



Phyllis Beaulieu, Manager of Licensing
Nunavut Water Board
PO Box 119
Gjoa Haven, NU X0B 1J0

January 20, 2011

Re: 2BE-GEO1015 Request for open burning under Part D

Dear Ms. Beaulieu,

The above noted license issued to Sabina does not allow the open burning of waste without the approval of the NWB. Part D, sections 3 and 4 state:

3. The Licensee is authorized to dispose of all acceptable food waste, paper waste and untreated wood products in an incinerator.

4. The Licensee shall not open burn plastics, wood treated with preservatives, electric wire, Styrofoam, asbestos or painted wood to prevent the deposition of waste materials of incomplete combustion and/or leachate from contaminated ash residual, from impacting any surrounding waters, unless otherwise approved by the Board in writing.

This letter is to request Board approval for the controlled burning of untreated wood waste at the Back River Project George camp. Although Sabina actively incorporates reduction, reuse and recycling of wood products in its day-to-day operations, there remains residual wood waste that needs to be disposed of. It is Sabina's preference to manage this waste during the annual exploration program rather than stockpiling for disposal during subsequent exploration seasons. The current plan is to conduct resupply and exploration activities from March to May 2011. We would also prefer to dispose of clean, untreated wood waste through controlled burning as opposed to disposal to an on-site landfill.

Sabina would also implement progressive reclamation activities at George camp as outlined in 2BEGEO105, part J and the approved A&R Plan. The tentative plan for the next two years is outlined below; this will be dependant on corporate strategic vision and regulatory requirements. A photo of George camp is attached for your reference.



2011

- Crush and pallet ~1000 empty drums
- ~200 drums of fuel (most are known type, some of unknown type) on site to be used during 2011-2012 exploration programs, or moved to containment berm inside bulk tank containment to be removed off site during 2012 backhaul.
- Gut ATCO trailers and package waste for disposal offsite; ATCO trailers to remain on-site until decision made to either flatten and dispose or renovate and use for exploration activities.
- Gut wooden structures and burn
- Recondition existing weatherhaven camp to be used on-site for clean-up crew and/or exploration crew.

2012

- During 2012 resupply and backhaul remove pallets of crushed drums, waste fuel, and any building waste.
- If ATCO trailers to be disposed, they will be flattened and removed during backhaul for disposal

This request includes controlled open burning of approximately 60m³ (equivalent to approximately 2 standard seacans 20'x8'x8') of untreated wood products such as paper, cardboard and wood. This material is principally from reclamation and restoration activities related to removal of the original camp buildings, and would be too large for transport to Goose or Hackett camps for disposal.

Sabina proposes to establish of a burn pit toward the southern area of the George camp. These areas are in excess of 30m away from George Lake and other waterways and downwind of camp facilities. Controlled burning of clean wood waste will be undertaken on a periodic and as required basis in accordance with established Government of Nunavut guidelines¹. Periodic burning will be undertaken as follows:

- Only non-treated wood waste will be burned on-site in the designated areas. Wood sources would include paper products, paperboard packaging, and untreated wood such as damaged pallets, construction lumber, building demolition waste, and core boxes. We anticipate that most of the material (>75%) will be construction lumber.
- The material will be kept as dry as possible before burning, or kept covered to the greatest extent possible before burning
- 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
- Burning will be undertaken during favourable weather conditions, primarily consisting of periods where wind direction is blowing away from George Lake. Burning will be restricted during periods of high winds, or during particularly hot, dry conditions.



- Fires will be completely extinguished to ensure that any smoldering material does not persist. Fire fighting equipment and staff will be available and the fire will not be left unattended.

We trust that this letter provides the information required to consider our request. We have discussed this waste management option at George camp with the landowner, the Kitikmeot Inuit Association. They have previously indicated their approval for removal of the old camp buildings by incineration/in-situ burning.

If you have any questions regarding this request please call me at (604) 998-4175.

Yours truly,



John Laitin
Manager Technical and Logistical Services

cc. Ian Rumbolt, INAC Water Resources
Stanley Anablak, KIA Lands and Environment

1. <http://env.gov.nu.ca/sites/default/files/Municipal%20Solid%20Waste%20Suitable%20for%20Open%20Burning.pdf>



George Camp – September 2010

Drum fuel storage

Bulk fuel storage



ATCO trailers

Wooden structures