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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYIT
OFFICE DES EAUX DU NUNAVUT

**File No.: 2BE-GEO1015/TR/D3&D4
2BE-GOO1015/TR/D3&D4**

April 8, 2013

John Laitin, Manager
Sabina Gold & Silver Corp.
930 West 1st Street, Suite 202
North Vancouver, BC V7P 3N4
E-mail: jlaitin@sabinagoldsilver.com

**RE: Licenses No. 2BE-GEO1015 and 2BE-GOO1015, Type “B”, Sabina Gold and Silver Corp.;
Request to Carry out Open Burning of Acceptable Materials.**

Dear Mr. Laitin:

The Nunavut Water Board (“NWB”) received on February 27, 2013 a request from Sabina Gold & Silver Corp. (SGS) to complete controlled open burning, without the use of an incinerator, of approximately 100 m³ at George and approximately 100 m³ at Goose Camps, of acceptable materials (untreated wood materials such as paper, cardboard and wood). On February 28, 2013, the NWB acknowledged receipt and distributed the request to interested persons and parties for a thirty (30) day review period. Comments were received from Aboriginal Affairs and Northern Development Canada (AANDC) and Environment Canada (EC) on March 28, 2013, and from Kitikmeot Inuit Association (KIA) on March 27, 2013.

Upon review of the request, supporting documentation, terms and conditions in Licenses No. 2BE-GEO1015 and 2BE-GOO1015, and submissions from interested persons and/or parties, the NWB is satisfied that the activity, as proposed by the Licensee, would not directly or indirectly impact surface and groundwater, which is a requirement under Section 12.1(a), (b) of *the Nunavut Waters and Nunavut Surface Rights Tribunal Act*, and maintain its obligations to adhere to the terms and conditions in licenses. The NWB has, therefore, approved the request under motion No. 2013-B1-01 and 2013-B1-02, dated April 5, 2013, for an open burning of untreated and unpainted wood materials (approximately 100 m³ at each of 2 camps) to be carried out in summer 2013.

The NWB notes that there is a recommendation among others from the AANDC to *sample water bodies before and after burning that are within but not beyond 500 meters of the open burning area and that are downwind of the prevailing winds. Parameters to be tested would include, but are not limited to the following Dioxins, Furan’s, Nitrogen Oxides (NOx’s) and*

Polycyclic Aromatic hydrocarbons (PAH's). The Licensee is advised that soil sampling may also be required at the inspector's discretion. The results of this sampling should be included within the 2013 Annual Report.

The Licensee is advised of its obligations to comply with all of the terms and conditions in its licence as well as all applicable regulations and established guidelines^{1, 2, 3, 4.} which apply to open burning in Nunavut. In addition, the NWB has included as Appendix A, a summary of additional practices for carrying out the activity.

Should you have any questions, please feel free to contact the undersigned at 867-360-6338 ext. 30 or by email at k.kharatyan@nunavutwaterboard.org, at your earliest convenience.

Yours truly,

Original signed by:

Karén Kharatyan
Technical Advisor

Cc: Distribution List – Kitikmeot

1 Guidelines for the Planning, Design, Operations and Maintenance of Modified Solid Waste Sites in the NWT, Ferguson Simek Clark Engineers & Architects, FSC

2 http://www.ccme.ca/assets/pdf/d_and_f_standard_e.pdf

3 <http://www.ec.gc.ca/gdd-mw/default.asp?lang=En&n=F53EDE13-1>

4 <http://www.gov.nu.ca/env/Open%20burning.pdf>

APPENDIX A – PRACTICES FOR OPEN BURNING

The NWB highlights several key items of this approval for carrying out of the activities, which include:

- a. The Licensee follow the Government of Nunavut’s policy on the open burning of segregated wastes, and shall not allow the open burning of plastics, wood treated with preservatives, electrical wire, Styrofoam, asbestos or painted wood;
- b. Solid wastes that are conditionally suitable for open burning are paper products, paperboard packaging and untreated wood wastes only;
- c. Wood and other acceptable products will be kept as dry as possible before and during burning;
- d. The size of the burn pile will be minimized, and a “**hot burn**” maintained to create an efficient burn using consistent/constant feed rates to avoid over-feeding and damping the fire;
- e. Burning will only be undertaken during favorable weather conditions (i.e. will not be undertaken during periods of extreme wind or during wet rain conditions);
- f. Fires will be completely extinguished to ensure that any smoldering of material does not persist;
- g. The Burn pits are to be located on appropriate surfaces (bedrock, gravel or sand) and in areas such that impacts to surface water and groundwater drainage do not occur;
- h. The Burn pits are constructed, operated and maintained so that any materials to be disposed of are contained during the process, including ashes;
- i. Any residual waste and ashes be collected and disposed of in an appropriate, approved facility; and
- j. Surface water runoff from the Burn pit areas shall be managed to prevent any direct or indirect flow into a water body and that no additional impacts to water are created.