



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

February 5, 2013

**Re: 2BE-GOO1015 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 Goose 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 waste during the annual exploration program rather than stockpiling for disposal during subsequent exploration seasons. We would also prefer to dispose of clean, untreated wood waste through controlled burning as opposed to disposal to an on-site landfill.

This request includes controlled open burning of approximately 100m<sup>3</sup> (equivalent to approximately 3 standard seacans 20'x8'x8') of untreated wood products such as paper, cardboard and wood. This material is either too large for the existing incinerator at Goose camp or is of a significant volume that it exceeds the operating capacity of the existing incinerator.

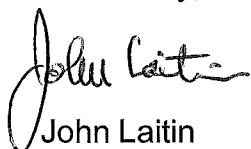


Sabina proposes to establish two (2) burn pits with one adjacent to the current incinerator location toward the southern area of the Goose camp and the second further away the camp toward the exploration trench area. The main area used for open burning would be near the incinerator. These areas are in excess of 30m away from Goose 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 guidelines<sup>1</sup>. Periodic burning will be undertaken as follows:

- Only non-treated wood waste will be burned on-site in the designated areas. No treated wood, plywood or petroleum-based materials, including materials contaminated with petroleum-based products, will be burned in the fire or used as accelerants. Wood sources would include paper products, paperboard packaging, and untreated wood such as damaged pallets, construction lumber, building demolition waste, and core boxes.
- 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 Goose 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. Firefighting 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. 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. Eva Paul, AANDC Water Resources  
Wynter Kuliktana, KIA Lands and Environment

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

