



Our reference
CIDM# 1243906

March 11, 2019

NWB reference
2BE-IZO1823

Richard Dwyer
Manager of Licensing
Nunavut Water Board
Gjoa Haven, NU, X0E 1J0

Re: 2BE-IZO1823 – Request for Open Burning – Izok Lake – MMG Limited (MMG).

Please be advised that Crown-Indigenous Relations and Northern Development Canada (CIRNAC) have completed a review of the request for open burning for water license 2BE-IZO1823 (Izok Lake) submitted by MMG. The NWB circulated the request for open burning for comments on February 25, 2019. All documents related to the request posted on the NWB ftp site under 2BE-IZO1823 were included in the review (See attached Technical Review Memo).

Should you have any questions or comments, please do not hesitate to contact me at (867) 222-9278 or by email at ian.parsons@canada.ca.

Sincerely,

Ian Parsons
Regional Coordinator



Technical Review Memorandum

Re: 2BE-IZO1823 – Request for Open Burning – Izok Lake – MMG Limited (MMG).

Background

The Izok lake project is located in the Kitikmeot Region of Nunavut. MMG currently has facilities and infrastructure to support the running of an advanced exploration drilling operation. However, at this time, there is no drilling taking place and MMG is concentrating its efforts on doing some maintenance work, at site, to reduce its project footprint. (i.e open burning).

Recommendations/Comments

After reviewing the licensee's request for open burning CIRNAC has the following recommendations:

First CIRNAC recommends that the licensee both try and re-use these products or, if this is not possible, removal off site of all waste products and supplies to an appropriately approved waste management facility rather than burning.

However, in the event that reuse or removal cannot be accomplished, CIRNAC is not opposed to a limited and effective open burn with the following recommendations:

1. Burning should be conducted in compliance with GN Environmental Guideline for the Burning and Incineration of Solid Waste (2012) *(or the Appendix A Practices as currently issued)*
2. Other considerations when open burning include, but are not limited to:
 - a) Only wood products that have **not** been treated in any form shall be burned.
 - b) No treated wood or wood products, plywood or any other material treated or contaminated with petroleum based products should be burned.
 - c) All non-combustible materials associated with the waste wood (i.e., plastics, tar paper, floor coverings, shingles, insulation, wiring, and tents) shall be thoroughly **removed** prior to the burning of the waste wood
 - d) The products mentioned in (a) above shall be in a size that is manageable and will ensure that a complete burn of the product(s) will occur.



- e) The burn shall remain in a **‘hot phase’ or ‘hot burn’** until complete combustion of the product(s) has taken place and no unburned wood debris is left over. Air assistance to the fire should be considered to improve complete combustion of the waste.
3. Burning should only occur within a confined area (e.g.: – within a cage or a ventilated burn box);
 4. Burning practices should minimize scorching of the ground;
 5. Burning practices should minimize impacts to surface or groundwater;
 6. 10-day notification to be provided to the Inspector which includes the following:
 - a. Quantity and details of waste to be burned
 - b. Proposed dates
 - c. Protocol to be followed for open burning
 - d. Person responsible for carrying out the burn; and
 7. A report of burn site cleanup with photos is to be provided in the Annual Report (every year open burning is permitted).
 8. After the burn is complete, any ash or other residual debris (i.e nails) found shall be collected and and disposed of as per incinerator ash after every burn
 9. Little evidence should remain that a fire occurred at the chosen location.
 10. Soil sampling may also be required at the inspector’s discretion.

CIRNAC also reminds the licensee that under the water licence, the licensee is obligated to prevent the deposition of waste materials from the combustion of and/or leachate from contaminated ash residual from entering and impacting any surrounding waters either directly or indirectly.

CIRNAC advises the licensee to contact the land owner (CIRNAC for crown land and Regional Inuit Association for Inuit Owned Land) to acquire the proper approval/permits for the activity.