



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

February 1, 2011

**Re: 2BE-HAK0915 Request for open burning under Part D**

Dear Ms. Beaulieu,

Thermal waste management methods are included in the above noted water license under Part D, section 3 stating:

*3. The Licensee is authorized to dispose of all acceptable food waste, paper waste and untreated wood products in an incinerator.*

The above noted license issued to Sabina does not provide any direction to the open burning of waste, however, the NWB has indicated (letter dated December 1, 2010; file 2BE-GOO1015) that amending a water license to include open burning is not accepted at this time pending direction from concurrent consultation on open burning of wastes. In the interim, we have been advised that the Board may approve open burning on a case-by-case basis.

This letter is to request Board approval for the controlled burning of untreated wood waste at the Hackett River Project Hackett 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. Sabina has also undertaken camp improvements over the past two years that has resulted in some building wood wastes that require disposal. It is Sabina's preference to manage waste during the annual exploration program rather than stockpiling for disposal during subsequent exploration seasons. We actively backhaul waste material for disposal in an approved facility (waste generator #NTG000018), however, some material is difficult to backhaul for safety and logistical reasons. We would 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 Hackett camp or is of a significant volume that it exceeds the operating capacity of the existing incinerator.



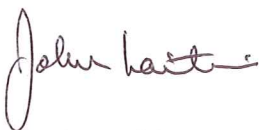
Sabina proposes to establish two (2) burn pits with one adjacent to the current incinerator location toward the southwestern area of the camp and the second further away the camp. These areas are in excess of 30m away from Camp Lake and other waterways and downwind of camp facilities. Controlled burning 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. 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 Camp 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. Fire fighting 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. Ian Rumbolt, INAC Water Resources Officer  
Stanley Anablak, KIA Lands and Environment

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