

Environmental Protection Operations
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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
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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)
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