Environment Canada
Canada
Environmental Assessment North
Environmental Protection Operations
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Iqaluit, NU X0A 0H0
Tel: (867) 975-4631

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March 28, 2013

EC file: 4703 001 106 NWB file: 2BE-GEO1015

Via email: licensing@nunavutwaterboard.org

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

Attention: Ms. Beaulieu

RE: 130228: 2BE-GEO1015 Open Burning Request

Environment Canada (EC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above-mentioned open burning request. The following specialist advice has been provided pursuant to the *Canadian Environmental Protection Act 1999*, the pollution prevention provisions of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

Sabina Gold & Silver Corp. is requesting approval from the NWB for the controlled burning of approximately 60 m³ of untreated wood products at the Back River Project George camp. Periodic burning of wood waste (including wood products such as paper, cardboard and wood) is proposed to be burned on-site in designated areas as opposed to disposal at an on-site landfill.

Based on a review of the request, EC has no comments beyond those provided last year to the NWB regarding the same request for this activity in 2011 and 2012 (letter dated April 12, 2012, as attached). Comments previously submitted on behalf of EC regarding water license 2BE-GEO would still apply. If there are any proposed changes to the project or the open burning request EC should be notified as further review may be necessary. Please do not hesitate to contact the undersigned with any questions or comments with regards to the foregoing at (867) 975-4631 or Paula.C.Smith@ec.gc.ca.

Regards,

Paula C. Smith

Environmental Assessment Coordinator

cc: Carey Ogilvie, Head, EA-North, EA and Marine Programs, EC



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Environmental Assessment North Environmental Protection Operations (EPO) Qimugjuk Building 969 PO Box 1870 Iqaluit, NU X0A 0H0

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12 April 2012

EC file: 4703 001 114

4703 001 106

NWB file: 2BE-GOO1015 2BE-GEO1015

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

Via email: licensing@nunavutwaterboard.org

RE: 120312 2BE-GOO1015 and 2BE-GEO1015 Request for Open Burning

Environment Canada (EC) has reviewed the information submitted with the above-mentioned request as submitted to the Nunavut Water Board (NWB). The following specialist advice has been provided pursuant to the *Canadian Environmental Protection Act* 1999, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

Sabina Gold & Silver Corp. is requesting approval from the NWB for the controlled burning of approximately 60 m³ of untreated wood products at the Back River Project George camp and approximately 100 m³ at the Goose camp in 2012. Wood waste (including wood products such as paper, cardboard and wood) to be burned is primarily from reclamation and restoration activities related to removal of the original camp buildings.

Based on a review of the proposed request, EC has no comments beyond those provided last year to the NWB regarding the same request for these projects in 2011 (letter dated 24 February 2011, as attached). Comments previously submitted on behalf of EC regarding water licenses 2BE-GOO and 2BE-GEO would still apply to these projects. If there are any additional proposed changes to the projects or the open burning request EC should be notified, as further review may be necessary. Please do not hesitate to contact the undersigned with any questions or comments with regards to the foregoing at (867) 975-4631 or by email at Paula.C.Smith@ec.gc.ca.

Yours truly,

Paula C. Smith

Environmental Assessment Coordinator

cc: Carey Ogilvie (Head, Environmental Assessment-North, EPO, Yellowknife, NT)
Allison Dunn (Sr. Environmental Assessment Coordinator, EPO, Iqaluit, NU)

Dave Fox (Air Issues Specialist, EPO, Yellowknife, NT)

Ron Bujold (Environmental Assessment Officer, EPO, Yellowknife, NT)

Environmental Protection Operations Qimugjuk Building 969 P.O. Box 1870 Iqaluit, NU X0A 0H0

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24 February 2011 EC File: 4703 001 114

4703 001 106

NWB File: 2BE-GEO1015

2BE-GOO1015

Richard Dwyer Licensing Administrator Nunavut Water Board P.O. Box 119 Gjoa Haven, NU X0B 1J0

Via email: licensingadmin@nunavutwaterboard.org

RE: 2BE-GEO1015 and 2BE-GOO1015 Open Burning Request

Environment Canada (EC) has reviewed the above-mentioned request submitted to the Nunavut Water Board (NWB). The following specialist advice has been provided pursuant to the *Canadian Environmental Protection Act*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

Sabina Gold & Silver Corp. is applying to the NWB to allow for controlled open burning of untreated wood waste at both their George and Goose camps. The request includes untreated wood products such as paper, cardboard, and wood. The material is principally from reclamation and restoration activities related to the removal of the original camp buildings.

In principal, EC does not encourage the open burning of wood waste as a means of disposal. However, considering the incinerator capacity constraints at the Hackett camp, EC recommends the proponent heed the following guidance:

- Solid wastes that are conditionally suitable for open burning are paper products, paperboard packaging and untreated wood. Plywood, painted wood or other treated wood should not be disposed of in this manner.
 - For reference, below is a link to the Nunavut Municipal Open Burning Policy:
 - http://www.gov.nu.ca/env/Open%20burning.pdf
 - and below is a link to information from EC regarding open burning:
 - http://www.ec.gc.ca/gdd-mw/684B44DD-5780-4F73-BC58-
 - A97E31A19EDC/COM1170 Open Burning Brochure e v6 for%20web.pdf
- EC recommends that all non-combustible associated structure waste (i.e., plastics, tar paper, floor coverings, shingles, insulation, wiring, and tents) be thoroughly removed prior to burning
- EC recommends that all residual waste from the burning (i.e. nails and coals) be thoroughly collected, removed from site, and disposed of at a suitable facility.

If there are any changes in the project EC should be notified as further review may be necessary. Comments previously submitted by EC regarding water licenses 2BE-GEO and 2BE-GOO would



still apply to these projects. Please do not hesitate to contact the undersigned with any questions or comments with regards to the foregoing at (867) 975-4631 or by email at Paula.C.Smith@ec.gc.ca

Yours truly,

Paula C. Smith

Environmental Assessment Coordinator

cc: Carey Ogilvie (Head, Environmental Assessment-North, EPO, EC, Yellowknife, NT)

Ron Bujold (Environmental Assessment Technician, EPO, EC, Yellowknife, NT)

 $Allison\ Dunn\ (Sr.\ Environmental\ Assessment\ Coordinator,\ EPO,\ EC,\ Iqaluit,\ NU)$

Dave Fox (Air Issues Specialist, EPO, EC, Yellowknife, NT)