



NWB Tools

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## 2022-KIT-JKM04-2AM-DOH.pdf

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Tue, Sep 6, 2022 at 11:48 AM

To: Guy Dufour <guy.dufour@agnicoeagle.com>, licensing <licensing@nwb-oen.ca>

Cc: "Fraser, Jeremy" <jeremy.fraser@rcaanc-cirnac.gc.ca>, Kelli Gillard <kgillard@nirb.ca>, Guillaume Dumont Vandewinkel <guillaume.dumont@agnicoeagle.com>, Nancy Duquet Harvey <nancy.harvey@agnicoeagle.com>, Ashley Mathai <ashley.mathai@agnicoeagle.com>

Hello, Thank you for the response I have the following questions;

1. Is the upper reagent pad lined and surrounded by berms like the other reagent pad?
2. In the inspection report response the licensee states the following; "Consumable chemicals received in seacans from the sealift are managed and stored as per Hope Bay's Spill Contingency Plan until they are ready for use, where they are moved to the camp pad." In the table below from the 2021 spill contingency plan states it identifies the below products to be stored in the TIA reagent pad (a lined facility), please ensure the products are stored in a lined and berm facility as approved by the NWB in the approved Spill management plan. Or provide written approval from the NWB to store the products outside the TIA reagent Pad and outside a lined bermed facility.

Storage Location	Facility Description/ Storage Capacity	Tank Description	Containment Capacity	Products Stored	Maximum Expected Quantity Stored
TIA Reagent Berm	Locked Seacan	NA	Seacans	Promoter	30, 100kg
	Locked Seacan	NA	Seacans	Frother	16,000 kg
	Locked Seacan	NA	Seacans	Flocculant Low pH	16, 000 kg
	Locked Seacan	NA	Seacans	Sodium Cyanide	240,000 kg
	Locked Seacan	NA	Seacan	Caustic Soda	450,000 kg
	Locked Seacan	NA	Seacans	Flocculant High pH	2,000 kg
	Locked Seacan	NA	Seacan	Sodium Metabisulphate	240,000 kg
	Locked Seacan	NA	Seacans	Copper Sulphate	125,000 kg
	Locked Seacan	NA	Seacans	Hydrochloric Acid	4000 kg
	Locked Seacan	NA	Seacans	Sodium Benzoate	20,000 kg
	Locked Seacan	NA	Seacans	Silica Sand	5000 kg
	Locked Seacan	NA	Seacans	Borax	12,500 kg
	Locked Seacan	NA	Seacans	Soda Ash	8750 kg
	Locked Seacan	NA	Seacans	Potassium Nitrate	5000 kg

3. In the response the licensee states that; "Runoff and seepage is captured in the system and is transported to the TIA." Please elaborate on how the licensee is ensuring this statement true, has the licensee conducted any tests or studies to ensure no seepage is passing the permeable wells? What is stopping the waste water that enters the well from leaving the well on the downstream side?

4. In the inspection report response the licensee states that; "The estimated amount being less than 100L" and "Since the oil is covered from the element by the building, the risk of it migrating is low. Any runoff from the area will be captured by the pollution control pond. We will plan the clean up if the building has to be moved or at the end of the mine during reclamation." While reviewing the spill contingency plan section 2.2.10 I am unable to see where it states that if a spill is beside a building or partially covered by a building it would be not remediated, it also states that heavy machinery may be used and is not a requirement. Due to the uncertainty of how long the spill was leaking for, the large quantity of oil inside the leaking containment and the need for repair I am requesting the licensee submit a spill report and the follow up report to ensure this spill and leaking containment is properly managed.
5. The inspector is requesting the licensee provide reasoning why it will take more than 6 months to install flow meters and is reminded that it is a requirement of the licence to install and maintain a flow meter.
6. In "Photo 2 : Totes at the powerhouse placed on a secondary containment", can you please provide the specifications for the secondary containment, secondary containment must contain 110%.

[Quoted text hidden]