Environmental Protection Operations Directorate (EPOD) Prairie and Northern Region (PNR) Qimugjuk Building P. O. Box 1870 Igaluit, NU X0A 0H0

January 27th, 2014

EC file: 6100 000 054 /011 NWB file: 2BE-HAK0915

Via: phyllis.beaulieu@nwb-oen.ca

Phyllis Beaulieu Manager of Licensing Nunavut Water Board P.O. Box 119 Cambridge Bay, NU X0B 0C0

RE: Glencore Hackett River - Request for Open Burning

Environment Canada (EC) has reviewed the information submitted to the Nunavut Impact Review Board (NIRB) regarding the above-mentioned project proposal and is submitting comments on mitigation measures as well as other matters of importance to the project proposal as requested by the NIRB. EC's specialist advice is provided pursuant to the *Canadian Environmental Protection Act 1999*, the pollution prevention provisions of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

For further clarification on any aspect of the submission, please contact me at (867) 975-4636 or john.price@ec.gc.ca.

Sincerely,

John Price Environmental Assessment Officer

cc: Carey Ogilvie, Head, Environmental Assessment North (NT & NU), EPOD-PNR, EC Michael Mohammed, Senior Environmental Assessment Coordinator, EPOD-PNR, EC Dave Fox, Air Quality Specialist, Sector Support, EC



Glencore is applying to the Nunavut Water Board to allow for controlled open burning of approximately 100m³ of untreated wood products and occasionally cardboard at the Hackett River project camp. This material is either too large for the existing incinerator at Hackett camp or is of a significant volume that it exceeds the operating capacity of the existing incinerator.

In principal, EC does not encourage the open burning of wood waste as a means of disposal. However, considering the incinerator capacity constraints at the Hackett camp, EC recommends the Proponent consider the following guidance:

- Solid wastes that are conditionally suitable for open burning are paper products, paperboard packaging and untreated wood. Plywood, painted wood or other treated wood should not be disposed of in this manner. For reference, below are links to the Nunavut Municipal Open Burning Policy & EC information regarding Open Burning respectively:
 - a) http://www.gov.nu.ca/env/Open%20burning.pdf
 - b) http://www.ec.gc.ca/gdd-mw/684B44DD-5780-4F73-BC58-497E31A19EDC/COM1170 Open_Burning_Brochure_e_v6_for%20web.pdf
- EC recommends that all associated non-combustible structure waste (i.e. plastics, tar paper, floor coverings, shingles, insulation, wiring and tents) be thoroughly removed prior to burning.
- 3. EC recommends that all residual waste from the burning (i.e. nails and coals) be thoroughly collected, removed from site, and disposed of at a suitable facility.

