



Robin Ikkutisluk

Licensing Administrator

Nunavut Water Board

P.O. Box 119

Gjoa Haven, NU X0B 1J0

Dear Ms. Ikkutisluk:

December 16, 2020

Project #

60638794

**Subject: DRAFT Nunavut Water Board Type 'B' Water Licence No. 8BC-EUR1621  
Amendment Request – Waste Burn Request**

On behalf of Environment and Climate Change Canada (ECCC), we would like to request an amendment to the Water Licence No. 8BC-EUR1621 issued for the Eureka High Arctic Weather Station (HAWS), located on Ellesmere Island within the Oikiqtani Region, Nunvut.

The request is to amend the sections detailed below:

**Waste Disposal**

Under **Part D: Conditions Applying to Waste Disposal, item 2**, *"The Licensee is authorized to dispose of all acceptable food waste, paper waste and untreated wood products in an incinerator."*

There will be untreated and unpainted wood (dimension boards, timbers and plywood) that would be suitable to burn, which are free of contaminants and debris, resulting from project activities at the HAWS site. The above condition authorizes burning of this wood in an incinerator; however, we would like to request permission to burn the untreated and unpainted wood in an open container suitable to contain the ash and sampling the ash to determine disposal requirements. We anticipate the burning to occur between late summer 2021 and late summer 2023.

The reasons we are requesting permission to burn untreated and unpainted wood are as follows:



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- An incinerator (forced-air, fuel-fired) is currently approved for burning combustible wastes generated on site. The incinerator is not designed to burn large pieces of wood. Also, the burning of diesel fuel to incinerate the wood is unnecessary. Therefore, burning the wood outside of an incinerator would allow large pieces to be burned in a controlled manner and eliminate the unnecessary burning of fossil fuels.
- Wood placed into the on-site non-hazardous landfill will eventually degrade, which could potentially impact the structural integrity of the landfill. Therefore, avoiding the disposal of wood wastes within the landfill will reduce potential adverse impacts to the landfill integrity.
- Shipping the wood off site would result in expenditure of additional fossil fuels and avoidance of this is preferred.

Burning the wood in a controlled manner, as described above, is not expected to have long term environmental impacts to the area.

Should you have questions or comments, please contact, Robin Reese at AECOM Canada Ltd. at your convenience:

Robin Reese, M.E.Des., P.Biol., RPBio

Technical Lead, Project Manager

T: +1-587-436-6058

E: [robin.reese@aecom.com](mailto:robin.reese@aecom.com)

Sincerely,

**Environment and Climate Change Canada (ECCC)**



Jean-Philippe Cloutier-Dussault  
Technical Services, Property Manager

T: +1-514-283-4045

E: [jean-philippe.cloutier-dussault@canada.ca](mailto:jean-philippe.cloutier-dussault@canada.ca)