

File No. 2BE-HAK0915

January 4, 2014

Robert Prairie Glencore Canada Corporation Director, Environment 8801 Transcanadienne, Suite 400 St. Laurent, Québec, H4S 1Z6 Robert.Prairie@glencore-ca.com (514)-745-9365

RE: Licence No. 2BE-HAK0915, Type "B", Glencore Canada Corporation; Request to Carry Out Opening Burning of Acceptable Materials

Dear Mr. Prairie:

Glencore Canada Corporation (Glencore) submitted a request to the Nunavut Water Board (NWB) on October 1, 2013 to carry out controlled open burning of approximately 100 m<sup>3</sup> of acceptable materials (e.g. untreated materials such as paper, cardboard, and wood) at the Hackett River Project Camp site, without the use of an incinerator. On January 6, 2014, the NWB acknowledged receipt of the request and distributed the request to interested persons and parties for a twenty-one (21) day review period. Comments were received from Aboriginal Affairs and Northern Development Canada (AANDC), Environment Canada (EC), and the Kitikmeot Inuit Association (KIA) on January 22, 2014, and January 27, 2014, respectively.

Upon review of the request, supporting documentation, the terms and conditions in Licence 2BE-HAK0915 (Licence) and submissions from interested persons and/or parties, the NWB is satisfied that the activity, as proposed by the Licensee, would not directly or indirectly impact surface water and groundwater, which is a requirement under Section 12.1(a)(b) of the *Nunavut Waters and Nunavut Surface Rights Tribunal Act*, and maintain its obligations to adhere to the terms and conditions in the Licence. The NWB has therefore approved the request under Board Motion No. 2013-B1-050, dated February 3, 2014, for the open burning of approximately 100 m<sup>3</sup> of untreated and unpainted wood materials over the course of 2014, as per the conditions detailed in this letter.

The Licensee is obligated to provide a minimum of ten (10) days notification to the AANDC Inspector (867-975-4295) in advance of any open burning event. This notification must detail the following:

- a. Quantity and details of waste to be burned;
- b. Proposed dates of open burning event;

- c. Protocol to be followed for open burning; and
- d. Person responsible for carrying out the burn.

Note that soil sampling may also be required at the Inspector's discretion. The Licensee is reminded of its obligations to comply with all of the terms and conditions in its Licence as well as all applicable regulations and established guidelines <sup>1, 2, 3, 4</sup>, which apply to open burning in Nunavut. The Licensee is further obligated to follow the best practices for open burning that are detailed in Appendix A. A report of the open burn event and the burn site cleanup, including photos of the site, must be included in the Annual Report (i.e. for every year that open burning has been authorized) required under Part B, Item 2 of the Licence.

Should you have any questions, please feel free to contact the undersigned at (867) 360-6338 (ext. 29) or by e-mail at cory.zyla@nwb-oen.ca.

Yours truly,

Original Signed By:

## Cory Zyla

Technical Advisor Nunavut Water Board

Cc: Distribution List – Kitikmeot

<sup>&</sup>lt;sup>1</sup> Guidelines for the Planning, Design, Operations and Maintenance of Modified Solid Waste Sites in the NWT, Ferguson Simek Clark Engineers & Architects, FSC.

<sup>&</sup>lt;sup>2</sup> CCME, Canada-Wide Standards for Dioxins and Furans: http://www.ccme.ca/assets/pdf/d\_and\_f\_standard\_e.pdf

<sup>&</sup>lt;sup>3</sup> EC, Technical Document for Batch Waste Incineration: <a href="http://www.ec.gc.ca/gdd-mw/default.asp?lang=En&n=F53EDE13-1">http://www.ec.gc.ca/gdd-mw/default.asp?lang=En&n=F53EDE13-1</a>

<sup>&</sup>lt;sup>4</sup> GN DOE, Environmental Guideline for the Burning and Incineration of Solid Waste:



## APPENDIX A. BEST PRACTICES FOR OPEN BURNING

The following best practices shall be implemented when carrying out open burning activities under this approval:

- a. The Licensee shall follow the Government of Nunavut's policy on the open burning of segregated wastes, and shall not allow the open burning of plastics, wood treated with preservatives, electrical wire, Styrofoam, asbestos or painted wood;
- b. Solid wastes that are conditionally suitable for open burning shall be limited to paper products, paperboard packaging, and untreated wood wastes;
- c. Wood and other acceptable products shall be kept as dry as possible before and during burning;
- d. The size of the burn pile shall be minimized, and a "**hot burn**" maintained to create an efficient burn using consistent/constant feed rates to avoid over-feeding and damping the fire;
- e. Burning shall only be undertaken during favorable weather conditions (i.e. will not be undertaken during periods of extreme wind or during wet rain conditions);
- f. Fires shall be completely extinguished to ensure that any smoldering of material does not persist;
- g. Burning practices shall minimize the scorching of the ground;
- h. Burning practices shall minimize impacts to surface or groundwater;
- i. Burning shall only occur within a confined area (e.g. within a cage or a ventilated burn box);
- j. Any residual waste and/or ashes shall be collected and disposed of as per incinerator ash after every burn, in an appropriate and approved facility; and
- k. Surface water runoff from the burn areas shall be managed to prevent any direct or indirect flow into a water body and no additional impacts to water shall be created.