



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

NWB File: 2BE-GEO1015  
CIDMS #: 521121

Apr 10, 2012

**Re: 2BE-GEO1015 – Request for Open Burning – George Lake – Sabina Gold and Silver Corporation (Sabina).**

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-GEO1015 (George Lake) submitted by Sabina Gold and Silver Corp. The NWB circulated the request for open burning for comments on Mar 12, 2012. All documents related to the request posted on the NWB ftp site under 2BE-GEO1015 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@aadnc-aadnc.gc.ca](mailto:Ian.Parsons@aadnc-aadnc.gc.ca).

Sincerely,

*Original signed by*

Ian Parsons  
Regional Coordinator

Cc. Murray Ball, Manager of Water Resources – Aboriginal Affairs and Northern Development Canada, Nunavut Regional Office



## **Technical Review Memorandum**

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

From: Ian Parsons – Regional Coordinator, AANDC.

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**Re: 2BE-GEO1015 – Request for Open Burning – George Lake – Sabina Gold and Silver Corporation (Sabina).**

### **Background**

The George Lake project is located in the Kitikmeot Region of Nunavut 100km South of Bathurst Inlet. The George Lake Project is part of the much larger Back River Project which includes several other properties. Existing facilities at George Lake consists of a gravel airstrip, 5 small structures for (office, sleeping quarters and kitchen) and a building for maintenance and storage. The drilling activities at George Lake will be based out of Goose Lake, with 2 shifts being rotated every 12 hours. Travel to the site would be via helicopter.

### **Recommendations/Comments**

First, AANDC would like to state that the open burning of wood waste as a form of disposal is not encouraged. AANDC has concerns that if the open burning is ineffective then there is a real threat to the environment involving Dioxins, Furan's, Nitrogen Oxides (NOx's) and Polycyclic Aromatic Hydrocarbons (PAH's).

AANDC would also like to state and recommend that if wood products and supplies can be brought to a remote location, then the proponent (licensee) should be able to remove those same products and supplies the same way they got the products and supplies to the remote location.

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.

Further to this, AANDC, when reviewing Sabina's request for open burning at George Lake, notes that Sabina includes their progressive reclamation plans for 2012, these plans include the backhauling of crushed drums, building waste, etc.



In this case, AANDC asks why Sabina will backhaul the crushed drums and building waste but prefers to burn and not back haul other materials such as non treated waste wood as well?

In the event that this cannot be accomplished, AANDC is not opposed to a limited and effective open burn with 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.

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