### **Richard Dwyer**

From: Elizabeth Sherlock [ESherlock@sabinagoldsilver.com]

Sent: Monday, December 06, 2010 3:54 PM

To: 'NWB Karén Kharatyan'

Cc: info@nirb.ca; 'NPC Brian Aglukark'; John Laitin; Richard Dwyer

**Subject:** 2BEGOO1015 amendment request deficiencies

Mr. Laitin has asked that I respond to your letter of December 1, 2010 outlining the deficiencies of the water license amendment request. Sabina has been working toward addressing these deficiencies in a timely manner and we provide the following;

- A. The requested increase for domestic water use at Goose camp is from 15 m<sup>3</sup>/day to 30 m<sup>3</sup>/day. Our apologies for the typographical error.
- B. The request to amend the water license to include terms regarding open burning is because the current terms (Part D) only include the use of incinerator or what cannot be included in an open burn. Specifically:

#### PART D: CONDITIONS APPLYING TO WASTE DISPOSAL

- 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.

There is no reference to what we can include in an open burn situation with the NWB approval. We are seeking the inclusion of controlled, without the use of incinerator, burning in our options for waste management as there are times over the season when the volume of waste wood products are of a volume, or size, that exceed the design/operation guidelines of our current incinerator. We are requesting an amendment to the water license to include a term (possibly as part of Part D, item 4);

The Licensee shall follow the practices for open burning of selected materials as outlined in the "Waste Management Plan".

A revised Waste Management Plan has been submitted as part of the application package.

Your letter suggests that the NWB will not include this consideration with this amendment request. In this case, a separate request will be submitted for your consideration. We would ask for further details on the needs and the associated approval process if a separate request is required.

- C. The NIRB has been provided a copy of the amendment request package and we will continue to work with them to obtain the screening decision (or confirmation not needed) in a timely manner.
- D. The NPC has been provided a copy of the amendment request package and we will continue to work with them to obtain the conformity decision (or confirmation not needed) in a timely manner.

We look forward to the direction that will come with the development of guidelines for open burning and if we can be of assistance in their development, please contact me. As these deficiencies are addressed, we will submit them to your attention.

Regards,

# Elizabeth

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Environmental/Permitting Coordinator

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