



April 29th, 2013

Ms. Phyllis Beaulieu,
Manager of Licensing
Nunavut Water Board
PO Box 119
Gjoa Haven, NU
XOB IJO

Re: 2BE-H4K0915 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:

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 originally to Sabina and transferred to Xstrata Zinc in 2011, does not provide any direction to the open burning of waste. Xstrata understand that the Board can approve open burning but on a case-by-case basis. Last year, Xstrata received a letter (dated May 1, 2012) confirming NWB was satisfied that open burning would not directly or indirectly impact surface or groundwater (motion No.2012-00-L03) under Licence 2BE-HAK0915.

This present letter is to request similar Board approval for the controlled burning of untreated wood waste at the Hackett River Project Hackett camp for 2013. Although Xstrata 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. Also camp improvements will take place this year which will result in some building wood wastes that require disposal. It is Xstrata'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 #NUG0050), however, some material is difficult to backhaul for safety and logistical reasons. Xstrata 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 100m³ (equivalent to approximately 3 standard sea cans 20'x8'x8') of untreated wood products and occasionally, cardboard. 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.

In 2012, Xstrata incorporated an aggressive recycling program whereby cardboard is recycled whenever possible, and in 2013, we are implementing a paper recycling program, in an effort to reduce the volume of material that ends up at the incinerator. In addition, plywood and other wood waste which may contain glues are not burned, nor is painted wood. Only clean wood waste that is unable to be used elsewhere in camp is burned.



Xstrata proposes to establish a single burn pit approximately 15m from the current incinerator location toward the southwestern area of the camp. This area is in excess of 30m away from Camp Lake and other waterways and downwind of camp facilities, and in the existing burn pit location from past years. Controlled burning of clean wood waste will be undertaken on a periodic and as required basis in accordance with established Government of Nunavut guidelines. 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 (unpainted) 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 favorable 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. 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 contact me at your convenience.

Yours truly,

A handwritten signature in dark ink, appearing to read 'Robert Prairie', is written over a light blue horizontal line.

Robert Prairie
Xstrata Zinc Canada
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cc: S. Burgess / R. Davidson
S. Hamm
D. Hamel

