



Water Resources Division
Nunavut Regional Office
Iqaluit, NU
X0A 0H0

NWB File: 3BC-BAF0919
CIDMS #: 598686

Sept 27, 2012

Re: 3BC-BAF0919 – Request for Open Burning – BAF – 3 Brevoort Island – North Warning System.

Please be advised that Aboriginal Affairs and Northern Development Canada (AANDC) have completed a review of the request for open burning for water license 3BC-BAF0919 (Brevoort Island) submitted by North Warning System. The NWB circulated the request for open burning for comments on Aug 28, 2012. All documents related to the request posted on the NWB ftp site under 3BC-BAF0919 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) 975-4282 or by email at Ian.Parsons@aandc-aadnc.gc.ca.

Sincerely,

Original signed by

Ian Parsons
Regional Coordinator

Cc. Murray Ball, Manager of Water Resources – AANDC, Nunavut Regional Office



Technical Review Memorandum

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

From: Ian Parsons – Regional Coordinator, AANDC.

Re: 3BC-BAF0919 – Request for Open Burning – BAF – 3 Brevoort Island – North Warning System.

Background

The Brevoort Island BAF-3 site is located approximately 200km East of Iqaluit in the Nunavut Territory. It is an unmanned Long Range Radar Station for the North Warning System. The site is visited by staff, quarterly, for preventative and maintenance requirements. Between the months of May-September the site may return to manned status.

Recommendations/Comments

First, AANDC would like to state that the burning of wood waste as a form of disposal is not encouraged. Open burning has the potential to produce dioxins, furan's and polycyclic aromatic hydrocarbons (PAH's).

In this regard AANDC has the following concerns:

1) Low Temperature Burn.

Open burning is likely to be a low temperature burn that produces toxic by-products. This is a particular concern when burning large volumes of wood waste.

2) Quality Control and Quality Assurance

In the past, proponents who have been granted open burning requests have shown AANDC that in almost all cases that there is a lack of Quality Control and Quality Assurance and that non-burnable products have entered the open burn, creating greater potential for toxic by-products.



3) Clean up

There is no compliance mechanism to demonstrate that any open burn area will be adequately cleaned up. Residuals may pose a future risk to water quality.

AANDC recommends that it is good practice for proponents to develop plans for removal of wood products and supplies as part of logistics planning for the operations in remote locations.

AANDC therefore recommends either the re-use of products or, if this is not possible, the removal, off site, of all waste products and supplies to an appropriately approved facility rather than burning. In the case of the large volume of pallets on site at the end of the season, and where removal is problematic, incineration is a preferable option over open burning.

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.

Cc. Murray Ball, Manager of Water Resources – AANDC, Nunavut Regional Office
Andrew Keim, A/Manager – AANDC, Nunavut Regional Office