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EC file: 4517 000 001
4105 006 154

NWB file: 3BC-BAF0919
3BC-DYE0919

Via email: licensing@nunavutwaterboard.org

RE: 120828 3BC-BAF0919 and 3BC-DYE0919 Request for Open Burning – Qikiqtani Region

Environment Canada (EC) has reviewed the information submitted with the above-mentioned request as submitted to the Nunavut Water Board (NWB). The following specialist advice has been provided pursuant to the *Canadian Environmental Protection Act 1999*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

The Department of National Defense is requesting permission from the NWB to allow for the open and controlled burning of caches of accumulated, untreated wood at the Brevoort Island and Cape Dyer radar sites, BAF-3 and DYE-M respectively, during September and October 2012. The wood items involve include approximately 5 tons of untreated pallets and old crates at the Brevoort Island site and a lesser amount at Cape Dyer. Burning will occur in pits and ash and remaining nails will be covered when the pits are filled in. The rationale behind this request is the material is too large for the on-site incinerator and would require an excessive amount of effort to break it down or to ship it out.

Based on a review of the request, EC provides the following comments for the NWB's consideration:

- In principal, EC does not encourage the open burning of wood waste as a means of disposal. However, considering the incinerator capacity constraints at these sites, EC recommends the proponent heed the following guidance:
 - Solid wastes that are conditionally suitable for open burning are paper products, paperboard packaging and untreated wood. Plywood, painted wood or other treated wood should not be disposed of in this manner.
For reference, below is a link to the Nunavut Municipal Open Burning Policy:
<http://www.gov.nu.ca/env/Open%20burning.pdf>
and below is a link to information from EC regarding open burning:
<http://www.ec.gc.ca/gdd-mw/default.asp?lang=En&n=684B44DD-1>
 - EC recommends that all non-combustible associated structure waste (i.e., any plastics or non-pallet waste) be thoroughly removed prior to burning
 - EC recommends that all residual waste from the burning (i.e. nails and coals) be thoroughly collected, removed from site, and disposed of at a suitable facility rather than buried, as mentioned in the proponent's request to the NWB.

Comments previously submitted on behalf of EC regarding water licenses 3BC-BAF0919 and 3BC-DYE0919 would still apply to these projects. If there are any additional proposed changes to

the projects or the open burning request EC should be notified, as further review may be necessary. Please do not hesitate to contact the undersigned with any questions or comments with regards to the foregoing at (867) 975-4631 or by email at Paula.C.Smith@ec.gc.ca.

Regards,



Paula C. Smith
Environmental Assessment Coordinator

cc: Carey Ogilvie (Head, Environmental Assessment-North, EPO, Yellowknife, NT)