



Water Resources
Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence
2BE-IZO1217

June 11, 2013

Our file - Notre référence
CIDM# 690980

Phyllis Beaulieu
Manager, Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0A 1J0

Re: 2BE-IZO1217 – Camp Reclamation – Open Burning – Ham Lake (IZOK)

Dear Phyllis Beaulieu:

Please be advised that Aboriginal Affairs and Northern Development Canada (AANDC) have completed a review of the request for open burning for water license 2BE-IZO1217 (Ham Lake) submitted by MMG Resources Inc. ("MMG" or the "Proponent"). The Nunavut Water Board ("NWB" or the "Board") circulated the request for open burning for comments on May 15, 2013. All documents related to the request posted on the NWB ftp site under 2BE-IZO1217 were included in my review (See attached Technical Review Memo).

Should you have any questions or comments, please do not hesitate to contact me at (867) 975-4568 or by e-mail at Rory.MacDonald@aandc-aadnc.gc.ca

Regards,

Sent via Email

Rory MacDonald
Water Resources Technician

Cc. David Abernethy, A/Manager of Water Resources, AANDC
Erik Allain, Manager of Field Operations, AANDC



Technical Review Memorandum

To: Phyllis Beaulieu – Manager of Licensing, Nunavut Water Board

From: Rory MacDonald – Water Resources Technician, AANDC

Existing Water Licence: 2BE-IZO1217

Re: 2BE-IZO1217 – Camp Reclamation – Open Burning – Ham Lake (IZOK)

1. Project Description

The Izok Corridor Project is located in the Kitikmeot Region of Nunavut approximately 250km southeast of the Hamlet of Kugluktuk. Initially explored in the 1970's for base metals and explored historically throughout the 1980-2000's, the project camp consisted of 13 Travco trailers located along the Shore of Ham Lake. The camp trailers were installed in the 1980's by the former project owner Inmet Resources Inc.

MMG is requesting to reclaim the trailer camp which involves dismantling the trailers (e.g. breaking down all interior finishing's, removing windows, removing sheet metal siding, and removal of all other non-combustible wastes). In addition MMG is requesting authorization to open burn un-treated lumber under strict supervision and in a controlled location. All other wastes (i.e. non-combustibles) will be transported from site via air to Yellowknife, NWT for proper disposal.

2. Results of Review and Recommendations

AANDC Water Resources Division offers the following comments and recommendations for the Board's consideration.

A. General

Under MMG's active Land Use Permit (N2012C0005) open burning of any materials is prohibited. Pursuant to Part D, Item 2 of the current Water Licence (2BE-IZO1217) "the Licensee shall not practice open burning or on site land filling of domestic waste, unless otherwise approved by the Board."

AANDC recommends that the open burning of wood waste not be encouraged and as an alternative method, MMG should re-use products, or remove all wastes off-site to an approved facility. As per Environment Canada's Technical Document for Batch Waste Incineration (January 2010) there are concerns that the appropriate temperatures for a clean and effective burn will not be achieved which poses a threat to the environment involving Dioxins, Furan's, Nitrogen Oxides and Polycyclic Aromatic Hydrocarbons (PAH's).

In the event that reuse or removal cannot be accomplished, and the NWB authorizes on-site open burning, AANDC has the following recommendations:

1. Only wood products that have **not** been treated in any form shall be burned.
2. No treated wood or wood products, plywood or any other material treated or contaminated with petroleum based products should be burned.
3. 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



4. The products mentioned in (1) above shall be in a size that is manageable and will ensure that a complete burn of the product(s) will occur.
5. 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.
6. After the burn is complete, any ash or other residual debris (i.e. nails) found shall be cleaned up and disposed of in an appropriate matter.
7. Little evidence should remain that a fire occurred at the chosen location.
8. Soil sampling may also be required at the inspector's discretion.

AANDC would like to remind the Proponent that if approval for open burning is granted by the NWB, then strict adherence to the conditions of issuance is required. AANDC Inspectors will include open burning permits in their site inspection to ensure compliance.

AANDC would like to reiterate that open burning is not encouraged and that any and all other methods for the re-use and/or disposal of the wood waste products should be investigated.