

From: Don Carr  
Sent: Thursday, December 10, 2009 11:20 AM  
To: Ida Porter  
Subject: FW: Wishbone property water use  
Attachments: Hackett\_incinerator\_summer2009.JPG;  
Hackett\_Incinerator\_specifications.pdf

-----Original Message-----

From: Elizabeth Sherlock [mailto:ESherlock@sabinagoldsilver.com]  
Sent: Thursday, December 10, 2009 7:39 AM  
To: dcarr@nunavutwaterboard.org  
Subject: RE: Wishbone property water use

Good Morning Don,

In response to your email of Dec 7, 2009 Sabina has reviewed the submissions from the public review of the 2BEHAK0209 application for amendment and renewal. Your email requests a specific response to comments related to waste incineration methods selected and water quality issues. Comments submitted that refer to incineration include GN-DoE and Environment Canada.

The GN-DoE has indicated that waste wood treated with preservatives, plastics, electrical wire, asbestos and building demolition wastes (except clean wood) should not be burned in order to meet Canada Wide Standards (CWS) for dioxins, furans and mercury. The current incinerator was installed in 2008 (see attached photo) in response to issues related to air emission standards and is a 2-stage incinerator with a secondary chamber sized for a 2 second retention at 1000C. It is capable of meeting the CWS if operated properly. Sabina is committed to the proper operation of this facility and has implemented on site training for the unit and annual maintenance completed by the manufacturer.

Waste management at Hackett camp includes segregation of material such as hazardous wastes, waste oil and noncombustible waste generated through the course of the operation and is backhauled out of camp and disposed of in an approved waste disposal site. This includes treated wood and electrical wire to date. Plastics on site occur in a variety of forms and segregation of waste includes recycling as much as possible with backhaul to Yellowknife to the appropriate facilities. When this isn't possible, such as kitchen plastics and packaging, they are incinerated and the residual ash is backhauled for disposal in an appropriate facility.

The Environment Canada comments include a request for design specifications and manufacturer details. The unit is a C-50 supplied by the Canadian company Eco-Waste Solutions based in Burlington Ontario. This is proven technology under Arctic conditions with similar models used at the Eureka Military Base and Voisey Bay Nickel Mine. Although not the same model, this manufacturer has supplied incinerators to Snap Lake, Polaris, and Alert Military Base. The choice of this technology is because of its application in remote locations and ability to incinerate sewage, clean wood waste, plastics, cardboard, packaging material. We are pleased to attach sections of the quote from Eco-Waste that provides incinerator specifications. Environment Canada's submission requests a current letter from the manufacturer and once available I will forward.

We recognize that an increase in camp size and exploration activity will increase the volume of waste generated, however, the incinerator selected has the capacity to handle the increase. We also recognize that the increase in camp size and exploration activities may result in additional permitting, monitoring and reporting needs. Sabina is currently reviewing these needs and will include the National Pollutant Release Inventory to determine if the size of camp, hours worked and emissions exceed identified reporting thresholds. We will revise monitoring and reporting needs in consultation with regulatory bodies to ensure legal requirements are met with consideration of site remoteness and logistical considerations.

With respect to incineration management, Sabina is actively reviewing its internal policies and procedures in light of all comments submitted and permits/licences that we will be conducting exploration activities under. We are adjusting internal processes as needed to ensure compliance with all authorizations during the upcoming exploration season.

Sabina is committed to exploring in the Kitikmeot Region in a manner that is socially acceptable and environmentally responsible. Waste management starts with the 3Rs (reduce, reuse and recycle) that are implemented as much as feasible given the exploration camp location and access logistics, however, there will always be waste material that will need to be managed. The current options are landfilling/sumps or incineration with both producing emissions and having possible environmental impacts. The solid ash waste that is the result of incineration does need to be landfilled, however, the volume to be managed is much smaller than if the waste had not been incinerated. Sabina has chosen incineration because it is an economical and proven solution that meets terms of our current water license and land use permits and minimizes environmental impacts.

If there is any further questions about the incinerator, or the water licence application, please contact me.  
Elizabeth

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From: dcarr@nunavutwaterboard.org [dcarr@nunavutwaterboard.org]  
Sent: December 7, 2009 8:43 AM  
To: Elizabeth Sherlock  
Subject: Re: Wishbone property water use

Hello Elizabeth,

Thanks for the quick response last week. The deliniation you have provided for the Wishbone trend is sufficient. However, I do have a couple additional information requests for you on the 2BE-HAK0709 Renewal prior to taking it to the Board.

In the Reclamation Estimate (Sept 2009) provided with the renewal, numerous references to NWB unit costs are provided and the estimate does not identify which model was used (eg RECLAIM). Could you clarify what NWB unit costs are as I have not encountered the term and identify which model was used?

Also, during the public review period several parties commented on the current method of sewage disposal. The NWB requests the Applicant provide a response to the Board that addresses comments made by the parties and states the

anticipated impact to water of the requested method of sewage disposal.

Thanks,

Don

- > Good afternoon Don,
- > In response to your letter sent today with respect to deficiencies in
- > the Goose Lake application and our subsequent phone conversation, I
- > have attached a map outlining the general division of support for
- > exploration activities at the Wishbone Property between the Hackett
- > River and Goose Lake camps. The line presented is at latitude 65deg28'00".
- > If further details and clarification is needed for the Hackett River
- > and Goose Lake applications please contact me.
- > Elizabeth
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- > Sabina Gold & Silver Corp.
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