

# **POLARIS MINE**

# POST-RECLAMATION MONITORING REPORT 2011 4<sup>th</sup> QUARTER and 2011 ANNUAL REPORT FOR THE NUNAVUT WATER BOARD

&

ABORIGINAL AFFAIRS AND NORTHERN DEVELOPMENT CANADA

March 17, 2013

# **DISTRIBUTION LIST**

Nunavut Water Board - 2 copies
 Manager of Licensing
 Nunavut Water Board

P.O. Box 119

Gjoa Haven, NU X0B 1J0

2. Department of Aboriginal Affairs and Northern Development – 1 copy Manager, Land Administration

Department of Indian Affairs and Northern Development 969 Qimugjuk Building, 2<sup>nd</sup> Floor

Box 100

Iqaluit, NU X0A 0H0

3. Teck - 2 copies

Reclamation Manager,

Teck Resource Limited.

Bag 2000

Kimberley, BC V1A 3E1

www.teck.com

# Teck

March 17, 2013

Nunavut Water Board Box 119 Gjoa Haven, NU X0B 0J0

Attention: Phyllis Beaulieu, Manager of Licensing

Aboriginal Affairs and Northern Development Canada 969 Qimugjuk Building, 2<sup>nd</sup> Floor Iqaluit, Nunavut X0A 0H0

Attention: Jeff Mercer, Manager, Lands Administration

Dear Ms. Beaulieu and Mr. Mercer:

# Re: <u>Polaris Mine Water Licence NWB1POL0311 – 2011 4th Quarter and Annual Water Licence</u> and <u>Decommissioning and Reclamation Plan Reports</u>

Please find attached the Polaris Mine 2011 4th Quarter and 2011 Annual Reports required under Polaris's Water Licence and Decommissioning and Reclamation Plan (DRP). I have attached paper copies of this report to this letter in addition to an electronic copy (pdf format on CD). I have not included a translation into Inuktitut as the translator is currently travelling. I will forward the translation electronically as soon as we receive it.

There were no activities or sampling done at the Polaris Mine site during the 4<sup>th</sup> Quarter of 2011 as the site was snow covered and there were no effluent discharges due to the freezing temperatures. Apart from the sampling of Garrow Lake in the 2<sup>nd</sup> Quarter of 2011, all monitoring was conducted during the 3<sup>rd</sup> Quarter of 2011 which was previously reported. As of September 2011, it has now been nine years since the mine ceased production and closed and seven years since reclamation was completed. The Polaris Mine has been a Recognized Closed Mine under the Metal Mining Effluent Regulations (MMER) since 2006 and has no further obligations under MMER.

If you have any questions regarding this report, please do not hesitate to contact me.

Yours truly,

Bruce Donald
Reclamation Manager
Environment
Teck Resources Limited



# **TABLE OF CONTENTS**

		PAGE
1.	NTRODUCTION	1
2.	011 4 <sup>th</sup> QUARTER REPORT	1
	.1. Reclamation Activities	1
	.2. Site Monitoring	. 1
	.3. Financial Reporting	. 1
	2.3.1. Updated Financial Report	. 1
	2.3.2. Request for Adjustment	1
3.	011 ANNUAL REPORT	1
	.1. Unauthorized Discharges	. 1
	.2. Progress Report of Studies and Plans	1
	3. Executive Summary of Report Translated into Inuktitut	. 2
	4.4. Summary of Closure and/or Reclamation Work Undertaken	2
	5.5. Estimate of the Total Mine Closure Cost	. 2
	.6. Public Consultation / Participation	2
	.7. Work Conducted in Response to Inspection or Compliance Reports	2
	.8. Effluent and Water Quality Studies Conducted	. 3
	3.8.1. Quantities of Fresh Water Pumped From Frustration Lake	. 3
	3.8.2. Garrow Lake Water Column Monitoring	. 3
	3.8.3. Garrow Lake Effluent Monitoring	. 3
	.9. Details of Water Use or Waste Disposal Requested By the Board	3

# **LIST OF APPENDICES**

APPENDIX 1	Executive Summary Translated into Inuktitut
APPENDIX 2	Technical Memorandum from Azimuth Consulting Group
APPENDIX 3	Electronic Copy of Files on CD



#### 1. INTRODUCTION

The Polaris Mine ceased operation in September of 2002. Immediately upon mine closure, reclamation activities commenced in accordance with the Decommissioning and Reclamation Plan (DRP) approved by the Nunavut Water Board and Indian and Northern Affairs Canada. The DRP as well as the Water Licence requires reporting of work and monitoring activities on both a quarterly and an annual basis. This document includes both the 2011 4<sup>th</sup> Quarter and the 2011 Annual Report for the Polaris Mine site.

An executive summary of this report translated into Inuktitut is included as Appendix 1.

# 2. 2011 4<sup>th</sup> QUARTER REPORT

#### 2.1. Reclamation Activities

During the entire 4th Quarter of 2011, the Polaris Mine remained unoccupied by personnel. All reclamation activities are now fully completed.

#### 2.2. Site Monitoring

During the entire 4<sup>th</sup> Quarter of 2011, the Polaris Mine remained unoccupied by personnel and no monitoring events occurred as all surface waters were frozen. As a result there is no effluent water quality data to report.

#### 2.3. Financial Reporting

## 2.3.1. Updated Financial Report

No further costs have been expended as all activities for the year are now complete.

# 2.3.2. Request for Adjustment`

As stated in the 3<sup>rd</sup> Quarter report, Teck is not requesting an adjustment of its reclamation security (currently there is \$3.539M posted) as this topic will be reviewed as part of any re-licensing activities going forward.

#### 3. 2011 ANNUAL REPORT

Part B, Section 6 of the Water Licence requires that an Annual Report be filed that includes the following topics.

# 3.1. Unauthorized Discharges

The Polaris Mine had no unauthorized discharges to report.

## 3.2. Progress Report of Studies and Plans

- The primary issue that has not been resolved is a geotechnical report discussing potential future subsidence of the ground surface over the underground mine workings. This remains outstanding.
- The Spill Contingency Plan is now null and void as there are no further activities or conditions on site that require a spill contingency plan.

\_\_\_\_\_

#### 3.3. Executive Summary of Report Translated into Inuktitut

Included in Appendix 1 is an executive summary of both the 2011 4<sup>th</sup> Quarter Report and the 2011 Annual Report translated into Inuktitut.

## 3.4. Summary of Closure and/or Reclamation Work Undertaken

- A summary of any closure and reclamation work undertaken during the year and an outline of work anticipated for the next year is outlined below:
- During the 3rd Quarter of 2011, the key annual monitoring requirements for the Polaris Mine were undertaken.
- From July 16th to 21st, 6 people were on site to conduct a geotechnical inspection, topographical monitoring by surveying, retrieving thermistor data from landfills, and collecting other miscellaneous samples. A contractor also had two people on site making final preparations for removal of all remaining equipment and supplies from the site.
- A site inspection was conducted by 4 AANDC representatives on July 17th. The group consisted of Ian Parsons, (AANDC, Water Resources); Kevin Robertson (Lands Inspector, AANDC), Holger Hartmaier, consulting Geotechnical Engineer from BGC Engineering; and Christine Berube (summer student, Water Resources). The AANDC representatives spent all day on site and inspected all areas of significant reclamation activities. They also collected water samples from Garrow Creek, Garrow Lake, Frustration Lake and LRD Quarry Landfill.
- On September 1st, the final removal of Teck's temporary exploration style camp, site materials, equipment, and supplies was done by sea lift. A wood shed was left for a local Inuit at his request. Two quads, a boat and miscellaneous equipment remained on site until September 2nd for the Garrow Lake sampling event. After the Garrow Lake sampling was completed, this equipment was also removed.
- .No further reclamation work is planned and not has been requested by regulators who have inspected the site.

#### 3.5. Estimate of the Total Mine Closure Cost

An update of reclamation and monitoring costs was presented in the 3<sup>rd</sup> Quarter report and no further costs were incurred in the 4<sup>th</sup> Quarter of 2011. Total costs for 2011 were \$474,000. No further work under the Closure Plan nor the Water Licence are required. The Land Leases have now expired and the Water Licence expired at year end.

## 3.6. Public consultation / Participation

- No public consultations were conducted as the site is basically dormant other than for monitoring.
- One Inuit resident from Resolute assisted with the annual inspection and maintenance program at the site. In addition to providing local employment, the local knowledge for the safety of workers on site is important. Having a local resident involved with monitoring of the site has the benefit of ensuring that the nearest community is aware of site activity and site conditions.

# 3.7. Work Conducted in Response to Inspection or Compliance Reports

None required.

#### 3.8. Effluent and Water Quality Studies Conducted

## 3.8.1. Quantities of Fresh Water Pumped From Frustration Lake

The water licence requires the monthly and annual quantities (in cubic metres) of water pumped from Frustration Lake to be reported.

 No water was pumped as the site's freshwater system was demolished and reclaimed in 2004.

#### 3.8.2. Garrow Lake Water Column Monitoring

During 2011, the Water Licence required three monitoring events (at mid-winter, at maximum ice thickness, and at maximum ice melt) in two separate locations of the Garrow Lake water column stratigraphy. The mid-winter monitoring event was not conducted as charter aircraft will not fly to this isolated, abandoned site in the dark. The maximum ice thickness and maximum melt monitoring event did not occur due to problems with shipping sampling equipment to the site as discussed in the 2<sup>nd</sup> Quarter report. The 3<sup>rd</sup> Quarter sampling event was reported in the 3<sup>rd</sup> Quarter report.

The 3<sup>rd</sup> Quarter reports include an analysis of the limnology of Garrow Lake in Appendix B in the form of Total Zinc concentration graphs from 2005 to 2011 for both the Centre sampling station (#262-3) and the South sampling station (#262-3A). Trends were fully consistent with previous sampling events continuing to confirm the expected on-going stability of both the physical and chemical properties of the lake.

## 3.8.3. Garrow Creek Effluent Monitoring

The Water Licence and the DRP requires sampling of the Final Discharge Point from Garrow Lake during periods of effluent discharge. All water quality results were compliant with the parameters specified in the Water Licence. In addition there was no acute toxicity in either the Rainbow Trout or the Daphnia magna. Subleathality sampling was also done and some subleathal effects were noted. An assessment of this is provided in Appendix 2. The details of the monitoring results can be found in the previously submitted 3<sup>rd</sup> Quarter report. The 3<sup>rd</sup> Quarter report also reports the sample results from the reference area and Garrow Bay sample results.

# 3.9. Details of Water Use or Waste Disposal Requested By the Board

- There is no fresh water use at the site. No details of water use have been requested by the board.
- There was no waste disposal at the site. All debris generated in 2011 was removed from site along with the sealift of other materials leaving site.

# **APPENDIX 1**

**Executive Summary** 

**Translated into Inuktitut** 

## 

▷ፌ ▷፵ቴጐ ፌΔፌፕሬደተ ▷፵ቴ፵▷ዛ ለሢፈቦታሢ በ፟፟፟፟፟፟፟፟፟፟፟፟፟፟፟፟፟፟፟፟፟፟፟ዾዾስጋሩ ▷፵ቴጐ Δ፮ባጋር ነበር▷ሬደት.

## 2. PZ\_1%\_%C

ρο ρσ $\dot{b}$   $\dot{p}$   $\dot{q}$   $\dot{q}$ 

ቴቃΔጋራሌራ∿ቃ ኦበበዲታራቴ ቴላፖረኦፕንቴ L?፦የΓ 2011ህበጋJ የፖላራ ፖበለሊ 1Γጋላቴ, የህር-ናቴ ሰቴሪ ለህበኄና (Δቴህ ውርኦሬኦ)ና ፖራፕርኦበንላኄና, ለህበኄና ላፖሴጋ ኦΓላቴላላሪ ኦፖኦኦጋበቴ. የՎጋራ ፖርΔժህ የሆኑርኦሬኦንቴ ውፈርΓኦውና Δውኄውና (Δժህ የሆኑርኦህአኦኦሪኦ)ቴ በኣደርቱ, ኦΓላቴ ላፖንጋኦኄጋ ለህሰና ፖር L?፦የΓሬኦንና ፖበሊሊ 2ህናፖራቴህራ የላን ርፖህራ ቴኦኦኣንበቴኦጋበቴ. የላን ርፖህ ቴኦኦኣርኦኦሊር, (Δժላ Δኄናላበንላልና (Δቴህ ውርኦሬኦፒፋ.

#### 3. ALP · APGUC PAYPPGU

#### 3.1. ГФР ₫Ч

ΔLጎΙ' Λ $\mathsf{A}$ Φρι Λ $\mathsf{A}$ ΛΦθη $\mathsf{A}$ Τά Λ $\mathsf{A}$ ΛΑΤά (Li' δρρς (ρδίδρωσ Γαλ  $\mathsf{A}$ Τά  $\mathsf{A}$ Γων  $\mathsf{A}$ Ες Λρστις ΔLρ' Λρστις Δργος Λρστις δρρς Λρστις δρρς Λρστις Γρηγημάνου δρρς Λρστις Λ $\mathsf{A}$ Φρις Λρστις Λοντις Λρστις Λοντις Λρστις Λοντις Λρστις Λοντις Λρστις Λροτις Γρηγημάνου δρρς Γρηγος δρργοσιας:

	ተልየኑ <sub>የ</sub> ተም-ም-ንገ <sub>ር</sub>			
	<b>ላ</b> ੰዮራ'\*	<b></b> ፟፟፟፟፟፟፟፟፟፟፟፟፟፟፟፟፟፟፟፟፟፟፟፟፟፟፟፟፟፟፟፟፟፟፟፟	ძ∿ՐԺ <sup></sup> ∿ს¹	
∇Γ,⅂ ∨ዻኇ⊳⋃⊳‹ ∇ԿʹϹ৻℀ℳ				
ርሦርĽነገና ላዅ፫፞፟	0.07	0.50	15.00	
Δ/-(′ል∿ ላ∿፫ۥህ≺៤)	0.14	1.00	30.00	
<i>₽⊳৮८,</i> ₵⊳ᢋ。⊳ᡵ¬。ᡀ。:				
<b>ძ</b> ∟∆/2/2011	0.0030	0.011	1.0	
<b>≺</b> ∟∆/12/2011	0.0002	0.025	1.0	
<b>⊣</b> ∟∆/18/2011	0.0002	0.057	1.0	
<b>≺</b> ∟∆/23/2011	0.0001	0.062	3.0	
ଏ୮√/16/2011	0.0002	0.041	1.0	
⊲\ <sub>1</sub> √/26/2011	0.0002	0.041	1.0	
<b>ረ</b> ∩∧ <sub>∿</sub> /2/2011	0.0002	0.041	1.0	
<b>ረ</b> ∩∧∿ <i>≻\</i> 09/11	0.0003	0.051	1.0	

᠘ᢣ᠘᠘᠘᠘᠘᠘᠘᠘᠘᠘᠘᠘᠘᠘᠘᠘᠘᠘᠘᠘᠘᠘᠘ ۲ ،ᢣᡐ᠒ᡣᢣ᠘᠘᠘᠘᠘᠘᠘

## 3.2. ቦላ? ርረ<sup>ሚ</sup>ር ርሌ ነር ሲ

 $\Delta \Delta \dot{a}$  ),  $\Delta \Delta \dot{b}$   $\Delta \dot{b}$   $\Delta \dot{b}$   $\Delta \dot{b}$   $\Delta \dot{b}$ 

 $\mathcal{C}^{*}$ 

- CAL LASHL(Boll Freezer)  $11\dot{\Gamma}$ (CF Prest) (0.153 Pi)J(AU/SUC) LASHL(Boll), ALD

ΛLΛΡ>\* ΡΡΛΡΡΡΛΦΗ ΦΥσ'<\\\\
ΛΚΡΡ\\(C) (CΔLΔ)\\\
10Γ΄CΓ\ ΔΠσ\\σ), 0.5

## 

#### 3.3.1. 4<りゅ やしっし トラトゥィレゼ</p>

4P<5)\* የFd $_{2}$ F  $_{3}$ F  $_{4}$ F  $_{4}$ F  $_{5}$ FP<br/>  $_{4}$ FC<br/>  $_{4}$ FC<br/

#### 3.3.2. Hbb%l + Cr%

# 4. ዔዾΔጋ፫ርህዋብ ላርሚዣዋብ L?ሮ۴Γ

#### 4.1. ፴፭ ህር ላ▷፫ ምህረት (▷ምህ

#### 

 $4\%ICL^{'}$ , የህ୮ሀኽርነጋ፣ ለሢታΔ፫ቴሢላኇ ፖፆታፕረተላኇ ርፚፅኇ ፖልሢ፫ፕበርኦቴኖዥLLC ቴኔልጋኇልኇሢኔ ኦበነበርኦ፞፞፞ፚታ፟ነበጋ፤ ላምርኦኇፅ. የህ୮ሀኒጋር ቴኦትፌታቴርነጋ፣ በታተLLኂር ፖፆታፕረተላያ ላየታረኦፖኒታን L፫ኔና የህ୮ሀኒጋር ርዛኢኦዛኇ ቴኦትኒቴርነጋ፣ ፖታሢኇ ርፅዛኢኦዛቴኒኒና ፖፆታፕረተላኇ ላፖትፕርኦσፅኖና ፖሪኔና ላL」 L፫ኒኔና, ርፅ፟፟፟፟፟፟ኦላቸ በታዛቴሩ፫ላኒን፣. በበናኦንፕረዛኇ የህ୮ሀፕርኦዛኇ ፖፆታፕላታላ ርኖራ Δ፫ላርር Δ፫ርላሪ ን፫ጋኇ፥.

## 4.3. ላናJCL<sup>c</sup> ውፎሢር ላዋርኦፖLታሢር 锡ኦትኣፕኦታሢ

- (14) (14), 6\frac{1}{2} \delta \text{L-4}
- DD<
- 4),(D 4, 4,(,V,
- ◄<</li>
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
   □
- >>%
   >
   >
   >
   >
   >
   >
   >
   >
   >
   >
   >
   >
   >
   >
   >

   <li
- ✓৬৮٬४८४ ४७% ९५% ००%

 $bbblalb^{c}$   $j^{c}$   $bblalb^{c}$   $bblalb^{c}$   $bblalb^{c}$ 

- "۵ህ৮元 ጋላ የተመሰር ነት ፈነገስ ነት ልግብር ነት ላጋ የነን ተልግብር ነት ልግብር ነት

 $_{2}$   $_{2}$   $_{2}$   $_{3}$   $_{4}$   $_{4}$   $_{5}$   $_{4}$   $_{5}$   $_{5}$   $_{6}$   $_{6}$   $_{6}$   $_{6}$   $_{7}$   $_{7}$   $_{7}$   $_{7}$   $_{8}$   $_{7}$   $_{8}$ 

- "Λϧʹͼ·ϞʹϹ ΔϲʹϞ ʹϧϹϻ϶ϽϲϭϲϲͰϲʹ ϽϤ<ϲϲͰʹϒͰͺϤʹ (ΔͰΔϽϞʹ ΛϥϹͿ϶Ϳ ϲͼ Ϥϧ·ʹϹϷʹͼ·ϤʹϧϹʹͼ·ʹϧϹͿʹͰͺͼʹ ʹϧϹϻͰͺʹϹϷʹ ΔͰʹϞ ʹϧϹϻͰͺͰͼʹϲϲ Ϸ϶ϲϧϷϲϷϽʹ ϲͿϧʹϒͿʹ ϤϲΔ 2011Γ ʹϧϷϧͺʹϹϷϹͿͿ.

#### 

#### 

- "ኦትፌንላጋσ (ժ\ኦላσ፥ ላ/ት'σርቴሬኦፕን፥ ኦታዩተኦፕልልσኦና ተልሢσሢσ (ժኦኦላσ ላሬΔ 2011ህበጋJ ዾፌሢ ቴኦትኒናኦበጋJ Δ/LΓጋJ ተ\$σላσ LንታኦሬኦበፊJ ቴኦትኒናኦLና. ኦትሬጋንሮ፥ (ժ\ኦላσ ለርቴሬኦፕን፥ ተልሢσሢσ ላሬΔ 2011Γ ቴኦትኒናኦበጋJ ላርጎሬንርኦላሬንጋቴ፥ Δዾጐራ ኦኖጋቴና ኦLላጎዾና."
- "4ናJ ( $\dot{L}^c$  6በ $\dot{L}^c$  60 $\dot{L}^c$  60 $\dot{L}^c$ 0 $\dot{L}^$

#### \_o\_U5 - d)(D + d)(M)

#### 

#### $_{\Delta}$ ይ $_{\Delta}$ $_{\Delta}$

- "78% ተንታላታ ለጎርኒል 4000 ነጋሩ 5000 ተንታር 1000 ተንታሪ 1000

#### 

 $\dot{a}$ LJF Dall BPY(POWC DFW DCDW CPF CPF DCPW 8F.

#### 

	(८८० ८५० ८	
ا√د ۲	(⊳ <sub>۲</sub> ), Ļ(¬ <sub>(</sub> )	<b>⊳</b> ℅⊳୵ <sup>ℴ</sup> ℆Δ <sup>ℴ</sup>
27-≺Ժ-05	1005.30	
24-⊲レ८-05	1005.26	᠔᠋᠆ᡏ᠘᠘᠘ᡒ᠘
29-ՎԺ-06	1005.69	
09-≺∟∆-06	1005.62	∳ጋኈ ጋ<<የ ለ>⊃(⊂ላብ\Γ≺ዓ。
20-⊲レ८-06	1005.50	ላC ፞ቑጋቇ ፞ቑጋ <b>ላ</b> ¬⊀ዺኯ፞፞
31-⊀∟∆-07	1005.60	∳ጋኈ ጋ<ሩየ ለ>⊃(⊂ላብ\Γ⊀ዓ。
19-⊀∟∆-08	1005.97	%%(%)(\$\L\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\
29-⊲レ′-08		%₽₽₭?ቊኄСጐ。 ୮,뜨¬ዺӷ。
24-≺∟∆-09	1006.09	$% \frac{1}{2} \left( \frac{1}{2$
14-⊀∟∆-10	1006.04	ぱんにつてマストイパト 40いしょ (しがつ40)
19-⊀∟∆-11	1006.10	ぱんにつてマストイパト すりいしょ (しゃつん)し

#### 

#### 5.1. ΥΥ¬<ΔΓ ΔΦΥ¬, βΡΥΡΑ, 20 ΔΓ

ΔLP<  $\Lambda$ <apn%  $\Lambda$ <apn%  $\Lambda$ <br/>  $\Lambda$ <b

٩٢٥٥، ١٤ع٥ن ٨٦٥٨ لموكة المحملات دلم كمالت مالاتأن

•  $\prime$  ታይላ ተመልጋታ የር ኦታቴ የታ ( $\dot{\Delta}$  አመን ላም ( $\dot{\Delta}$  አመን ተሞ ላይ የመልጋታ የመልጋታ የመልጋታ የመልጋታ የመልጋታ የመልጋታ የመደረገ የተመደረገ የተመደረገ የመደረገ የመደ

• ቴናረተዮፕርჀ ርረÞና ΔህሬናርÞሁታናና ቴናረተჀႫჀነንፕቴ ርረፕ, ርΔL ርLናፔቴ ቴረረፈጋ ላርႫንነጋ ላበቴንፕԵ৮ናንቴ ኣልናታቴኒቴታሊ, ቴኌΔጋጋΔሬቴ ΔLቴ ቴንቴ ርናረፐና ቴኒግና ረድ ኦኒርኌናታዮንቴ ΔLÞ ΛՎΔΡΟር ΛՎΔΏ(СՆԺና Lerascof).

#### 

በኣ∟ልና ኦፌነፍነፖኦስና ላየፖርኦሬኦንና (Lልኌና ላኦሩንን የፐժጋ୮ ኣኦኦኦፖLዲና ላየርነጋժ ላևኃ ላንናኦዲት ላየርልՐ ኣኦኦኦፖLዲታ. ኦፌነፍነፖኦና ላጋታ (Lነፕ Δ፫/ልኦፖLዲና ኦፌነታፖኦበታት ላትነገታ ልበ፫፫ነታ ኦ፫ኒታታ (Lታ ጋላሩንՐ ላևጋ ልበታኒኒዮ ላየርልኒቴልኦዲነዮ ኦላፖኦኦኒዓጋን ኦፌነምኒር ቴኌልጋታኒ. ቴኦርሲና ኦፌነታፖኦስና ኦ፫ፖሊቲኖጋና ላևጋ (Lልታ ልዲታኒዮታ ኣኦኦኦፖLዲና በበናርኦኖ፫ላዴና ል፫ታ በበናና፫ላጋቦት (Lልታ፫ኒዮ ኦፌነታፖኦበኒቴ)ታ. (ልև ላኦኦርሲና, ርፅላ በበናና፫ዴና ርժፌኒ በበናንበኒዮታና ኌላርኦኒርንና ላጋልፌንበፖጋቦት ቴኦርሲና ኦፌነታኒር በበናና፫ላፖLኦኒዮታና (Lልታ ኦፌታኒኦስታና.

#### 

#### 

# 7. acbĊʻCbYLゼ ላГላሪዅ የabba b\Ċaphi

ጋ∿ልቦጋЈ ለኦሊላኽታ∿ Lapt ΔLJ ለላapn, ( $\Delta$ /- $\sigma$ 4)\* በ/ለሊ 31, 2011Γ), በነሪ  $\Delta$ /LJ CL۴Γ-L\* ለኦሊላቴርፕ L- $\sigma$ 6 ΔLJ ለላapn bላ/በርኦ $\sigma$ 6. በነሪ  $\Delta$ /Lላ የaph b  $\Delta$ /L የ  $\Delta$ /- $\Delta$ 0 ከሪ $\sigma$ 6 እርቅንበታ ለርቴፕ)\* L?- $\sigma$ 7 ለ $\sigma$ 7 L- $\sigma$ 8 እርቅንበታ ለርቴፕ)\* L?- $\sigma$ 8 እርቅንበታ ለርቴፕ)\*

# **APPENDIX 2**

# **Letter Report Titled**

"Implications of Subleathal Toxicity Testing Results at the

**Polaris Mine"** 

**Azimuth Consulting Group** 

**April 3, 2013** 



Azimuth Consulting Group Partnership 218-2902 West Broadway Vancouver, BC Canada V6K 2G8

Phone: 604-730-1220 Fax: 604-739-8511 www.azimuthgroup.ca

Our File #: TC-03-01

April 3, 2013

Mr. Bruce Donald Teck Metals PO Box 2000 Kimberley BC V1A 3C1

Dear Mr. Donald:

RE: Implications of Sublethal Toxicity Testing Results at Polaris Mine

At the request of Teck Metals (Teck), Azimuth has prepared this brief summary of results of sublethal toxicity test results at the Polaris Mine, Little Cornwallis Island and implications of failures of sublethal toxicity testing on future monitoring and/or requirements, based on Environment Canada guidance within the Metal Mining Effluent (MMER) regulations. The impetus for this technical letter is to review the most recent results of sublethal toxicity testing and discuss implications, if any, on future long-term monitoring requirements at the Polaris Mine.

**Tables 1** and **2** provide a summary of acute and sublethal toxicity data respectively between 2003 and 2011. Results of these tests have been discussed within other submissions, however, the consequences of toxicity in acute and sublethal tests has not.

No acute lethality to rainbow trout (*Oncorhynchus mykiss*) and the waterflea (*Daphia magna*) have been recorded in two or three times annual toxicity testing since 2003, save a single event in 2007 when testing was conducted by a different laboratory. Given the lack of acute toxicity, there is no requirement within the MMER to conduct any further testing (e.g., a toxicity identification evaluation) nor follow up assessment of effluent quality.

There has been consistent sublethal toxicity since 2003 for two of three species tested. Because the effluent from Garrow Lake is slightly brackish, effluent has been salinity adjusted to allow testing of marine organisms. A brief summary of most recent 2010 and 2011 results (Table 2) is as follows:

- No effect to topsmelt (*Atherinops affinis*) survival or growth rate at full strength effluent
- In the 2011 Echinoderm (*Dendraster ecentricus*) fertilization test, only the full strength effluent concentration produced a significantly lower fertilization ratio relative to the

• Page 2 April 3, 2013

control group. The IC25 was 41% and the IC50 was >53%. Similar results were observed in 2010, with slightly lower IC25 and IC50 values (67% and >100%).

• In the 2011 algal reproduction test (*Champia parvula*), there was 43% impairment to cystocarp production at the IC25 level. In 2010, there was 68% impairment to cystocarp production, but only at the highest effluent concentration (66%). The IC25 was estimated at 41% effluent.

With respect to the implications of sublethal toxicity of effluent, Environment Canada MMER guidelines specifically address this in a recent March 1, 2012 update to the MMER. The link to the test specifically relating to sublethal toxicity of effluent can be found at <a href="http://canadagazette.gc.ca/rp-pr/p2/2012/2012-03-14/html/sor-dors22-eng.html">http://canadagazette.gc.ca/rp-pr/p2/2012/2012-03-14/html/sor-dors22-eng.html</a>. A summary of the specific text within this update is as follows:

4. The Amendments remove the requirement in Schedule 5, paragraph 17(g) and referred to in paragraphs 21(1)(a) and 25(a) to compare the results of sublethal toxicity testing with results of biological monitoring studies to determine if there is a correlation. These comparisons did not lead to meaningful results on a consistent basis.

In place of the previous requirement in paragraph 17(g), the Amendments introduce a new requirement to include, as part of each interpretive report for biological monitoring studies, a summary of the results of effluent characterization, water quality monitoring and sublethal toxicity testing. (see footnote 4) Prior to the Amendments, many mines voluntarily included such a summary in each interpretive report, but this requirement will ensure that this summary is provided in all cases, aiding in the interpretation of the results of biological monitoring studies.

This text clearly states that there is no specific requirement to conduct follow up testing in the receiving environment, nor have such studies attempting to do so found any correlation. Notwithstanding this, Azimuth did undertake a receiving environment effects assessment in 2003 on nearshore water quality, plume delineation and dispersion and metals concentrations in benthic clams offshore of Garrow Creek. No effects and no potential effects was found because of rapid dilution and dispersion of the slightly brackish plume within the upper few cm of the water column as it entered the marine environment of Garrow Bay.

In summary, there are no follow up procedures or studies that are required in the event that sublethal toxicity is found in effluent. The trigger for follow up investigations lies in consecutive failures in acute toxicity tests, which have never been observed at Polaris Mine. Thus, there is no requirement to pursue any incidences of sublethal toxicity as part of a long-term monitoring program of discharge from Garrow Lake

Please let me know if you required any further information.

Sincerely,

**Azimuth Consulting Group Partnership** 

Randy Baker, MSc, RPBio.

Table 1. Summary of Polaris Mine acute toxicity tests, 2003 - 2011.

Test Date	Species Tested	Test Type	Sample Method	Consultant Laboratory	LC50 (% effluent)	LC50 Lower Confidence Limit (% effluent)	LC50 Upper Confidence Limi (% effluent)
Rainbow Trout 96-hr L	.C50						
29-Jul-03	Oncorhynchus mykiss	Survival	Grab	EVS Consultants, North Vancouver, BC	> 100	-	-
19-Aug-03	Oncorhynchus mykiss	Survival	Grab	EVS Consultants, North Vancouver, BC	> 100	-	-
16-Sep-03	Oncorhynchus mykiss	Survival	Grab	EVS Consultants, North Vancouver, BC	> 100	-	_
7-Jul-04	Oncorhynchus mykiss	Survival	Grab	EVS Consultants, North Vancouver, BC	> 100	-	_
27-Jul-04	Oncorhynchus mykiss	Survival	Grab	EVS Consultants, North Vancouver, BC	> 100	_	_
24-Aug-04	Oncorhynchus mykiss	Survival	Grab	EVS Consultants North Vancouver, BC	> 100	-	_
16-Jul-05	Oncorhynchus mykiss	Survival	Grab	EVS Consultants North Vancouver, BC	> 100	-	_
6-Aug-05	Oncorhynchus mykiss	Survival	Grab	EVS Consultants North Vancouver, BC	> 100	_	_
15-Jul-06	Oncorhynchus mykiss	Survival	Grab	Golder Associates, North Vancouver, BC	> 100	_	_
23-Aug-06	Oncorhynchus mykiss	Survival	Grab	Golder Associates, North Vancouver, BC	> 100	_	
9-Sep-06	Sample lost due to laborat		Giab	Colder 7 (3300)dices, North Valledaver, 20	> 100		
26-Jul-07	Oncorhynchus mykiss	Survival	Grab	ALS Environmental, Winnipeg, MB	PASS	_	_
23-Aug-07	Oncorhynchus mykiss	Survival	Grab	ALS Environmental, Winnipeg, MB	> 100	_	_
6-Sep-07	Oncorhynchus mykiss	Survival	Grab	ALS Environmental, Winnipeg, MB	> 100	_	_
30-Aug-08	Oncorhynchus mykiss	Survival	Grab	Nautilus Environmental, Burnaby, BC	> 100		_
9-Sep-08	Oncorhynchus mykiss	Survival	Grab	Nautilus Environmental, Burnaby, BC	> 100		
18-Jul-09	Oncorhynchus mykiss	Survival	Grab	Nautilus Environmental, Burnaby, BC	> 100		_
16-Jul-10	Oncorhynchus mykiss	Survival	Grab	Nautilus Environmental, Burnaby, BC	> 100	-	-
23-Aug-10	Oncorhynchus mykiss	Survival	Grab	Nautilus Environmental, Burnaby, BC	> 100	-	-
23-Aug-10 23-Jul-11	Oncorhynchus mykiss	Survival	Grab	Nautilus Environmental, Burnaby, BC	> 100	-	-
7-Sep-11	Oncorhynchus mykiss	Survival	Grab	Nautilus Environmental, Burnaby, BC	> 100	-	-
Daphnia magna 48-hr	LC50						
29-Jul-03	Daphnia magna	Survival	Grab	EVS Consultants, North Vancouver, BC	> 100	-	-
19-Aug-03	Daphnia magna	Survival	Grab	EVS Consultants North Vancouver, BC	> 100	-	-
16-Sep-03	Daphnia magna	Survival	Grab	EVS Consultants North Vancouver, BC	> 100	-	-
7-Jul-04	Daphnia magna	Survival	Grab	EVS Consultants, North Vancouver, BC	> 100	-	-
27-Jul-04	Daphnia magna	Survival	Grab	EVS Consultants North Vancouver, BC	> 100	-	-
24-Aug-04	Daphnia magna	Survival	Grab	EVS Consultants North Vancouver, BC	> 100	-	_
16-Jul-05	Daphnia magna	Survival	Grab	EVS Consultants North Vancouver, BC	> 100	-	_
6-Aug-05	Daphnia magna	Survival	Grab	EVS Consultants North Vancouver, BC	> 100	-	-
15-Jul-06	Daphnia magna	Survival	Grab	Golder Associates, North Vancouver, BC	> 100	-	-
23-Aug-06	Daphnia magna	Survival	Grab	Golder Associates, North Vancouver, BC	> 100	-	-
9-Sep-06	Daphnia magna	Survival	Grab	Golder Associates, North Vancouver, BC	> 100	-	-
26-Jul-07	Daphnia magna	Survival	Grab	ALS Environmental, Winnipeg, MB	PASS	-	-
23-Aug-07	Daphnia magna	Survival	Grab	ALS Environmental, Winnipeg, MB	67.4	59.7	76.1
6-Sep-07	Daphnia magna	Survival	Grab	ALS Environmental, Winnipeg, MB	86.6	-	-
30-Aug-08	Daphnia magna	Survival	Grab	Nautilus Environmental, Burnaby, BC	> 100	-	-
9-Sep-08	Daphnia magna	Survival	Grab	Nautilus Environmental, Burnaby, BC	> 100	-	-
18-Jul-09	Daphnia magna	Survival	Grab	Nautilus Environmental, Burnaby, BC	> 100	-	-
16-Jul-10	Daphnia magna	Survival	Grab	Nautilus Environmental, Burnaby, BC	> 100	-	-
23-Aug-10	Daphnia magna	Survival	Grab	Nautilus Environmental, Burnaby, BC	> 100	-	-
23-Jul-11	Daphnia magna	Survival	Grab	Nautilus Environmental, Burnaby, BC	> 100	-	-
7-Sep-11	Daphnia magna	Survival	Grab	Nautilus Environmental, Burnaby, BC	> 100		

Table 2. Summary of Polaris Mine sublethal toxicity tests 2003 - 2011.

Test Date	Species Tested	Test Type	Sample Method	Consultant Laboratory	EC25 or IC25 (% effluent)	EC25 or IC25 Lower Confidence Limit (% effluent)	EC25 or IC25 Upper Confidence Limit (% effluent)
Topsmelt (Atherinops aff	finis) 7-d Growth and S	Survival Toxicity	Test - Growtl	n Endpoint			
19-Aug-03	Atherinops affinis	Growth	Grab	EVS Consultants, North Vancouver, BC	> 72.3	-	-
7-Jul-04	Atherinops affinis	Growth	Grab	EVS Consultants, North Vancouver, BC	> 72.6	-	-
27-Jul-04	Atherinops affinis	Growth	Grab	EVS Consultants, North Vancouver, BC	> 69.0	-	-
24-Aug-04	Atherinops affinis	Growth	Grab	EVS Consultants North Vancouver, BC	> 71.0	-	-
16-Jul-05	Atherinops affinis	Growth	Grab	EVS Consultants North Vancouver, BC	> 71.4	-	-
6-Aug-05	Atherinops affinis	Growth	Grab	EVS Consultants North Vancouver, BC	> 67.4	-	-
16-Jul-10	Atherinops affinis	Growth	Grab	Nautilus Environmental, Burnaby, BC	> 100		
Topsmelt (Atherinops aff	finis) 7-d Growth and S	Survival Toxicity	Test - Surviv	al Endpoint	LC50 (% effluent)	) for survival endpoi	nt only
19-Aug-03	Atherinops affinis	Survival	Grab	EVS Consultants, North Vancouver, BC	> 72.3	-	-
7-Jul-04	Atherinops affinis	Survival	Grab	EVS Consultants, North Vancouver, BC	> 72.6	_	-
27-Jul-04	Atherinops affinis	Survival	Grab	EVS Consultants, North Vancouver, BC	> 69.0	-	-
24-Aug-04	Atherinops affinis	Survival	Grab	EVS Consultants, North Vancouver, BC	> 71.0	_	-
16-Jul-05	Atherinops affinis	Survival	Grab	EVS Consultants, North Vancouver, BC	> 71.4	-	-
6-Aug-05	Atherinops affinis	Survival	Grab	EVS Consultants, North Vancouver, BC	> 67.4	_	-
16-Jul-10	Atherinops affinis	Survival	Grab	Nautilus Environmental, Burnaby, BC	> 100		
Sandollar Echinoderm (L	Dendraster excentricus	) 92-h Echinoder	m Fertilizatio	on Test			
19-Aug-03 <i>L</i>	Dendraster excentricus	Reproduction	Grab	EVS Consultants North Vancouver, BC	3.8	1.1	7.2
27-Jul-04 <i>[</i>	Dendraster excentricus	Reproduction	Grab	EVS Consultants North Vancouver, BC	8.7	7.6	9.9
24-Aug-04 <i>[</i>	Dendraster excentricus	Reproduction	Grab	EVS Consultants North Vancouver, BC	17.5	11.6	22.6
16-Jul-05 <i>L</i>	Dendraster excentricus	Reproduction	Grab	EVS Consultants North Vancouver, BC	5.2	4.4	6.0
6-Aug-05 <i>L</i>	Dendraster excentricus	Reproduction	Grab	EVS Consultants North Vancouver, BC	15.6	13.6	18.3
16-Jul-10 <i>L</i>	Dendraster excentricus	Reproduction	Grab	Nautilus Environmental, Burnaby, BC	66.6	42.6	83.1
Red Algae (Champia par	vula) 7-d Sublethal Alg	al Toxicity Test					
				Saskatchewan Research Council (SRC),			
19-Aug-03	Champia parvula	Reproduction	Grab	Saskatoon, SK	13.6	9.0	16.0
27-Jul-04	Champia parvula	Reproduction	Grab	SRC, Saskatoon, SK	26.6	20.8	31.5
24-Aug-04	Champia parvula	Reproduction	Grab	SRC, Saskatoon, SK	45.3	36.3	58.1
16-Jul-05	Champia parvula	Reproduction	Grab	Stantec Inc, Guelph,ON	24.6	22.2	27.2
6-Aug-05	Champia parvula	Reproduction	Grab	SRC, Saskatoon, SK	45.3	27.5	52.4
Red Algae (Champia par	,						
23-Aug-10	Champia parvula	Reproduction	Grab	Nautilus Environmental, Burnaby, BC	41.1	37.3	43.9

# **APPENDIX 3**

**Electronic Copy of Report on CD**