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Department of Environment

Ministère de l'Environnement

Jan. 26, 07

Richard Dwyer
Licensing Trainee
Nunavut Water Board

via Email to: licensingtrainee@nunavutwaterboard.org

RE: NWB FILE # 2BE-HAK – SABINA SILVER CORP. – HACKETT RIVER PROJECT

Dear Mr. Dwyer:

The Government of Nunavut, Department of Environment (DOE) has reviewed the Hackett River project from Sabina Silver Corp. for conducting precious metal and base metal exploration 104 km south of Bathurst Inlet, and has the following comments and recommendations to make.

1. SPILL CONTINGENCY PLAN:

Based on the Government of Nunavut *Spill Contingency Planning and Reporting Regulations*, and DOE's guideline - *Contingency Planning and Spill Reporting in Nunavut: a Guide to the New Regulations*, DOE has the following recommendations to make:

- All fuel storage containers should be situated in a manner that allows easy access and removal of containers in the event of leaks or spills. Large fuel caches in excess of 20 drums should be inspected daily.
- To prevent spreading in the event of a spill, fuel stored in drums should be located, whenever practical, in a natural depression a minimum distance of 90 feet from all streams, preferably in an area of low permeability.

2. ABANDONMENT & RESTORATION

Based on the DOE's *Guideline for Contaminated Site Remediation*, DOE recommends final inspections of the entire site should be conducted by the proponent and lead agency to make sure that all areas of the site have been reclaimed as much as possible to its previous condition. Soil samples and pictures before and after the project would make this process easy on the proponent and leading agencies involved in determining areas of concern.

3. INCINERATION

The Government of Nunavut is signatory to the Canada-Wide Standard (CWS) for dioxins and furans, and the CWS to mercury; therefore, we advise the proponent follows recommendations below to ensure compliance with CWS for incineration.

For camps of 10 to 50 people, the proponent shall apply appropriate technologies to ensure complete combustion of wastes, and the use of a dual chamber, forced-air incinerator is recommended. The proponent shall make determined efforts to achieve compliance with CWSs for dioxins and furans and CWS for mercury. Efforts should include the implementation of a comprehensive waste management strategy (especially waste segregation) that is designed to reduce and control the volumes of wastes produced, transported, and disposed of. The Waste Management Strategy should consider and include:

- Purchasing policies that focus on reduced packaging,
- On-site diversion and segregation programs (i.e. the separation of non-food waste items suitable for storage and subsequent transport and disposal or recycling).
- If incineration is required, ensure diligent operation and maintenance of the incineration device and provide appropriate training to the personnel operating and maintaining the incinerator.

Waste wood treated with preservatives such as creosote, pentachlorophenol or heavy metal solutions should not be burned. Additionally, plastics, electrical wire, asbestos and building demolition wastes (except clean wood) are wastes likely to produce dioxins and furans when burned and should be excluded from incineration. Under no circumstance should hazardous wastes be managed through burning or incineration.

4. WILDLIFE

Barren-ground caribou, generally part of the Bathurst herd, may migrate southwestward through the project area in late summer to their winter range. In the late winter, the caribou migrate northeastward to calving grounds near Bathurst Inlet. When migration of caribou is observed, DOE recommends the following recommendations be implemented:

- The proponent shall not locate and operate so as to block or cause substantial diversion to migrating caribou. The proponent shall cease activities that may interfere with migration, such as airborne geophysics surveys or movement of equipment, until the migrating caribou have passed.
- Aircrafts should maintain a minimum altitude of 610 meters above ground level in places where there are occurrences of caribou.

The DOE thank NWB for giving us the opportunity to review and provide comments on the Hackett River project. Please contact us if you have any further questions or comments.

Yours sincerely,

Original signed by

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