuinnaqtun



Table of Contents

Exe	ecutive Summary English	ii
Exe	ecutive Summary Inuktitut	iii
Exe	ecutive Summary Inuinnaqtun	iv
Tab	ole of Contents	v
List	of Tables	v
1.	Introduction	1
2.	Background	1
3.	Environmental and Sustainable Development Policy	2
4.	Waste Management Practices	3
5.	Waste Items Acceptable for Landfilling	4
6.	Waste Items Acceptable for Open Burning	6
7.	Landfill Deposition Protocol	7
8.	Landfill Closure	7
9.	References	8
Арі	pendix A – Lupin Mine Site Figure with Landfill and Burn Pit Locations	9
Арј	pendix B – Applicable Guidelines	11

List of Tables

No table of figures entries found.

1. Introduction

Lupin Mines Incorporated (LMI), a wholly owned indirect subsidiary of Elgin Mining Inc. (Elgin), has prepared this Landfill Management Plan (LMP) for the Lupin Mine (Mine) to provide operational and closure details of the existing landfill at the Mine.

The Mine is located in the Kitikmeot Region, Nunavut, 400 km north of Yellowknife, Northwest Territories and 285 km southeast of Kugluktuk. The airport serving this Site is at 65° 46′00″ N and 111° 14′41″ W. The Site is on the western shore of Contwoyto Lake, approximately 60 km south of the Arctic Circle (Appendix A).

The landfill is required for the disposal of non-salvageable, non-hazardous wastes from standard mining activities that cannot be incinerated or openly burned. Landfills are a common requirement of remote mining operations and help mitigate effects of wind-blown debris. The landfill at the Mine has operated since the early 1980s when mining commenced and continued to operate periodically through to 2005 when the Mine was last put in care and maintenance. In the past, it is understood that non-hazardous items were designated as landfill waste and buried within the surface waste rock piles. The landfill is required during operations, care and maintenance, and closure phases. Once the Mine commences permanent closure and reclamation, demolition materials will also be deposited in the underground workings as noted in the Abandonment and Restoration Plan. The landfill will be closed and restored towards the end of closure activities.

Waste management in Nunavut is regulated under the Nunavut Public Health Act, the Nunavut Environmental Protection Act and the federal Environmental Protection Act. In addition to mandatory requirements, a number of waste management guidelines are commonly used in Nunavut and Northwest Territories. Those guidelines are provided in Appendix B.

2. Background

Elgin is a Canadian based company focused on the production at the Björkdal Gold Mine located in Sweden, and the exploration and development of the Lupin Gold Mine and Ulu Gold Project, both located in Nunavut, Canada.

Elgin purchased LMI, which owns the Lupin Mine, from MMG Resources Ltd. in July 2011. Lupin was in operation from 1982 to 2005 with temporary suspensions of activities between January 1998 and April 2000, and again between August 2003 and March 2004. The Mine resumed production in March 2004 until February 2005. Since then, the Mine has remained in Care and Maintenance.

General site maintenance and facilities upgrades have been carried out. Mining activities were screened by the Nunavut Impact Review Board under file 99WR053 and licensed by the Nunavut Water Board.

Surface exploration is conducted under a separate type B water licence. All camp infrastructure required for the surface exploration program currently exists at the Mine.

Company: Lupin Mines Incorporated Project: Lupin Gold Mine, Nunavut

Company Address: #1204 – 700 West Pender Street, Vancouver, BC, V6C 1G8

Tel: 604-682-3366

Email: gfriesen@elginmining.com

Attention: George Friesen Effective date: July, 2014

3. Environmental and Sustainable Development Policy

Elgin Mining Inc. and its subsidiaries (collectively, "Elgin Mining") are committed to maintaining a safe, clean, compliant and respectful work environment. Elgin Mining looks to our employees, contractors and managers to adopt and grow a culture of social responsibility and environmental excellence. Together we achieve this by:

- Promoting environmental stewardship in all tasks. Nothing is too important that it cannot be
 done in a clean and responsible manner. We strive towards maintaining a zero-incident work
 place.
- Recognizing that we have a shared responsibility as stewards of the environment in which we operate. We will not walk away from a non-compliant act.
- Identifying, managing and mitigating environmental, business and social risks in an open, honest and transparent manner.
- Planning our work so it is done in the cleanest possible manner and executing work according to plan.
- Continually improving environmental and operational performance by setting and reviewing achievable targets.
- Providing appropriate and necessary resources in the form of training, personnel and capital, including that required for closure planning and reclamation.
- Managing our materials and waste streams, maintaining a high degree of emergency response
 preparedness and minimizing our operational footprint to maintain environmental protection at
 all stages of project development.
- Procuring goods and services locally, where available, and favouring suppliers with environmentally and socially responsible business practices.
- Seeking to understand, learn from and mitigate the root causes of environmental incidents and near misses when they do occur.

- Employing systems and technology to achieve compliance, increase efficiency and promote industry best practices in development, operations and environmental stewardship.
- Working with stakeholders to identify and pursue opportunities for sustainable social and economic development and capacity building.
- Conducting early and ongoing stakeholder engagement relevant to the stage of project and mine development and operation.
- Recognizing diversity in the workplace and building meaningful relationships with all stakeholders in a timely, collaborative and transparent manner.

Through implementation of this policy, Elgin Mining seeks to earn the public's trust and be recognized as a respectful and conscientious employer, neighbor and environmental steward.

Approved by the Board of Directors on August 10th, 2012

4. Waste Management Practices

In accordance with the Waste Management Plan (2013), the approach for the disposal of solid waste is to first identify and segregate waste streams for appropriate handling. Acceptable items that can be landfilled are those that are non-hazardous, non-putrescible, with a low leachate and heat generation potential. All other materials will either be incinerated, open burned, placed in the underground working, or backhauled offsite. Limiting the materials that can be placed in the landfills greatly reduces the concentration of constituents in leachate.

Wastes that may contain food products, including packaging waste or other organic waste that could attract wildlife will be incinerated in the Mine's incinerator commissioned in 2012. This includes all garbage from the camp, kitchen, site lunchrooms and offices. The ash from the incinerator is placed in drums and disposed of at the landfill. Incinerator ash samples can be collected and tested for metals to confirm suitability for landfilling. In the event ash is not suitable for landfilling, drums are backhauled to a licensed waste disposal facility in the south.

In addition to the incinerator, the Mine has two open burn pits as shown in Appendix A. Non-hazardous oversized materials, including untreated wood products, are burned in the burn pits to reduce the volume of waste entering the landfill. Open burning is conducted in accordance with the Government of Nunavut and Government of Northwest Territories guidelines provided in Appendix B, and as outlined in section 6.0.

Non-hazardous waste suitable for landfilling, as detailed in section 5.0, will be deposited in the existing landfill in an orderly manner to reduce surface area and the potential for wind-blown debris as described in section 7.0.

5. Waste Items Acceptable for Landfilling

The Waste Management Plan (2013) notes that non-combustible, non-hazardous materials were historically placed within the landfill area and constantly kept covered. In the past, it is understood that the following items were designated as landfill waste and buried within the surface waste rock piles:

- Wood;
- Iron products;
- Plumbing piping (copper, steel, etc.);
- Electrical wiring;
- Compressed gas containers;
- Rubber products;
- Tires;
- Heavy plastics (pails, etc.);
- Plexiglass;
- Glass;
- Vehicle lights;
- Fibreglass;
- Styrofoam boards;
- Insulation;
- Plaster and plaster boards;
- Hydraulic rubber hoses;
- Rock resin; and
- Ash produced from incinerator.

The following additional materials will be acceptable for disposal at the landfill:

- Plastic (except expanded polystyrene);
- Wire;
- Roofing;
- Asphalt;
- Concrete;
- Carpet;
- Bricks;
- Ceramics;
- Tires;
- Caulking;
- Clothing;
- Plexiglass
- Light bulbs:

- Not including fluorescent tubes which can contain mercury phosphor powder and traces of lead and cadmium, which are considered environmental contaminants under the Nunavut Environmental Protection Act (EPA). The only disposal method for fluorescent tubes is through an approved hazardous waste recycling or disposal facility in accordance with the Waste Management Plan.
- The Disposal Guidelines for Fluorescent Lamp Tubes are included in Appendix B.

Waste Asbestos:

- Asbestos that has been immersed or fixed in a natural or artificial binder or included in a manufactured product is not considered waste asbestos, it is considered a hazardous waste (and will be disposed of accordingly). Waste asbestos can either be backhauled off-site for disposal in an approved facility or it can be landfilled. The following are guidelines for landfilling waste asbestos:
 - Immediately buried and covered with 0.5 m of cover material
 - Buried where it will not be disturbed
 - The location should be maintained on a map or diagram for future reference
- o The complete Environmental Guideline for Waste Asbestos is included in Appendix B.
- Small appliances (with batteries removed);
- Plaster and Gyproc; and
- Vehicles and machinery provided all liquids, grease, batteries, and electronics have been removed:
 - Ozone depleting substances (ODSs) include chlorofluorocarbons (CFCs) or halons and common sources include refrigeration equipment, air conditioning equipment, motor vehicle air conditioners and fire extinguishing equipment. These materials are hazardous in nature; consequently, all disposal of ODS will take place by backhaul to an approved facility. Equipment containing ozone depleting substances should have the ODS removed by a certified technician prior to disposal in the landfill.
 - The Environmental Guideline for Ozone Depleting Substances is included in Appendix B.

All other items shall be disposed of in accordance with the Waste Management Plan (2013), or as approved by the Inspector on an as needed basis.

6. Waste Items Acceptable for Open Burning

Controlled open burning is an efficient method of reducing the volume of certain waste types at remote sites, and minimizing landfill requirements. One burn pit is located on site adjacent to the landfill, and a second one is located at the north end of the site. Historically, combustible non-hazardous, non-domestic waste were open-burned at these locations, downwind of camp and away from waterbodies. The burn pits are also founded on previously burned areas and cited away from the landfill to mitigate the potential spread of fire.

To divert wastes from the landfill and minimize the overall volume of waste, LMI will carry out periodic controlled burns of clean wood, paper and cardboard materials using the guidance found in the Government of Nunavut Guideline for the Burning and Incineration of Solid Waste, and Government of the Northwest Territories guidance on Municipal Solid Wastes Suitable for Open Burning. Measures to be implemented for controlled open burning include:

- Only paper, paperboard packing, untreated wood waste and natural fiber textiles are burned.
- The waste is burned in a controlled manner and at a location which is separate from combustible vegetation and other materials or areas including the existing landfill.
- Burning takes place only on days when winds are light and blowing away from camp and waterbodies (east northeast).
- Waste is burned in manageable volumes so the fire does not get out of control.
- The burn pile will be maintained to create an efficient hot burn using consistent feed rates and mixtures.
- The fire is started, attended and monitored at all times by authorized and qualified personnel with resources to control the fire (shovels, rakes, water, fire extinguisher).
- Fires will be extinguished to ensure smoldering material does not persist.
- The waste is kept dry or covered to the extent practicable prior to burning.
- Building demolition wastes should not be burned unless they have been sorted to remove nonwood wastes such as roofing materials, electrical wire, plastics, asbestos and other non-wood wastes.

7. Landfill Deposition Protocol

Landfill operations will involve the clearing of snow cover as needed, placement of mine rock over the summer period, and placement of a graded cover as needed prior to the winter season when snow accumulation occurs.

Trucks will haul waste to the landfill and a dozer, or similar type of compacting equipment, will spread and level the waste. Waste materials will be deposited in rows or designated areas on a systematic basis and covered regularly. Wastes will be deposited directly on the landfill surface located within the mine rock pile and compacted with heavy equipment against the mine rock. Waste will be placed at one end of the designated area at full height followed by a progressive advancement of the deposition area. Areas where the waste has been placed to full height and levelled will be progressively covered by placement of a minimum 0.3 m thickness of rock fill on top of the waste to prevent wind-blown debris.

The landfill does not require a full-time attendant. The Mine Manager or acting designate will appoint a landfill inspector to undertake periodic inspections of the Landfill operations to identify deposition sequencing based on volumes of waste, verify compliance with the LMP, including observations of unsuitable materials and corrective actions, wildlife sign, evidence of erosion, ponding or unusual landfill settlement, and adequacy of safety measures.

The leachate from the landfill is anticipated to be clean due to the controls on materials placed in the landfills.

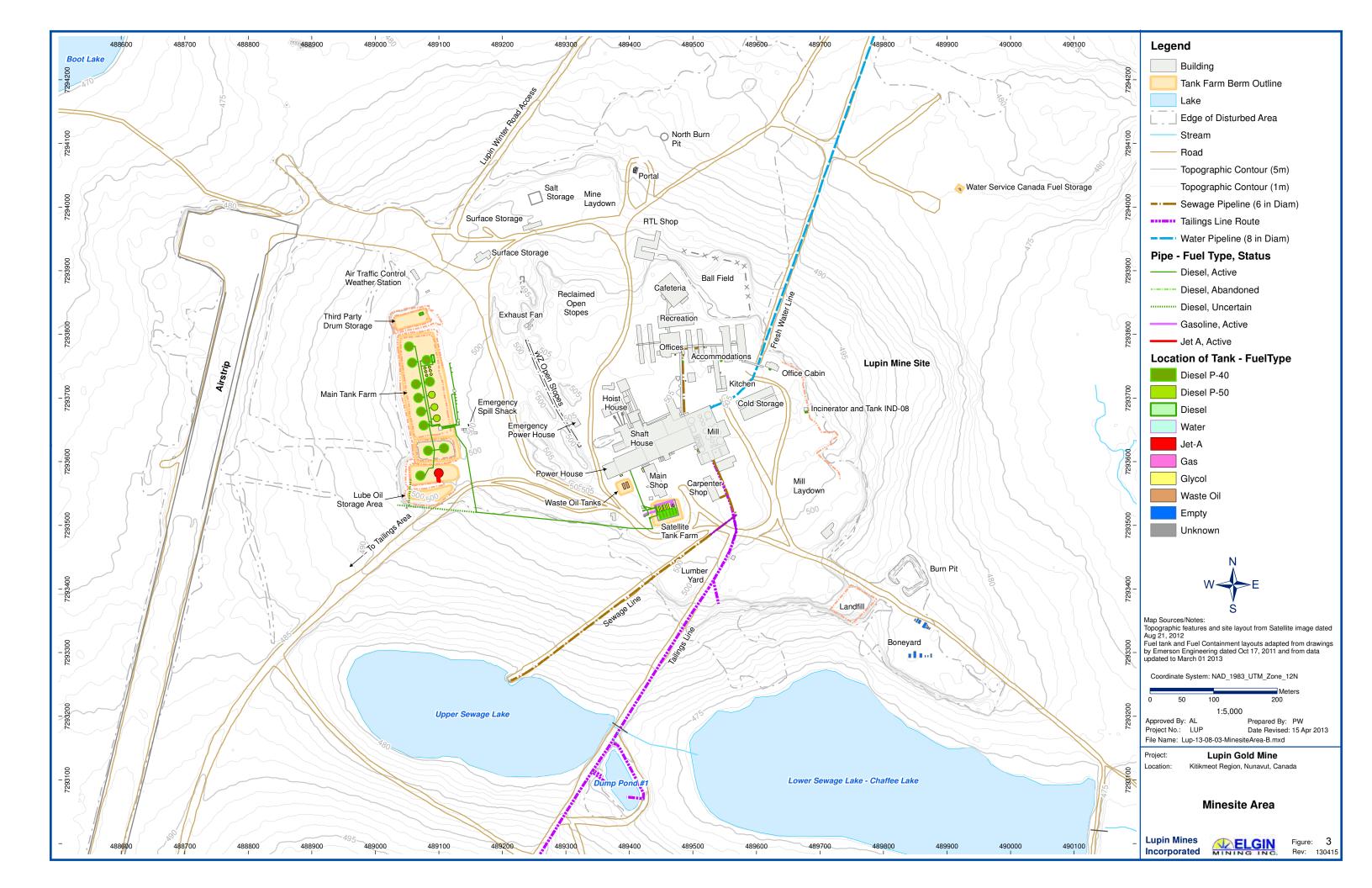
8. Landfill Closure

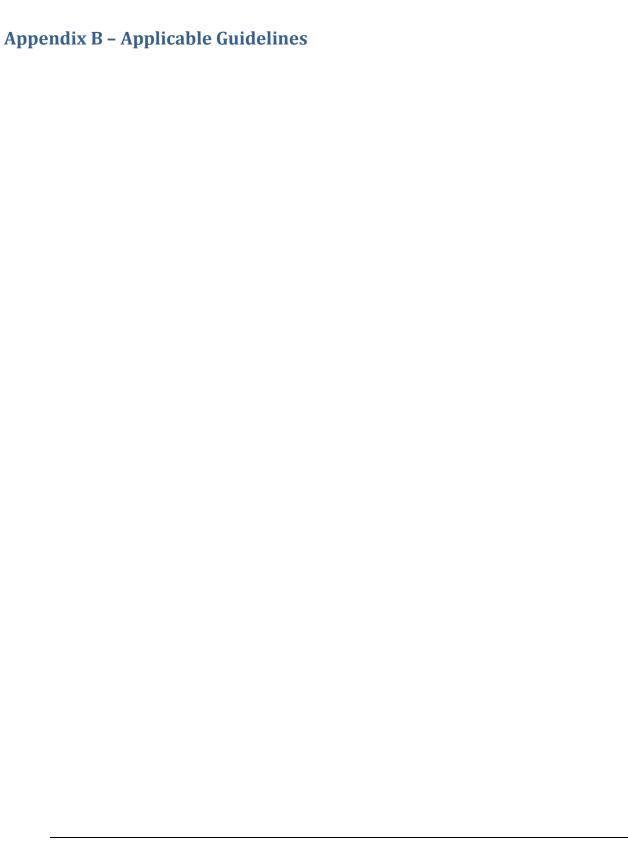
No future end use of the landfill post-closure is planned. The landfill will become part of the mine rock pile, anticipated to be closed permanently towards the end of the active closure phase. The waste in the landfill will be covered progressively during operations and a minimum 1 m final thickness of rockfill will be placed above the waste material at closure to fill potential voids. The final surface will be contoured to blend with the mine rock pile.

Additional details on the closure and reclamation of the landfill area will be incorporated into a final closure and reclamation plan for the Mine in accordance with Part I of the Licence.

9. References Waste Management Plan (2013). Lupin Mine Site Nunavut, Canada. Waste Management Plan (Solid and Hazardous) (Care and Maintenance) March 2013.







Environmental Guideline for the Burning and Incineration of Solid Waste









GUIDELINE: BURNING AND INCINERATION OF SOLID WASTE

Original: October 2010 Revised: January 2012

This Guideline has been prepared by the Department of Environment's Environmental Protection Division and approved by the Minister of Environment under the authority of Section 2.2 of the *Environmental Protection Act*.

This Guideline is not an official statement of the law and is provided for guidance only. Its intent is to increase the awareness and understanding of the risks, hazards and best management practices associated with the burning and incineration of solid waste. This Guideline does not replace the need for the owner or person in charge, management or control of a solid waste to comply with all applicable legislation and to consult with Nunavut's Department of Environment, other regulatory authorities and qualified persons with expertise in the management of solid waste.

Copies of this Guideline are available upon request from:

Department of Environment
Government of Nunavut
P.O. Box 1000, Station 1360, Iqaluit, NU, XOA 0H0
Electronic version of the Guideline is available at http://env.gov.nu.ca/programareas/environmentprotection

Cover Photos: Nunavut Department of Environment (left and bottom right), Aboriginal Affairs and Northern Development Canada (top right)

Table of Contents

Intro	duction.		1
1.1	Definiti	ons	1
1.2	Roles a	nd Responsibilities	4
	1.2.1	Department of Environment	4
	1.2.2	Generators of Solid Waste	4
	1.2.3	Other Regulatory Agencies	4
Wast	e Burnin	g and Incineration	7
2.1	The Co	mbustion Process	7
2.2	Polluta	nts of Concern	8
2.3	Burning	g and Incineration Methods	9
	2.3.1	Open Burning	9
	2.3.2	Incineration	11
2.4	Enviror	nmental Standards	13
	2.4.1	Air Emissions	13
	2.4.2	Bottom Ash	14
Best I	Manage	ment Practices	15
3.1	Waste	Management Planning	15
3.2	Wastes	That Can be Burned or Incinerated	16
3.3	Keepin	g Waste Dry	16
3.4	Locatin	g the Facility	17
3.5	Maxim	izing Combustion Efficiency	18
3.6	Ash Ma	inagement	18
3.7	Monito	ring and Record Keeping	19
3.8	Operat	or Training	20
The A	pplicati	on of Open Burning and Incineration	21
4.1	Open B	urning	21
4.2	Inciner	ation	23
Concl	usion		26
Refer	ences		27

Appendices

Appendix 1 Environmental Protection Act

Appendix 2 Modified Burn Barrel Design and Specifications

Introduction

People living and working in Nunavut often have limited options available for cost effective and environmentally sound management of household and other solid waste. The widespread presence of permafrost, lack of adequate cover material and remote locations make open burning and incineration a common and widespread practice to reduce the volume of solid waste and make it less of an attractant to wildlife. A wide variety of combustion methods are used ranging from open burning on the ground to high temperature dual-chamber commercial incinerators. Generally, high temperature incinerators are more expensive to purchase and operate and cause less pollution than do the less expensive and lower temperature methods. However, high temperature incinerators can safely dispose of a wider variety of waste than can the lower temperature open burning methods.

The Guideline for the Burning and Incineration of Solid Waste (the Guideline) is not intended to promote or endorse the burning and incineration of solid waste. It is intended to be a resource for traditional, field and commercial camp operators, communities and others considering burning and incineration as an element of their solid waste management program. It examines waste burning and incineration methods that are used in Nunavut, their hazards and risks and outlines best management practices that can reduce impacts on the environment, reduce human-wildlife interactions and ensure worker and public health and safety. This Guideline does not address incineration of biomedical waste, hazardous waste and sewage sludge. The management of these wastes requires specific equipment, operational controls and training that are beyond the scope of the current document.

The *Environmental Protection Act* enables the Government of Nunavut to implement measures to preserve, protect and enhance the quality of the environment. Section 2.2 of the *Act* provides the Minister with authority to develop, coordinate, and administer the Guideline.

The Guideline is not an official statement of the law. For further information and guidance, the owner or person in charge, management or control of a solid waste is encouraged to review all applicable legislation and consult the Department of Environment, other regulatory agencies or qualified persons with expertise in the management of solid waste.

1.1 Definitions

Burn Box

Biomedical Waste	Any solid or liquid waste which may present a threat of infection to humans including non-liquid tissue, body parts, blood or blood products and body fluids, laboratory and veterinary waste which contains human disease-causing agents, and discarded sharps (i.e. syringes, needles, scalpel blades).
Bottom Ash	The course non-combustible and unburned material which remains at the burn site after burning is complete. This includes materials remaining in the burn chamber, exhaust piping and pollution control devices where such devices are used.

A large metal box used to burn solid waste. Combustion air is usually supplied passively through vents or holes cut above the bottom of the box. An exhaust pipe or stack may or may not be attached.

Commercial Camp

A temporary, seasonal or multi-year facility with a capacity greater than 15 people and which has been established for research, commercial or industrial purposes. A commercial camp does not include a traditional camp or field camp.

Commissioner's Land

Lands that have been transferred by Order-in-Council to the Government of Nunavut. This includes roadways and land subject to block land transfers. Most Commissioner's Land is located within municipalities.

Contaminant

Any noise, heat, vibration or substance and includes such other substance as the Minister may prescribe that, where discharged into the environment,

- (a) endangers the health, safety or welfare of persons,
- (b) interferes or is likely to interfere with the normal enjoyment of life or property,
- (c) endangers the health of animal life, or
- (d) causes or is likely to cause damage to plant life or to property.

Determined Effort

The ongoing review of opportunities for reductions and the implementation of changes or emission control upgrades that are technically and economically feasible and which result in on-going reductions in emissions. Determined efforts include the development and implementation of waste management planning which is focussed on pollution prevention.

De Novo Synthesis

The creation of complex molecules from simple molecules.

Environment

The components of the Earth and includes

- (a) air, land and water,
- (b) all layers of the atmosphere,
- (c) all organic and inorganic matter and living organisms, and
- (d) the interacting natural systems that include components referred to in paragraphs (a) to (c) above.

Field Camp

A temporary, seasonal or multi-year facility consisting of tents or other similar temporary structures with a capacity of 15 people or less and which has been established for research, commercial or industrial purposes. A field camp does not include a traditional camp or commercial camp.

Fly Ash

Unburned material that is emitted into the air in the form of smoke or fine particulate matter during the burning process.

Hazardous Waste

A contaminant that is a dangerous good and is no longer wanted or is unusable for its original intended purpose and is intended for storage, recycling, treatment or disposal.

Incineration

A treatment technology involving the destruction of waste by controlled burning at high temperatures.

Incinerator A device or structure intended primarily to incinerate waste for the purpose

of reducing its volume, destroying a hazardous substance in the waste or destroying an infectious substance in the waste. An incinerator has means

to control the burning and ventilation processes.

Inspector A person appointed under subsection 3(2) of the Environmental Protection

Act and includes the Chief Environmental Protection Officer.

Modified Burn Barrel A metal drum used to burn waste that has been affixed with devices or

features which provide limited increased heat generation, heat retention

and holding time.

Open Burning Burning of waste with limited or no control of the burn process. For clarity,

open burning includes burning on the open ground or using a burn box or

unmodified or modified burn barrel.

Qualified Person A person who has an appropriate level of knowledge and experience in all

relevant aspects of waste management.

Responsible Party The owner or person in charge, management or control of the waste.

Smoke The gases, particulate matter and all other products of combustion emitted

into the atmosphere when a substance or material is burned including dust,

sparks, ash, soot, cinders and fumes.

Solid Waste Unwanted solid materials discarded from a household (i.e. single or

multiple residential dwellings, other similar permanent or temporary dwellings), institutional (i.e. schools, government facilities, hospitals and health centres), commercial (i.e. stores, restaurants) or industrial (i.e. mineral, oil and gas exploration and development) facility. For clarity, solid waste does not include biomedical waste, hazardous waste or sewage

sludge.

Traditional Camp A temporary or seasonal camp used primarily for camping, hunting, fishing

or other traditional or cultural activities. A traditional camp does not

include a field camp or commercial camp.

Unmodified Burn Barrel A metal drum used to burn waste that has not been affixed with devices or

features which provide for enhanced heat generation, heat retention and

holding time.

Untreated Wood Wood that has not been chemically impregnated, painted or similarly

modified to improve resistance to insects or weathering.

Waste Audit An inventory or study of the amount and type of waste that is produced at

a location.

1.2 Roles and Responsibilities

1.2.1 Department of Environment

The Environmental Protection Division is the key environmental agency responsible for ensuring the proper management and disposal of solid waste and other contaminants on Commissioner's Land. Authority is derived from the *Environmental Protection Act*, which prohibits the discharge of contaminants to the environment and enables the Minister to undertake actions to ensure appropriate management measures are in place. Although programs and services are applied primarily to activities taking place on Commissioner's and municipal lands and to Government of Nunavut undertakings, the *Environmental Protection Act* may be applied to the whole of the territory where other controlling legislation, standards and guidelines do not exist. A complete listing of relevant legislation and guidelines can be obtained by contacting the Department of Environment or by visiting the web site at:

http://env.gov.nu.ca/programareas/environmentprotection.

The Wildlife Management Division is responsible for managing wildlife in Nunavut. Section 90 of the *Wildlife Act* prohibits the intentional feeding of wildlife and the placement of any food or garbage where there is a reasonable likelihood that it would attract wildlife. Once wildlife has been 'conditioned' to obtaining food associated with human activities, it can become dangerous and often will have to be destroyed. Further information on ways to reduce contact between wildlife and humans can be obtained by contacting the local Conservation Officer or by visiting the web site at:

http://env.gov.nu.ca/programareas/wildlife.

The Department of Environment will provide advice and guidance on the burning and incineration of solid waste. However, it remains the responsibility of the owner or person in charge, management or control of the solid waste to ensure continued compliance with all applicable statutes, regulations, standards, guidelines and local by-laws.

1.2.2 Generators of Solid Waste

The generator, or responsible party, is the owner or person in charge, management or control of the solid waste at the time it is produced or of the facility that produces the waste. The responsible party must ensure the waste is properly and safely managed from the time it is generated to its final disposal. This is referred to as managing the waste from cradle-to-grave.

Contractors may manage solid waste on behalf of the responsible party. However, the responsible party remains liable for ensuring the method of management complies with all applicable statutes, regulations, standards, guidelines and local by-laws. If the contractor does not comply with the requirements of the *Environmental Protection Act* or *Wildlife Act* and is charged with a violation while managing the waste, the responsible party may also be charged.

1.2.3 Other Regulatory Agencies

Other regulatory agencies may have to be consulted regarding the burning and incineration of solid waste as there may be other environmental or public and worker health and safety issues to consider.

Workers' Safety and Compensation Commission

The Workers' Safety and Compensation Commission is responsible for promoting and regulating worker and workplace health and safety in Nunavut. The Commission derives its authority from the *Workers' Compensation Act* and *Safety Act* which require an employer to maintain a safe workplace and ensure the safety and well being of workers.

Department of Community and Government Services

The Department of Community and Government Services is responsible under the *Commissioners' Lands Act* for the issuance of land leases, reserves, licenses and permits on Commissioner's Lands. The Department, in cooperation with communities, is also responsible for the planning and funding of municipal solid waste and sewage disposal facilities in most Nunavut communities.

The Office of the Fire Marshal is responsible for delivering fire and life safety programs including reviewing plans to ensure incinerators and other heating devices comply with all legislation, codes and standards. The Office of the Fire Marshal derives its authority from the *Fire Prevention Act, National Fire Code* and *National Building Code*.

Department of Health and Social Services

Activities related to the burning and incineration of solid waste may have an impact on public health. The Office of the Chief Medical Officer of Health and Regional Environmental Health Officers should be consulted regarding legislated requirements under the *Public Health Act*.

Environment Canada

Environment Canada is responsible for administering the *Canadian Environmental Protection Act* (CEPA) and Canada's Toxic Substances Management Policy. Many pollutants that are released into the atmosphere from the incomplete combustion of unsegregated, or mixed, solid waste are listed as Toxic Substances in Schedule I of CEPA, or are targeted for phase-out through the Toxic Substances Management Policy. Environment Canada is also responsible for administering the pollution prevention provisions of the federal *Fisheries Act* and for regulating the international and interprovincial movement of solid and liquid hazardous waste under the *Interprovincial Movement of Hazardous Waste Regulations* and *Export and Import of Hazardous Waste and Hazardous Recyclable Material Regulations*.

The Air Quality Research Division of Environment Canada is responsible for conducting research into atmospheric releases of chemicals in commercial use in Canada, measuring exhaust emissions from stationary and mobile sources and undertaking ambient air quality monitoring in partnership with provinces and territories.

Aboriginal Affairs and Northern Development Canada

Aboriginal Affairs and Northern Development Canada is responsible under the *Territorial Lands Act* and *Nunavut Waters and Nunavut Surface Rights Tribunal Act* for the management of federal lands and waters, including the impact solid waste may have on the quality of these lands and waters.

Local Municipal Governments

The role of municipal governments is important in the proper local management of solid waste. Under the Nunavut Land Claims Agreement, municipalities are entitled to control their own municipal disposal sites. Local environmental and safety standards are determined, in part, by how the land is designated under municipal government development plans (i.e. land use zoning). Solid waste may be deposited into municipal landfill sites only with the consent of the local government. The local fire department may also be called upon if a fire or other public safety issue is identified.

Co-management Boards and Agencies

Co-management boards and agencies established under the Nunavut Land Claims Agreement have broad authority for land use planning, environmental impact assessment and the administration of land and water. Activities involving the burning and incineration of solid waste may be controlled through the setting of terms and conditions in plans, permits and licenses issued by the Nunavut Water Board and other co-management boards and agencies.

Waste Burning and Incineration

2.1 The Combustion Process

The combustion, or burning, of solid waste proceeds through a series of stages. Water is first driven from the unburned waste by heat produced from material burning nearby or from an auxiliary burner. As the waste heats up, carbon and other substances are released and converted into burnable gases. This is referred to as gasification. These gases are then able to mix with oxygen. If the temperature inside the burn chamber is high enough and maintained for a long enough period of time, the hot gases are completely converted into water vapour and carbon dioxide, which is then released into the air. If the temperature inside the burn chamber is not high enough and the burn time is too short, complete conversion of the burnable gases does not occur and visible smoke is released into the air. Another result of burning at low temperatures is the creation of pollutants that were not originally present in the waste. This process is known as *de novo* synthesis. Dioxins, furans and other complex chemical pollutants can be formed through this process.

Ash produced from combustion takes the form of either fly ash or bottom ash. Fly ash is the fine particles carried away in the form of smoke while bottom ash is the course non-combustible and unburned material that remains after the burn is complete. The type and amount of pollutants in the fly and bottom ash depend upon what waste is burned and completeness of the combustion process.

The completeness of combustion is determined by all of the following factors:

Temperature

The temperature generated is a function of the heating value of the waste and auxiliary fuel, incinerator or burn unit design, air supply and combustion control. Complete combustion requires high temperatures. Generally, temperatures that exceed 650°C with a holding time of 1-2 seconds will cause complete combustion of most food and other common household waste. Segregation of waste is required when using methods that don't routinely achieve these temperatures. Dual chamber incinerators, which are designed to burn complex mixtures of waste, hazardous waste and biomedical waste, must provide a temperature higher than 1000°C and a holding time of at least one second to ensure complete combustion and minimize dioxin and furan emissions. When these high temperatures and holding times are achieved, waste will be completely burned and ash, smoke and pollutant concentrations will be minimized.

Because exhaust gas temperatures vary from ambient to greater than 1000°C each time a batch waste incinerator is used, optional air pollution control systems with evaporative cooling towers and scrubbers are seldom recommended. However, it may be necessary to employ these systems with large continuous feed incinerators if additional cleaning of exhaust gas is required by regulatory authorities.

Holding Time

Complete combustion takes time. Holding time, otherwise known as retention or residence time, is the length of time available to ensure the complete mixing of air and fuel, and thus the complete burning of waste. Low temperatures, low heating values of the waste and reduced turbulence require that the holding time be increased to complete the combustion process.

Turbulence

The turbulent mixing of burnable gases with sufficient oxygen is needed to promote good contact between the burning waste and incoming air. This will help in achieving the high temperatures at which waste can be completely burned. The amount of mixing is influenced by the shape and size of the burn chamber and how the air is injected. Passive under-fire ventilation achieved during open burning does not result in sufficient turbulence for the burning of a wide variety of waste. Also, it is important not to overfill the burn chamber as airflow may be blocked and the amount of turbulence further reduced. The more advanced incineration designs provide effective turbulence through the forced introduction of air directly into hot zones.

Composition of the Waste

The heating value, wetness and chemical properties of the waste affect the combustion process and the pollutants that are contained in the resulting smoke and ash. The higher the burn temperature, holding time and turbulence that are achieved, the less effect the composition of the waste has on completeness of the burn.

2.2 Pollutants of Concern

Extreme care must be exercised when burning or incinerating solid waste. Open burning and the improper incineration of solid waste can result in environmental, health and safety hazards from the pollutants found in smoke and exhaust gases and in the bottom ash. These pollutants may either be found in the original waste itself, or may be created through *de novo* synthesis if sufficient temperature, holding time and turbulence is not achieved in the burn chamber.

Many different types of pollutants can be released during burning and incineration. A few of these pollutants include acid gases, trace metals, fine particulates, volatile organic compounds and semi-volatile organic compounds. Acid gases such as hydrogen chloride and sulphur oxides result from burning waste that has high levels of chlorine and sulphur (i.e. plastics). Mercury, lead and cadmium are examples of trace metals found in both fly and bottom ash when batteries, used lubricating oil and other metal-containing wastes are burned. Fine particulates are the very small particles found in smoke created by incomplete combustion and can cause respiratory irritation in humans and wildlife.

Dioxins and furans are pollutants that have drawn much attention in recent years because they have been linked to certain types of cancers, liver problems, impairment of the immune, endocrine and reproductive systems and effects on the fetal nervous system. These pollutants persist in the environment for long periods of time, bioaccumulate in plants and animals, result predominantly from human activity and have been identified for 'virtual elimination' in Canada under the federal Toxic Substances Management Policy. The incineration of solid waste accounts for almost 25% of the dioxin and furan emissions in Canada each year. They are formed in trace amounts by *de novo* synthesis during the low temperature burning of waste containing organic compounds and chlorine (i.e. chlorinated plastic, PVC pipe, marine driftwood).

The most effective way to reduce or minimize the release of pollutants is to segregate the waste before burning and achieve sufficiently high temperature, holding time and turbulence in the burn chamber. Open burning produces more smoke and pollutants, including dioxins and furans, than does an incinerator capable of achieving complete combustion.

2.3 Burning and Incineration Methods

The burning and incineration method used is a major factor in determining what type of waste can be safely and effectively disposed of. The methods commonly used in Nunavut include open burning on the ground, unmodified burn barrels and various mechanical incineration systems. Other useful methods include the use of burn boxes and modified burn barrels. Each method is discussed separately in the following sections.

2.3.1 Open Burning

Open burning means the burning of waste where limited or no control of the combustion process can be exercised by the operator. This method includes burning solid waste directly on the open ground or in burn boxes or burn barrels and often does not achieve the temperatures or holding time needed for complete combustion of the waste to occur. This results in the formation of potentially hazardous pollutants and ash, which are likely to impact nearby land and water. Food waste that is not completely burned through open burning can also be a powerful attractant for animals.

The various open burning methods can also present a risk of uncontrolled vegetation and tundra fires through the release of hot sparks or embers. The level of fire risk depends upon the type of open burning used, its location, the skill of the operator and the environmental conditions that exist at the time (i.e. dryness of the surrounding vegetation, wind).

The open burning of solid waste remains a common practice in Nunavut. It is the policy of the Department of Environment to eliminate or minimize open burning of mixed solid waste to the extent practicable and to encourage more acceptable methods of disposal and incineration.

Open Burning on the Ground

Open burning on the ground involves burning solid waste that has been piled directly on the surface of the ground or placed in a small open pit. Many large and small communities and camp operators in Nunavut continue to practice open burning on the ground as a means of reducing the volume of solid waste that must ultimately be disposed of. In general,



Figure 1 – Open Burning on the Ground Photo courtesy of Aboriginal Affairs and Northern Development Canada

open burning on the ground results in the incomplete combustion of waste and the release of various harmful pollutants to the air, can cause vegetation or tundra fires through the uncontrolled release of hot sparks and embers, and is actively discouraged by the Nunavut Department of Environment as a method for disposing of unsegregated or mixed solid waste.

Burn Boxes

There are two basic types of burn boxes. The *enclosed burn box* is constructed using heavy sheets of steel or other metal while the *open burn box* is constructed using expanded metal grating. The latter type is commonly referred to as a *burn cage*. These devices are not commercially-available in Nunavut, but can be constructed using locally available materials. For example, the enclosed metal burn box shown in Figure 2 is made from a dump truck bed and steel plating.



Figure 2 – Enclosed Metal Burn Box Photo courtesy of Alaska Department of Environmental Conservation

Burn boxes are considered a modification of open burning. Combustion air is provided passively using a natural draft making electricity unnecessary. Burn boxes are single chambered units. Waste is raised off the bottom of the box by placing it on grates inside the unit. Unburned bottom ash falls through the grate during burning making removal easier once a sufficient amount has accumulated. Combustion air in enclosed burn boxes is typically provided by cutting holes near the bottom of the box allowing for better mixing with the burning waste.

Open burn boxes, or burn cages, are an improvement over enclosed burn boxes as the waste is exposed to natural drafts through the metal grating on all surfaces including the bottom. This enables air to better mix with burning waste and promotes more efficient combustion throughout the burning period.

Both types of burn boxes are constructed with hinged tops to enable easier loading and cleaning.

Unlike open burning on the ground, burn boxes help to contain the burning waste within a specific location reducing the risk of fire spreading to other disposal areas or surrounding tundra, while still enabling moderate amounts of solid waste to be burned.

Burn Barrels

There are two basic types of burn barrels – the unmodified burn barrel and modified burn barrel.



Figure 3 – Open Metal Burn Box Photo courtesy of Alaska Department of Environmental Conservation

The *unmodified burn barrel* is normally a 45 gallon, or 205 litre, metal fuel or oil drum with the top removed. These devices typically operate at a low temperature resulting in incomplete combustion of the waste and production of large volumes of smoke and fly ash.

A *modified burn barrel* is a 45 gallon metal fuel or oil drum that has been affixed with devices or features which result in higher burn temperatures, better mixing of the air and a longer holding time. These modifications include a 'metal mesh basket' insert or grate designed to suspend the burning waste.

Evenly spaced vents or holes cut above the bottom of the barrel supply combustion air. These features provide for enhanced passive under-fire ventilation and promote better contact between the waste being burned and incoming air. The basket insert is topped with a hinged lid and a chimney port for attachment of an exhaust pipe or stack. The lid helps to increase heat retention and holding time inside the barrel while also allowing for easier loading and mixing of the waste. The removable mesh basket enables access to the unburned bottom ash.

Modified burn barrels can be built using commonly available materials. They can either be pre-built locally or transported to the site for assembly. Detailed construction plans are provided in Appendix 2.

Although modified burn barrels are designed to create an advantage over open burning on the ground, burn boxes and unmodified burn barrels through achieving higher burn temperatures and increased turbulence and holding time, incomplete combustion of waste and the release of pollutants to the atmosphere are still likely. In fact, emissions testing by Environment Canada on a modified burn barrel in April 2011 suggest that these devices do not provide any improvement over open burning on the ground in terms of



Figure 4 – Modified Burn Barrel

emissions quality, particularly if wet food waste is added to the waste mixture. Other common problems include easily overfilling the unit and loading waste that should not be burned (refer to section 3.2). Wet or frozen masses of waste are particularly difficult to burn and the resulting partly burned food waste may still attract animals. The proper operation of modified burn barrels is critical to achieving the most efficient burn possible. Basic operating instructions are provided in section 4.1.

Burn barrels are capable of burning only small volumes of solid waste. Like burn boxes, they reduce the risk of fire spreading to vegetation and tundra by containing the burning waste to a specific location.

2.3.2 Incineration

Solid waste incinerators are engineered systems that are capable of routinely achieving burn temperatures in excess of 1000°C and a holding time of at least one second. Properly designed and operated incinerators are able to effectively and safely destroy a wide range of waste. Only incinerators designed for burning mixed municipal solid waste are discussed in the guideline. The incineration of

hazardous and biomedical waste and sewage sludge requires specific equipment, operational controls and training that are beyond the scope of the current document.

There are four basic types of incinerators. They vary based upon the number of burn chambers they have, the amount of air provided to each chamber and how waste is fed into the primary burn chamber.

Dual-Chamber Starved Air System

The primary burn chamber receives less air than is needed to achieve full combustion. Gases from this incomplete combustion then pass into a second burn chamber where sufficient air is injected and complete combustion is achieved.

Single Chamber Excess Air System More than a sufficient amount of air (as much as 50% more than the amount of air needed) is injected into the single burn chamber to achieve complete combustion of the waste.

Continuous Feed Incinerator

An incineration process that is in a continuous burn cycle. A continuous feed incinerator operates without interruption throughout the operating hours of the facility by having waste continually added to the primary burn chamber.

Batch Feed Incinerator

An incineration process that is not in a continuous or mass burning cycle. A batch feed incinerator is charged with a discrete quantity or single load of waste at the beginning of the burn cycle.

Batch feed dual-chamber controlled air incinerators currently operate at several remote industrial locations in northern Canada and Alaska. Although they are generally considered to have the highest qualities of all the incinerators and open burning methods mentioned, they must be designed for the type and quantity of waste to be burned. Too little heat and holding time will not allow waste to burn properly; too much heat will damage the incinerator.

Figure 5 illustrates the design of a typical batch feed dual-chamber controlled air incinerator. The main features of this type of incinerator are:

- Batch operation allows greater control of temperature and air throughout the burn process.
- Air turbulence can be reduced in the primary chamber so fewer particulates are released into the air from the stack.
- Although a wide range of wastes can be destroyed, waste may have to be segregated and remixed in order to achieve a uniform heating value close to the design point of the incinerator.
- Externally supplied fuel and electricity are needed for the burners and forced air ventilation.
- A properly operating dual-chamber controlled air system will reduce problems with animal attraction as the production of bottom and fly ash and smoke is minimized.

Section 2.3.2 is intended to provide the reader with a brief introduction to incinerators. It is not intended to provide information suitable for the design, selection or operation of an incineration system. Any person considering the purchase of an incineration system should first consult the system's manufacturer or other qualified persons with expertise in the incineration of solid waste.

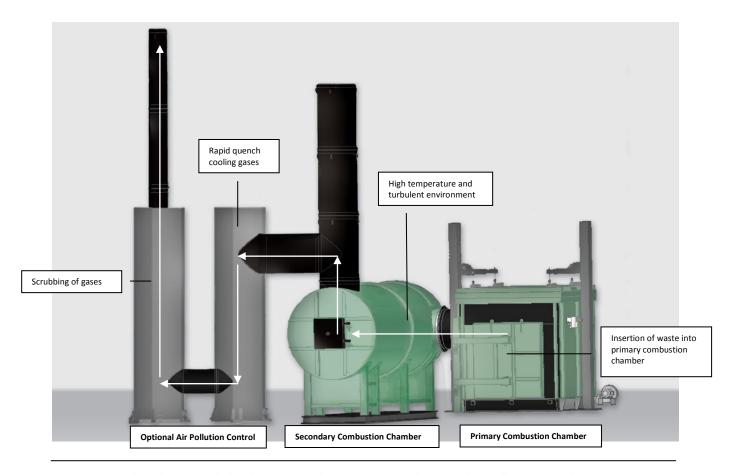


Figure 5 – Typical Batch Feed Dual-Chamber Controlled Air Incinerator with Optional Air Pollution Controls Illustration courtesy of Eco Waste Solutions

2.4 Environmental Standards

2.4.1 Air Emissions

Air emission standards establish limits on the amount of contaminants that can be released into the atmosphere. These standards are expressed as a concentration in the exhaust gases leaving the stack and are capable of being achieved using generally available incineration technology and waste diversion practices. The following emission standards¹ apply to existing, new or expanding solid waste incinerators operating in Nunavut and have been adopted from the Canadian Council of Ministers of the Environment (CCME) Canada-Wide Standards for Dioxins and Furans and Mercury Emissions, respectively. Similar standards for the open burning of solid waste have not been established.

¹ Stack concentrations are always corrected to 11% oxygen content for reporting purposes.

Table 1. Air Emission Standards for Solid Waste Incinerators

Parameter	Numeric Standard	Explanation
Dioxins and Furans	80 pg I-TEQ/cubic metre	Unit of measure is picograms of International Toxicity Equivalents per cubic metre of air
Mercury	20 μg/Rcubic metre	Unit of measure is micrograms per Reference cubic metre
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	P.O	(the volume of gas adjusted to 25°C and 101.3 kilopascals)

Opacity is the degree to which the exhaust gases reduce the transmission of light and obscure the view of any object in the background. It is expressed as a percentage representing the extent to which an object viewed through the gases is obscured. Although not an emission standard, opacity provides an indication of the general performance of the incinerator during normal operation². Opacity in the incinerator stack should not exceed 5%. While it is not anticipated that opacity levels would exceed 1% to 2% under normal operation, values greater than 5% indicate the incinerator is not performing properly and additional performance evaluation and adjustment is required.



Figure 6 - Examples of Smoke Opacity Ratings
The opacity ratings are estimates and are provided for illustrative purposes only
Centre and right photos courtesy of GNWT Department of Environment and Natural Resources

2.4.2 Bottom Ash

The Environmental Guideline for Industrial Waste Discharges into Municipal Solid Waste and Sewage Treatment Facilities establishes criteria for determining whether process residuals³ are suitable for disposal in landfill sites in Nunavut. For the purpose of this Guideline, process residuals include bottom ash from industrial and commercial incinerators. The Toxicity Characteristic Leaching Procedure Test method 1311 (US EPA) is the preferred method to analyze the residuals as this test is designed to simulate the processes a material would be subjected to if placed in a landfill.

Refer to the *Environmental Guideline for Industrial Waste Discharges into Municipal Solid Waste and Sewage Treatment Facilities* for additional information on the management of process residuals.

² The time during which optimum designed temperature is maintained in the burn chamber, and excludes 'startup' and 'cool down' operations.

³ Process residuals are the solid, semi-solid or sludge waste resulting from industrial operations.

Best Management Practices

Best management practices are methods and techniques that have been shown to be effective in preventing or reducing pollution. They include policies, prohibitions of practices, maintenance and monitoring procedures and other practices adopted by the responsible party. Implementing best management practices together with using best available technology is an effective means of reducing costs, reducing pollution and reducing a parties' legal liabilities.

3.1 Waste Management Planning

The generator of a waste is responsible for its safe management from cradle-to-grave. Using raw materials efficiently and reducing the amount of waste generated is the most important step in waste management planning. For example, through improved waste management planning, it may be possible to reduce or eliminate the need to burn or incinerate waste altogether. Undertaking a waste audit will help to identify the type and amount of waste being generated, the costs of current management options and examine opportunities for better managing the waste. This information will also enable the generator to implement a waste management regime that is tailored to its own unique needs, location and circumstances.

Even with improved waste reduction measures in place there will be waste generated. Waste by its nature is usually a mixture of different unwanted materials. The segregation and diversion of different types of waste is an effective way to reduce the amount of waste requiring costly handling, storage, treatment and disposal. Segregation also enables the reuse of certain types of waste for a different purpose. Reuse activities may be undertaken either on-site or off-site.

Treatment and disposal is the last step in effective waste management and should be undertaken only after all other practical reduction and reuse options have been examined. A wide variety of treatment and disposal options exist and each must be examined before deciding on a final method, regardless of whether waste is to be treated and disposed of on-site or off-site. If burning and incineration is the method of choice, equipment must be designed and sized accordingly to accommodate the type and quantity of waste being produced. As described in the following section, open burning is capable of safely destroying a limited number of types of waste. While incinerators are capable of safely destroying a wider range of waste, many types of waste must still be diverted. Because of this, on-site segregation remains a critical component of any waste management plan.

Overall, the following principles should be used to guide responsible solid waste management planning:

- Know your waste by conducting a waste audit.
- Reduce the amount of solid waste produced by implementing strategic purchasing policies that
 focus on the substitution or reduction of purchased products as well as product design,
 composition and durability.
- Reuse waste where different purposes can be identified.
- Segregate and divert mixed waste streams enabling waste to be reused or recycled, thereby reducing the amount of waste to be disposed of.
- All practical disposal methods should be examined. Burning and incineration of waste should be considered only where other practical methods do not exist.

• If burning and incineration is used, the equipment chosen should be designed and sized to accommodate the waste produced, minimize fire hazard and result in the complete combustion of the waste.

3.2 Wastes That Can be Burned or Incinerated

Complete combustion converts waste into inert bottom ash with minimal creation of smoke, fly ash and hazardous gases. Several factors influence this process including the heating value, wetness and chemical composition of the waste itself, operating conditions in the burn chamber (i.e. temperature, holding time and turbulence) and operator skill.

The method used is important in determining what can safely be burned. Certain wastes can only be incinerated using equipment that has been specifically designed and equipped with sufficient air pollution controls and that achieve specific air emission standards. For example, waste containing chlorinated compounds (i.e. chlorinated solvents and plastics, PVC piping, wood treated with pentachlorophenol or PCB-amended paint, marine driftwood) must be separated from other waste as their burning will result in the *de novo* creation and emission of various dioxin and furan compounds. Waste containing mercury (i.e. batteries, thermostats and fluorescent light bulbs) and other heavy metals (i.e. lead acid batteries, wood treated with lead paint) should not be burned as the mercury and heavy metals will not be destroyed. Other waste that should not be burned unless using specially designed incinerators include used lubricating oil, hydrocarbon contaminated soil, biomedical waste, sewage sludge or any other waste specifically prohibited by the Department of Environment.

Table 2 provides a listing of common wastes that can be burned and those that require special consideration and treatment. Note that open burning and incineration are identified as separate columns in the table and that different restrictions apply depending upon which method is used. In general, more restrictions apply to the various methods of open burning because of the incomplete combustion achieved. Fewer restrictions apply to incineration because of the operator's ability to control the combustion process.

Non-combustible materials such as metal and glass do not burn and will rob heat away from waste that can be destroyed by burning. Combustible waste should always be separated from non-combustible waste before being loaded into the burn chamber.

3.3 Keeping Waste Dry

Typical mixed garbage has a moisture content of less than 20% while the moisture content of food wastes can range up to 80%. Anything that can be done to reduce the moisture of waste burned will decrease the amount of smoke produced and increase the completeness of combustion. Waste should be covered or stored inside sheds or other secure buildings to keep rain and snow out of the waste. This will also lessen the opportunity for wildlife to access the waste. If wet waste must be burned, the wet waste should be mixed or layered with dry waste to reduce the overall moisture content of the waste burned. Mixing or layering waste in this manner is particularly important when loading wet solid waste into a burn box or modified burn barrel.

Table 2. Waste That Can be Burned or Incinerated

	Method		
Waste Type	Open Burning ⁴	Dual-Chamber Incinerator	
Paper products	✓	✓	
Paperboard packing including boxboard and cardboard	✓	✓	
Untreated wood including lumber and plywood	✓	✓	
Food waste		✓	
Food packaging		✓	
Natural fiber textiles	✓	✓	
Plastic and Styrofoam except plastic containing chlorine ⁵		✓	
Painted wood except wood painted with lead or PCB-amended paint		✓	
Wood treated with creosote or tar oil		✓	
Hydrocarbon spill absorbents		✓	
Animal carcasses except those affected by disease-causing agents		✓	

The following waste requires special consideration. It is not to be burned or incinerated unless the equipment used has sufficient air pollution controls, meets specific air emission standards and has been specifically designed to safely incinerate the waste product.

Hydrocarbon contaminated soil

Radioactive waste including smoke detectors

Organic compounds containing chlorine including plastics, solvents, PVC piping and marine driftwood Pesticides

Items containing mercury, lead or other heavy metals including paint, computer equipment and fluorescent bulbs

Batteries

Explosives

Pressurized cans, cylinders or other containers that may explode when heated

Synthetic fiber textiles

Biomedical waste and animal carcasses affected by disease-causing agents

Wood treated with pentachlorophenol, inorganic preservatives, lead paint or PCB-amended paint

Sewage sludge

Rubber tires

Used lubricating oil

Waste fuel except limited quantities used solely as a starting fuel

Construction and demolition waste including roofing materials, electrical wire and insulation

3.4 Locating the Facility

Distance from sensitive areas (i.e. camp, work site, drinking water supply) and prevailing wind direction are important factors to consider when locating any facility that burns waste. The facility should be kept

⁵ Chlorinated plastic materials are identified by the number "3" associated with the mobius loop symbol.



⁴ Includes open burning on the ground and the use of burn boxes, unmodified burn barrels and modified burn barrels.

at least 100 metres from any surface water body. Although the objective is to minimize pollutants being released to the air, the site should be selected so that any resulting emissions are adequately dispersed. This includes locating the structure or facility away from areas or features that may trap smoke close to the ground (i.e. located in a valley). Avoid burning waste if people will be living or working within the plume of smoke. The facility should be located on stable and level ground. A gravel, rocky outcrop or other area free of combustible materials and vegetation should be chosen to avoid accidently starting a vegetation or tundra fire.

3.5 Maximizing Combustion Efficiency

More smoke and other pollutants are released into the air during the 'start-up' and 'cool down' phases of the burn cycle than during the 'full burn phase' when high temperatures are maintained. Low temperature smoldering fires should be avoided. Burn only dry feedstock and periodically add additional waste to the fire in order to maintain high burn temperatures until all waste has been destroyed. If waste is to be open burned on the ground, the use of deep or steep-walled 'pits' should be avoided as this will prevent the necessary turbulent mixing of oxygen with the burnable gases.

Desired operating temperature should be achieved as quickly as possible when operating any burning or incineration device. A rapid 'start-up' can be achieved by first loosely loading dry paper, paperboard packing and untreated wood into the bottom of the device. Dry, loosely loaded material will ignite more quickly and burn more evenly than a wet, tightly packed load. Wet waste should only be added after the fire is actively burning. Overfilling the burn chamber will prevent the turbulent mixing of burnable gases and oxygen, and should be avoided.

Modern batch feed incinerators are designed with primary and auxiliary burners to achieve and maintain the necessary high burn temperatures. Additional waste should only be added to these incinerators once the 'cool down' phase has been completed and it is safe to do so.

3.6 Ash Management

The management of bottom ash and other unburned residue is an integral part of sound waste management and the ash will need to be disposed of. Extreme care must be exercised when handling ash because of its physical (i.e. glass, nails) and chemical hazards. Use closed or covered containers when moving or transporting bottom ash from the burning device or incinerator to the approved disposal site. This will minimize physical contact with the ash and the release of fine ash particles to the environment.

Avoid handling bottom ash until it is completely cool. Hot ash and embers can cause painful skin burns and should never be buried or landfilled as they could cause unburned waste in the disposal area to catch fire.

Bottom ash from the open burning of paper, paperboard packing, untreated wood waste and natural fiber textiles is suitable for burial in a designated pit or municipal landfill. Because incinerators can be used to destroy a wide variety of waste and the subsequent ash may contain a wide variety of toxic residues, bottom ash from an incinerator is suitable for burial only where it meets the criteria set out in Table 1 of the *Environmental Guideline for Industrial Waste Discharges into Municipal Solid Waste and Sewage Treatment Facilities*. Waste originating from outside a municipality and meeting the criteria may be deposited in municipal landfills only with the consent of the local government. Any bottom ash

not meeting the criteria set out in the *Environmental Guideline for Industrial Waste Discharges into Municipal Solid Waste and Sewage Treatment Facilities* is considered to be a hazardous waste. This ash is not suitable for landfilling and its management must comply with the *Environmental Guideline for the General Management of Hazardous Waste*.

3.7 Monitoring and Record Keeping

Burn boxes, burn barrels and incinerators should be inspected for signs of damage, corrosion or other physical defects before each burn cycle. Repairs must be completed before the equipment is used again to ensure the health and safety of the operator, nearby people and the environment.

The various open burning methods tend to produce large quantities of smoke. Burning dry waste, high burn temperatures and sufficient air mixing with the burnable gases will reduce, but not eliminate, the amount of smoke and other pollutants that are generated. Large quantities of dark smoke indicate problems and inefficiencies with the combustion process and the generation of pollutants. Keep records of when, how much and what waste was burned, how the waste was loaded into the burning device or incinerator, the amount of smoke and bottom ash generated, how the fire was started and any other information that would help remind the operator of what worked well, and what didn't. These records would also assist the operator, Department of Environment and other regulatory agencies if complaints of nuisance smoke were to be received.

The operation of incinerators should be monitored using on-line instruments capable of continuously measuring the combustion process and stack emissions. The most basic measurement associated with the combustion process is temperature in both the primary and secondary burn chambers. Temperature readings outside of the normal range can warn the operator that the system is not working properly. In-stack monitoring provides the operator with additional information on the combustion process and on pollutants that may be released to the environment. A continuous opacity or particulate monitor should be installed in the incinerator stack to monitor emissions quantity. Additional combustion chamber and in-stack sampling and monitoring may be required depending upon the type and quantity of waste being incinerated. Each process and in-stack monitor should be equipped with visible and audible alarms to warn operators of poor incinerator operation. Refer to section 4.2 for additional information on incinerator monitoring requirements.

Written records should be kept by incinerator operators of what waste is burned, when and how much. Other record keeping requirements for incinerators may include:

- Operating data including readings from the process and emissions monitoring instruments.
- Weather conditions (i.e. air temperature and wind speed) at the time the incinerator is being operated.
- Repairs and maintenance performed on the incinerator and monitoring instruments.
- Major changes in operation.
- Quantity, condition and disposal location of the collected bottom ash.
- · Operator training.

Records should be maintained on-site throughout the operational life of the facility and be made available to Inspectors and other regulatory officials upon request.

3.8 Operator Training

The cornerstone of ensuring proper and safe operation of any equipment is adequate operator training. Facility owners must ensure qualified operators are available and have been properly trained to operate the equipment under both normal and emergency conditions. This will help to ensure the continued operation and maintenance of the equipment and facility, protection of the environment and the continued health and safety of the operator and nearby people. In particular, operators of incinerators should be trained in the following areas:

- Physical and mechanical features of the equipment and facility.
- Operation and trouble-shooting procedures.
- Environmental and safety concerns related to operation of the facility.
- Spill and fire emergency response procedures.
- Emergency and accident reporting procedures including use of the NWT/Nunavut 24-Hour Spill Report Line at (867) 920-8130.

Every incinerator manufacturer has its own approach to designing and building incinerators. Operators should be qualified and trained to safely operate the specific make and model of incinerator they are expected to operate.

The Application of Open Burning and Incineration

The Department of Environment does not promote or endorse the burning and incineration of solid waste. This method of waste management should be implemented only after the owner or operator has made all reasonable and determined efforts to implement sound waste management planning and practices. Opportunities to reduce or eliminate the need for burning and incineration through changes in purchasing practices, reuse, recycling, segregation and diversion, and other changes or emission control upgrades that would result in emission reductions, must be reviewed periodically and implemented where practical. Refer to section 3 for additional information on best management practices.

This section provides guidance on the application of open burning and incineration of solid waste. In addition to the guidance and direction provided through the Guideline, the burning and incineration of solid waste may also be controlled through permits and licenses issued by Nunavut's co-management boards, Aboriginal Affairs and Northern Development Canada and other regulatory agencies. These permits and licenses must be complied with at all times.

4.1 Open Burning

Open burning is the burning of solid waste where limited or no control over the combustion process can be exercised by the operator. For the purposes of the Guideline, open burning includes burning waste that has been piled on the surface of the ground or placed in small open pits, or the use of a burn box, unmodified burn barrel or modified burn barrel. Open burning does not include the destruction of waste using a commercial or manufactured incinerator.

The open burning of unsegregated, or mixed, solid waste must not occur under any circumstances. Today's household, institutional, commercial and industrial garbage contains many materials which, when burned at low temperature, can result in the release of high levels of particulates, acid gases, heavy metals, carbon monoxide, dioxins, furans and other chemicals, some of which may cause cancer. The only solid wastes that may be disposed of through open burning are paper products, paperboard packing, untreated wood waste and natural fiber textiles (i.e. cotton, wool). Refer to section 3.2 for further information on what waste can and cannot be burned.

The open burning of solid waste remains a hazardous practice from a fire prevention and environmental management perspective. **Open burning on the ground** should not take place within a municipality without first obtaining authority to do so from the local community government. It should never occur at a municipal or industrial landfill because of the proximity of other combustible wastes within the working landfill. Where permission has been obtained and paper, paperboard packing, untreated wood waste and natural fiber textiles are open burned on the ground or in a small open pit, the activity must be attended and carefully monitored by a responsible adult at all times.

The preferred alternative to open burning on the ground is the use of an **enclosed burn box or burn cage**. These devices should be used when burning a moderate to large quantity of paper, paperboard packing, untreated wood waste and natural fiber textiles. They are designed to contain the waste while it is burning and reduce the likelihood of sparks or burning embers igniting adjacent vegetation and other combustible materials. When using a burn box or cage at a municipal or industrial landfill, extreme caution must be taken to ensure other areas of the working landfill are not ignited. Their

proper operation includes loading the device with dry waste to about half its capacity before igniting the fire. Additional or wet waste can be added in small batches so as not to dampen the fire once the fire has developed into a good flame and it is safe to do so.

The following general conditions should be met whenever open burning on the ground or burning using an enclosed burn box or burn cage takes place:

- Only paper, paperboard packing, untreated wood waste and natural fiber textiles are burned.
- The waste is burned in a controlled manner and at a site which is separate from combustible vegetation and other materials.
- Burning takes place only on days when winds are light and blowing away from people.
- Waste is burned in manageable volumes so the fire does not get out of control.
- The fire is started, attended and monitored at all times by authorized and qualified personnel.
- The waste is kept dry or covered to the extent practicable prior to burning.
- Where applicable, authority is first obtained from the municipality or other regulatory agencies.

Modified or unmodified burn barrels should only be used to burn small quantities of paper, paperboard packing, untreated wood waste and natural fiber textiles at remote locations such as traditional camps and field camps. Food and food packaging waste, which make up a significant portion of kitchen garbage produced at these camps, should not be burned. These wastes should be segregated daily and stored in wildlife-proof containers for frequent removal to an approved disposal site.

It is important that burn barrels are properly constructed and operated to ensure safety of the operator and the environment. Appendix 2 provides detailed construction drawings for a modified burn barrel. The Department of Environment will consider other designs if they provide an equivalent level of environmental protection.

Below are some easy-to-do actions to ensure unmodified and modified burn barrels are operated safely and waste is burned to the greatest extent possible⁶.

When locating and constructing a burn barrel:

- Locate the burn barrel in a place predominantly downwind of the camp site or burn only on days when the wind is light and blowing away from the camp.
- Ensure the burn barrel is located on gravel, rocky outcrop or other area free of combustible materials and vegetation to avoid accidently starting a tundra fire.
- Ensure the detailed plans provided in Appendix 2 are carefully followed when constructing a
 modified burn barrel. The 'exhaust gas to combustion air' ratio is particularly important to
 achieving the maximum burn rate. A 2:1 ratio of exhaust stack to air intake area consisting of a
 6-inch exhaust port and three 2-inch air intake holes positioned equidistantly around the
 bottom of the barrel a few inches up from the base is preferred.

⁶ Testing of a modified burn barrel was performed by Environment Canada's Air Quality Research Division in April 2011 at the request of Nunavut's Department of Environment. Ten trial burns were completed prior to emissions testing in order to optimize and standardize barrel design and operational procedures. Following the trial burns, four test runs were performed and air emission samples collected for analysis. Results of the emission testing program will be available from Nunavut's Department of Environment. This list of recommended practices reflects the operational observations and measurements made during the testing program.

When operating a burn barrel:

- Inspect the barrel for any signs of leakage, corrosion or other physical defects before each burn cycle. Any necessary repairs must be completed before the equipment is used.
- Burn only dry waste. If wet waste must be burned, mix or batch the waste with other
 waste that has a low moisture content and high heating value (i.e. dry wood). This will
 help ensure the slow-burning wet waste is completely burned.
- Burn only paper, paperboard packing, untreated wood waste and natural fiber textiles. Food
 and food packaging waste should not be burned. Burning non-combustible waste (i.e. metal
 and glass) will rob the fire of valuable heat and should also be avoided. Food and food
 packaging, non-combustible and other waste that cannot be burned should be segregated and
 removed from the site for disposal on a regular basis.
- Do not overfill or densely pack waste into the burn barrel as air will be prevented from properly mixing with the waste. This will result in a smouldering, low temperature burn and smoke.
- Layering wet or slow burning waste with dry fast burning waste will help ensure more complete combustion of all waste.
- The burn barrel should not be used unless a responsible adult is available to monitor and watch over it until the fire has completely cooled.
- When using a modified burn barrel, the exhaust port on the 'metal basket insert' should be aligned between two of the 2-inch air intake holes in order to avoid short-circuiting of the combustion air directly through to the stack. Also, the spark arrest screen should be cleaned following each burn to ensure the stack does not become blocked with soot and other debris. If the barrel lid begins to 'puff' during a burn, inspect the screen to ensure it is not obstructing the flow of exhaust gases.

Care must be taken by the operator at all times to avoid skin contact with hot surfaces and avoid breathing smoke and other exhaust gases.

Written records of open burning should be kept by the operator. These record what was burned, when and how much, how waste was loaded into the device, how the fire was started, its location, weather conditions at the time and any other information that may help remind the operator of what worked well, and what didn't. These records are to be made available for review upon request by an Inspector.

Bottom ash from the open burning of paper, paperboard packing, untreated wood waste and natural fiber textiles is suitable for burial in a designated pit or municipal landfill site. Consent to use a municipal landfill should first be obtained from the local government. Bottom ash must be completely cooled before it can be safely handled and disposed of. Refer to section 3.6 for further information.

4.2 Incineration

Incinerators differ from the simpler methods of open burning as the operator has a higher degree of control over the burning process. The resulting higher temperatures, longer holding times and greater turbulence lead to more complete combustion of the waste. Although a wider range of wastes can be destroyed using high temperature single or dual-chambered incinerators, determined efforts should still be taken to reduce the quantity and type of waste generated and to implement other changes which would result in reductions in air emissions. Refer to section 3 for further information proper waste management practices and a listing of what waste can and cannot be incinerated.

The incinerator manufacturer's operating instructions must be followed at all times to ensure designed temperature, holding time and turbulence conditions are achieved and to avoid damage to the facility. When operating during winter months, additional care must be taken because cold air introduced into the primary and secondary chambers may make it difficult for normal operating temperatures to be achieved. Operators must be properly trained and qualified to operate the equipment under both normal and emergency conditions. Owners are strongly encouraged to consult system manufacturers or other qualified persons with expertise before purchasing an incinerator. Additional guidance on the selection of incinerator technologies and their operational requirements can be obtained by referring to Environment Canada's *Technical Document for Batch Waste Incineration*.

The installation and operation of monitoring and control systems is critical for the proper and safe operation of any incinerator. The design, installation, certification and operation of continuous emissions monitoring systems (CEMS) should comply with the principles described in Environment Canada's *Protocols and Performance Specifications for Continuous Monitoring of Gaseous Emissions from Thermal Power Generation*. While the document is written for power generation facilities, the principles apply equally well to other types of facilities and continuous emissions monitoring systems. For incinerators operating in Nunavut, key operational parameters must be monitored at all times using on-line instruments capable of continuously measuring the combustion process and stack emissions quality. These instruments should be equipped with visible and audible alarms and be on-line whenever the incinerator is in operation, including 'start-up' and 'cool down' phases. Table 3 lists the monitoring and control system requirements.

Table 3. Incinerator Monitoring and Control System Requirements

	Quantity of Waste to be Burned ⁷	
System Description	Less than 26 Tonnes per Year	Greater than 26 Tonnes per Year
Weight and composition of feedstock waste on a batch basis	✓	✓
Temperature in the primary and secondary combustion chambers	✓	✓
Opacity in the stack ⁸	✓	✓
Initial Certificate of Operation ⁹		✓

While not a specific requirement of the Guideline, additional one-time or continuous emissions monitoring may be required depending upon the type and quantity of waste to be incinerated. Examples include monitoring oxygen and carbon monoxide in the undiluted gases exiting the combustion chamber, such as a secondary chamber of a conventional dual-stage incinerator. Annual or periodic stack sampling for hydrogen chloride, dioxins and furans may also be required where the feedstock includes a significant quantity of organic materials that contain chlorine (i.e. chlorinated solvents and plastics, PVC piping, marine driftwood). The reader is encouraged to contact Nunavut's Department of Environment for guidance on additional emissions monitoring requirements.

⁷ The CCME Canada-Wide Standard for Dioxins and Furans Emissions from Waste Incinerators and Coastal Pulp and Paper Boilers (2001) established a criterion of 26 tonnes per year to distinguish between a 'small facility' and 'large facility' incinerator.

⁸ An acceptable alternative to monitoring opacity is to continuously monitor particulate matter in the stack.

⁹ An initial Certificate of Operation includes satisfactory confirmation based on manufacturers' or third-party testing and certification that the unit is capable of complying with the requirements contained in the Guideline when operated in accordance with the manufacturer's recommendations and with minimal requirement for operator attention. The Certificate is to be provided to the Nunavut Department of Environment before the incinerator is placed into routine operational service.

Monitoring and control data should be recorded each time a burn cycle is completed. Records are to be maintained for the operational life of the incinerator and made available for review upon request by an Inspector. Refer to section 3.7 for additional information on monitoring and record keeping.

Bottom ash and other solid residue collected from the incinerator is suitable for burial where it meets the criteria set out in Table 1 of the *Environmental Guideline for Industrial Waste Discharges into Municipal Solid Waste and Sewage Treatment Facilities* or in accordance with land use permits and water licenses issued by Nunavut's co-management boards and Aboriginal Affairs and Northern Development Canada. Where bottom ash meets the criteria and is to be disposed of into a municipal landfill, the quantity transported off-site must be recorded and the consent of the local municipal government first be obtained. Bottom ash not meeting the criteria set out in the *Environmental Guideline for Industrial Waste Discharges into Municipal Solid Waste and Sewage Treatment Facilities* is considered to be a hazardous waste and must be managed in accordance with the *Environmental Guideline for the General Management of Hazardous Waste*.

Conclusion

This is a general introduction to the practice of burning and incinerating solid waste. It is not intended to promote or endorse the practice but to provide the reader with information on the risks, hazards and best management practices associated with this activity. It also provides specific guidance on the application of burning and incinerating solid waste should this practice be undertaken by municipalities and operators of traditional, field and commercial camps.

Familiarity with the Guideline does not replace the need for the owner or person in charge, management or control of the solid waste to comply with all applicable federal and territorial legislation and municipal by-laws. The burning and incineration of solid waste may be controlled through permits and licenses issued by Nunavut's co-management boards, Aboriginal Affairs and Northern Development Canada and other regulatory agencies. These permits and licenses must be complied with at all times.

For additional information on the management of solid waste, or to obtain a complete listing of available guidelines, contact the Department of Environment at:

Environmental Protection Division
Department of Environment
Government of Nunavut
Inuksugait Plaza, Box 1000, Station 1360
Iqaluit, Nunavut, XOA 0H0

Phone: (867) 975-7729 Fax: (867) 975-7739

Email: EnvironmentalProtection@gov.nu.ca

Website: http://env.gov.nu.ca/programareas/environmentprotection

References

Aboriginal Affairs and Northern Development Canada (AANDC). Handbook of Reclamation Techniques in the Yukon, (1999).

Alaska Department of Environmental Conservation and Alaska Energy Authority. Burning Garbage and Land Disposal in Rural Alaska, (2004).

http://www.akenergyauthority.org/AEAdocuments/BurningGarbage.pdf

Canadian Council of Ministers of the Environment (CCME). Canada-Wide Standards for Dioxins and Furans Emissions from Waste Incinerators and Coastal Pulp and Paper Boilers, (2001). http://www.ccme.ca/assets/pdf/d and f standard e.pdf

Canadian Council of Ministers of the Environment (CCME). Canada-Wide Standards for Mercury Emissions from Base-Metal Smelters and Waste Incinerators, (2000). http://www.ccme.ca/assets/pdf/mercury_emis_std_e1.pdf

Canadian Council of Ministers of the Environment (CCME). National Guidelines for Hazardous Waste Incineration Facilities – Design and Operating Criteria, (1992).

http://www.ccme.ca/assets/pdf/pn 1076 e.pdf

Canadian Council of Ministers of the Environment (CCME). Operating and Emission Guidelines for Municipal Solid Waste Incinerators, (1989).

http://www.ccme.ca/assets/pdf/pn 1085 e.pdf

Canadian Council of Ministers of the Environment (CCME). Provisional Code of Practice for the Management of Post Use Treated Wood, (1996).

http://www.ccme.ca/assets/pdf/pn_1227_e.pdf

Environment Canada (EC). Protocols and Performance Specifications for Continuous Monitoring of Gaseous Emissions from Thermal Power Generation. Report EPS 1/PG/7, (1995).

http://www.ec.gc.ca/Publications/844D7CF3-2F1D-4CA0-9290-

<u>0A885806F792/ProtocolsandPerformanceSpecs.pdf</u>

Environment Canada (EC). Operation of a Modified Burn Barrel for the Destruction of Food Waste in Remote Locations: Observational Summary. Report ERMS 2011-01.

Environment Canada (EC). Technical Document for Batch Waste Incineration, (2009). http://www.ec.gc.ca/gdd-mw/default.asp?lang=En&n=F53EDE13-1

Government of Nunavut, Department of Environment. Environmental Guideline for General Management of Hazardous Waste, (2010).

http://env.gov.nu.ca/node/82#Guideline Documents

Government of Nunavut, Department of Environment. Environmental Guideline for Industrial Waste Discharges into Municipal Solid waste and Sewage Treatment Facilities, (2011).

http://env.gov.nu.ca/node/82#Guideline Documents



APPENDIX 1 - ENVIRONMENTAL PROTECTION ACT

The following are excerpts from the Environmental Protection Act

- 1. "Contaminant" means any noise, heat, vibration or substance and includes such other substance as the Minister may prescribe that, where discharged into the environment,
 - (a) endangers the health, safety or welfare of persons,
 - (b) interferes or is likely to interfere with normal enjoyment of life or property,
 - (c) endangers the health of animal life, or
 - (d) causes or is likely to cause damage to plant life or to property;

"Discharge" includes, but not so as to limit the meaning, any pumping, pouring, throwing, dumping, emitting, burning, spraying, spreading, leaking, spilling, or escaping;

"Environment" means the components of the Earth and includes

- (a) air, land and water,
- (b) all layers of the atmosphere,
- (c) all organic and inorganic matter and living organisms, and
- (d) the interacting natural systems that include components referred to in paragraphs (a) to (c).

"Inspector" means a person appointed under subsection 3(2) and includes the Chief Environmental Protection Officer.

2.2 The Minister may

- (a) establish, operate and maintain stations to monitor the quality of the environment in the Territories;
- (b) conduct research studies, conferences and training programs relating to contaminants and to the preservation, protection or enhancement of the environment;
- (c) develop, co-ordinate and administer policies, standards, guidelines and codes of practice relating to the preservation, protection or enhancement of the environment;
- (d) collect, publish and distribute information relating to contaminants and to the preservation, protection or enhancement of the environment:
- 3. (1) The Minister shall appoint a Chief Environmental Protection Officer who shall administer and enforce this Act and the regulations.
 - (2) The Chief Environmental Protection Officer may appoint inspectors and shall specify in the appointment the powers that may be exercised and the duties that may be performed by the inspector under this Act and regulations.
- 5. (1) Subject to subsection (3), no person shall discharge or permit the discharge of a contaminant into the environment.
 - (3) Subsection (1) does not apply where the person who discharged the contaminant or permitted the discharge of the contaminant establishes that
 - (a) the discharge is authorized by this Act or the regulations or by an order issued under this Act or the regulations;
 - (b) the contaminant has been used solely for domestic purposes and was discharged from within a dwelling house;
 - (c) the contaminant was discharged from the exhaust system of a vehicle;

- (d) the discharge of the contaminant resulted from the burning of leaves, foliage, wood, crops or stubble for domestic or agricultural purposes;
- (e) the discharge of the contaminant resulted from burning for land clearing or land grading;
- (f) the discharge of the contaminant resulted from a fire set by a public official for habitat management of silviculture purposes;
- (g) the contaminant was discharged for the purposes of combating a forest fire;
- (h) the contaminant is a soil particle or grit discharged in the course of agriculture or horticulture; or
- (i) the contaminant is a pesticide classified and labelled as "domestic" under the *Pest Control Products Regulations* (Canada).
- (4) The exceptions set out in subsection (3) do not apply where a person discharges a contaminant that the inspector has reasonable grounds to believe is not usually associated with a discharge from the excepted activity.
- 5.1. Where a discharge of a contaminant into the environment in contravention of this Act or the regulations or the provisions of a permit or license issued under this Act or the regulations occurs or a reasonable likelihood of such a discharge exists, every person causing or contributing to the discharge or increasing the likelihood of such a discharge, and the owner or the person in charge, management or control of the contaminant before its discharge or likely discharge, shall immediately:
 - (a) subject to any regulations, report the discharge or likely discharge to the person or office designated by the regulations;
 - (b) take all reasonable measures consistent with public safety to stop the discharge, repair any damage caused by the discharge and prevent or eliminate any danger to life, health, property or the environment that results or may be reasonably expected to result from the discharge or likely discharge; and
 - (c) make a reasonable effort to notify every member of the public who may be adversely affected by the discharge or likely discharge.
- 6. (1) Where an inspector believes on reasonable grounds that a discharge of a contaminant in contravention of this Act or the regulations or a provision of a permit or license issued under this Act or the regulations has occurred or is occurring, the inspector may issue an order requiring any person causing or contributing to the discharge or the owner or the person in charge, management or control of the contaminant to stop the discharge by the date named in the order.
- 7. (1) Notwithstanding section 6, where a person discharges or permits the discharge of a contaminant into the environment, an inspector may order that person to repair or remedy any injury or damage to the environment that results from the discharge.
 - (2) Where a person fails or neglects to repair or remedy any injury or damage to the environment in accordance with an order made under subsection (1) or where immediate remedial measures are required to protect the environment, the Chief Environmental Protection Officer may cause to be carried out the measures that he or she considers necessary to repair or remedy an injury or damage to the environment that results from any discharge.

APPENDIX 2 – MODIFIED BURN BARREL DESIGN AND SPECIFICATIONS

A modified burn barrel is typically constructed from a 45 gallon metal fuel or oil drum. The modifications result in greater heat generation and retention, better mixing of the waste with incoming air and longer holding time inside the barrel. Together, these modifications result in more complete combustion of the solid waste than does open burning on the ground or in a pit.

Placing a metal screen over the top of the exhaust pipe may be required to prevent sparks and hot ash from escaping. Care should be taken to ensure the screen does not become blocked with soot.





A stove pipe attached to the top of the barrel allows smoke to escape and creates an effective draft.



A hinged top helps to capture heat and enables easy loading and mixing of waste.



A metal basket or grate suspends the burning waste and enables mixing with the incoming air. The removable basket also enables access to any unburned ash that may collect in the bottom of the barrel.

Evenly spaced vents or holes cut above the bottom of the barrel enable fresh air to mix with waste inside the metal basket.

