



An ATCO Frontec and Pan Arctic Inuit Company

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13 June 2008

Nunavut Water Board
P.O. Box 119
Gjoa Haven, Nunavut
X0B 1J0

Attention: Ms. Phyllis Beaulieu, Manager of Licensing

Subject: **Recommendment of Burning At NWS Sites**

References:

A	License NWB6CAM0409 – Type “B”, CAM-MAIN, Cambridge Bay;
B	License NWB6SHE0409 – Type “B”, CAM-3, Shepherd Bay;
C	License NWB6FOH0409 – Type “B”, FOX-MAIN, Hall Beach;
D	License NWB6FOD0409 – Type “B”, FOX-3, Dewar Lakes;
E	License NWB6DYE0409 – Type “B”, DYE-MAIN, Cape Dyer; and
F	License NWB6BAF0409 – Type “B”, BAF-3, Brevoort Island

Dear Ms. Beaulieu:

The North Warning System (NWS) has six (6) water licenses, References “A” through “F” above. With the exception of CAM-M, where domestic waste is disposed of locally in Cambridge Bay, we have routinely conducted open burning of domestic waste at the remaining five (5) sites, with the ash being land filled. The practice of burning was primarily to reduce the quantity of garbage being land filled, thus extending the life of the land fill and unduly attracting wildlife to the site. However, during the summer of 2007, INAC conducted audits of the licenses for four (4) of these sites (FOX-M, FOX-3, DYE-M and BAF-3), and passed direction to Nasittuq Corporation (“Nasittuq”) to cease open burning of domestic waste, as this was deemed to be in contravention of the license.

A review of our application showed that although it stated solid waste was to be burnt in a burn bin, with the ash buried in an on-site landfill (Exploration/Remote Camp Supplementary Questionnaire, Waste Treatment and Disposal, Item 32, Page 5), the license issued does in fact call for incineration. Further, it was the inspector’s follow-up written comment that an approved incinerator must be used, which meets or exceeds the Canada-wide Standards for Dioxins and Furans and the Canada-wide Standard for Mercury Emissions.

Nasittuq acknowledges that none of the six (6) sites have such an incinerator and that during the fall and winter of 2007 and into the spring of 2008 we have complied with the inspector’s directive. As noted above, for CAM-MAIN, we have for some time disposed of our waste locally in Cambridge Bay. Up to now, waste disposal at the remaining five (5) sites has not been an issue. These sites are unattended for the majority of the fall, winter and spring, and are re-attended or “ramped-up” for an extended duration of the summer for preventive and corrective

maintenance, and for periodic project work. Therefore, during the period when the sites are unattended, there is minimal waste generated.

However, we currently have BAF-3 ramped-up as part of the second year of a multi year effort to clean-up a fuel spill that was discovered in January 2007. The site population fluctuates on a weekly basis between fifteen (15) and twenty (20) people, and will remain at this level through to the end of September 2008. To date, we have been flying the domestic waste back to Iqaluit for local disposal by the town. Anecdotally, we are reasonably certain that the waste taken back to Iqaluit is being burnt as opposed to incinerated by the community. Nasittuq believes that the storing of this amount of garbage on site is a health and safety issue. Given that the majority of our staff are working outside on the spill clean-up, we feel that we cannot store this waste outdoors, as it will likely attract wildlife, particularly polar bears. While Nasittuq does employ bear monitors, we feel that storing garbage outside will only increase the risk of an encounter. Therefore, we have been storing this waste inside the building, which has only served to create a different but direct risk to the health and safety of those on site. Further, the garbage has been removed during the weekly re-supply flight. In addition to the flight crew, with the movement of personnel, there are normally passengers leaving the site on this flight. The movement of this waste back to Iqaluit similarly poses a risk to health and safety of those on the aircraft. While this is an immediate concern for BAF-3, we have plans to ramp-up the remaining three (3) unattended sites during the course of the summer, and we anticipate similar health and safety concerns experienced at BAF-3.

As a result, although we have tried to comply with the inspector's interpretation of the license, we are advising you that, due to the health and safety concerns for our staff and subcontractors, we have recommenced on site burning of domestic waste. We believe that health and safety of those living on site must take precedent.

We trust you understand our reasons for taking this action. Should you have any questions or comments, please contact Mr. Scott Charland at (613) 787-9626.

Yours sincerely,

NASITTUQ CORPORATION



Jacques Plante
Vice President, Nasittuq Corporation

cc: Sr. Manager, P&D, Sr. Manager, Maintenance, Sr. Manager Contracts and Supply Chain, President,
Kim Kalen, R&CS 3-4 and Contracts