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NUNAVUT WATER BOARD  
NUNAVUT IMALIRIYIN KATIMAYINGI  
OFFICE DES EAUX DU NUNAVUT

**File No.: 2BE-HIG1217/TR/D2  
2BE-IZO1217/TR/D2**

March 25, 2015

Ted Muraro  
Operations Manager – Exploration Canada  
MMG Resources Inc.  
Level 26, 1177 West Hastings Street  
Vancouver, BC V6E 2K3  
E-mail: [Theodore.Muraro@MMG.com](mailto:Theodore.Muraro@MMG.com)

**RE: Licenses No. 2BE-HIG1217 and 2BE-IZO1217, Type “B”, MMG Resources Inc.;  
Request to Carry out Open Burning of Acceptable Materials.**

Dear Mr. Muraro:

The Nunavut Water Board (“NWB”) received on January 14, 2015 a request from MMG Resources Inc. (MMG) to complete controlled open burning, at High Lake Camp at the High Lake Project and Ham Lake Camp at the Izok Project, of acceptable materials (untreated wood materials such as paper, cardboard and wood), without the use of an incinerator. It was stated that proposed activities are related to the “*complete removal and closure of High lake East Camp on the James River at High Lake Project, as well as to the continued reduction and reclamation around the both the historic High Lake site and the Izok site (Ham Lake Camp)*”.

On February 18, 2015, the NWB acknowledged receipt and distributed the request to interested persons and parties for a thirty (30) day review period. Comments were received from Aboriginal Affairs and Northern Development Canada (AANDC) and Environment Canada (EC) on March 18, 2015, and from Kitikmeot Inuit Association (KIA) on March 4, 2015.

Upon review of the request, supporting documentation, terms and conditions in Licenses No. 2BE-HIG1217 and 2BE-IZO1217, 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 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 licenses. The NWB has, therefore, approved the request under motions No. 2014-B1-042 and 2014-B1-043, dated March 25, 2015, for an open burning of untreated and unpainted wood materials to be carried out in summer 2015 (or over the course of 2015).

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.

It should be noted 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. In addition, the NWB has included as Appendix A, a summary of additional practices for carrying out the activity. 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. 30 or by email at [karen.kharatyan@nwb-oen.ca](mailto:karen.kharatyan@nwb-oen.ca), at your earliest convenience.

Yours truly,

Karén Kharatyan  
Technical Advisor

Cc: Distribution List – Kitikmeot

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1 Guidelines for the Planning, Design, Operations and Maintenance of Modified Solid Waste Sites in the NWT, Ferguson Simek Clark Engineers & Architects, FSC

2 CCME Canada-Wide Standards for Dioxins and Furans: [http://www.ccme.ca/assets/pdf/d\\_and\\_f\\_standard\\_e.pdf](http://www.ccme.ca/assets/pdf/d_and_f_standard_e.pdf)

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

4 GN DOE Environmental Guideline for the Burning and Incineration of Solid Waste: <http://www.gov.nu.ca/env/Open%20burning.pdf>

## APPENDIX A – PRACTICES FOR OPEN BURNING

The NWB highlights several key items of this approval for carrying out of the activities, which include:

- a. The Licensee 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 are paper products, paperboard packaging and untreated wood wastes only;
- c. Wood and other acceptable products will be kept as dry as possible before and during burning;
- d. The size of the burn pile will 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 will 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 will 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 approved facility; and
- k. Surface water runoff from the Burn pit areas shall be managed to prevent any direct or indirect flow into a water body and that no additional impacts to water are created.