

## WATER LICENCE INSPECTION FORM

Original	
Follow-Up	Report

**Action Required** 

Licensee Licensee Representative							
Agnico Eagle	Guy Dufo	ur					
Licence No. / Expiry			Representative's	Title			
2AM-DOH1335	•		Environm	ent (	General Superviso	r	
Land / Other Authorization	ns		Land / Other Aut	thorizati	ons		
Date of Inspection			Inspector				
November 16,	2022		Jonathan	MES	HER		
Activities Inspected  Camp	☐ Drilling		☐ Construc	tion	Reclamation	☐ Fuel Storage	
Roads/Hauling	Other:		Other:		reconnection		
Conditions: A -				cooctod			
	Acceptable	C - Concern	U - Unacceptab	Condit	NA – Not Applicable	NI – Not In	•
Water Use	Condition	Comment Site Condition		ion	Comme Haz/Mat Mana	igement Condition	Comment
Intake/Screen	NA	Water Manag	ement Structures	NA	Storage	U	
Flow Measure. Device	e A	Culverts / Brid	lges	NI	Spills	NI	
Source:	NA	Drainage		NA	Spill Plan	NI	
Water Use:	NA	Erosion / Sedi	ment	NI			
Recirculation ( y /n)	NA	Mitigation Me	easures	NI	Administrative		
		Reclamation A	Activities	NA	Records	A	
		Materials Stor	rage	NA	Reports	NI	
Waste Disposal		Signage		NI	Plans	NI	
Waste Water	NA				Notifications	A	
Solid Waste	А	Monitoring			Other		
Hazardous Waste	С	Sample Collec	tion / Analysis	Α	Follow-up from	ı NI	
					previous inspec	tion	

*The number in the comments field will correspond with specific comments provided below.			
Samples taken by Inspector:	Location(s):		
☐ Yes ⊠ No			

Non-Compliance with Act or Licence

Bad	ckgro	ound:

SECTION 1

On November 16, 2022, I Jonathan Mesher of CIRNAC conducted inspections of the facilities licenced under the Water licence 2AM-DOH1323, during the inspection I was accompanied by Guy Dufour(licensee representative)

## a. Waste Storage

**Comments** 

- I. During the inspection there was multiple seacans with fuel and Hazardous Materials outside of secondary containment. Section 4.1.1 of the hope bay spill contingency plan states; "This risk is minimized through the use of secondary containment and spill containment. All bulk fuel facilities are located in secondary containment (i.e., containment designed to contain volumes equivalent or greater than 110% of the aggregate or total volume of the largest container in the containment whichever is greater). Smaller chemical storage tanks are either double walled (have built-in secondary containment), and are located in spill trays such that any leakage from hoses or lines are further contained or are located in secondary containment berms. Spill trays are used under fuel drums and other smaller chemical containers." and section 4.6.1 of the Spill contingency of the spill contingency plan states; "All chemicals are kept in containment". See photos below for chemicals/ hazardous materials outside of containment.
- II. PART G, Item 21 of the licence 2AM-DOH states that; "The Licensee shall operate the Wastewater Treatment Plant, Landfill, Landfarm, Fuel Storage and Containment Facilities, Sedimentation Pond, Pollution Control Pond, and the Reagent and Cyanide Storage Facility sumps to the satisfaction of the Inspector." The current Reagent and Cyanide Storage Facility is not satisfactory, the decommissioned facility was lined and surrounded by berms. The area currently used is near a marshy area with no liner or berms to stop any potential spills from flowing into the surrounding environment.
- III. The inspector also noted glycol totes near the generator, the glycol was not in adequate secondary containment.





- PART I, item 3 of the licence 2AM-DOH states; "The Licensee shall provide secondary containment for fuel IV. and chemical storage as required by applicable standards and acceptable industry practice." And Section 4.3.7 of the Environmental Code of Practice for metal mines: chapter 4 states the following; R 326:
  - "The chemical storage and containment facilities used at each mine should be designed and constructed to meet the appropriate standards, regulations and guidelines of pertinent regulatory agencies and the owner/operator's environmental policy, objectives and targets. As a minimum, chemical storage and containment facilities should:
  - -be managed to minimize the potential for spills;
  - -provide containment in the event of spillage and be managed to minimize opportunities for spillage;
  - -comply with Workplace Hazardous Materials Information System (WHMIS) standards;
  - -ensure that incompatible materials are stored in ways to prevent accidental contact and chemical reactions with other materials; and
  - -minimize the probability that a spill could have a significant impact on the environment.

A wide range of chemicals are used at mining facilities. These can include fuels and lubricants, process reagents, and explosives, as well as a range of other chemicals, such as cleaning products, de-icing products and paints. Many of these chemicals could pose a risk to the environment or human health if they are released in sufficient concentrations. Further, some chemicals could react if they come in contact with or are exposed to other chemicals, and these reactions may pose a significant risk to human health and the environment. Therefore, the transportation, storage, usage and disposal of these products need to be carefully planned and implemented. "

Therefore due to the lack of containment in the event of spillage and the chemicals being store on the edge of the pad it does not appear the licensee is following acceptable industry practice.

On page 2 of the document "Re: Agnico Response to CIRNAC Inspection Report June 20, 2022" the licensee stated that; "The sulfuric acid drums in the open seacan racks were repackaged into lined seacans and relocated to the upper laydown area see photo 4, 5 and 6." During the inspection the inspector discovered unlined seacans full of Sulfuric Acid. On the same page the licensee also stated that; "2. Glycol totes at the powerhouse were relocated into lined seacan and the tote that remains at the powerhouse was placed on a secondary containment, see photo 2.", the glycol totes at the power house was not in secondary containment therefore the licensee has made two false statements in the response to the previous email. Section 88(obstruction), subsection (2) of the Nunavut Waters and Nunavut surface rights tribunal Act (NWNSRTA) states that; "No person shall knowingly make a false or misleading statement, either orally or in writing, to an inspector or other person engaged in carrying out functions under this Part." Continued obstruction or misleading statements will lead to the punishments described in Section 90, subsection (2) of the NWNSRTA.

### b. Water Usage

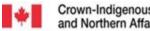
- During the inspection the licensee had installed flow meters at the windy lake pump house. ١.
- П. No other concerns were noted during this inspection.

Section 2 **Comments** Non-Compliance with Act or Licence Action Required

The licensee is to provide a plan 3 weeks after receiving the report to ensure the following concerns are addressed, this plan shall include a timeline for implementation.

1. The licensee is to provide a plan to ensure all required Hazardous Materials are stored within Secondary Containment as required by the licence and associated documents. Since the licensee has decommissioned the Reagent and Cyanide Storage Facility with Secondary containment it appears a significant amount of hazardous materials have been improperly stored.



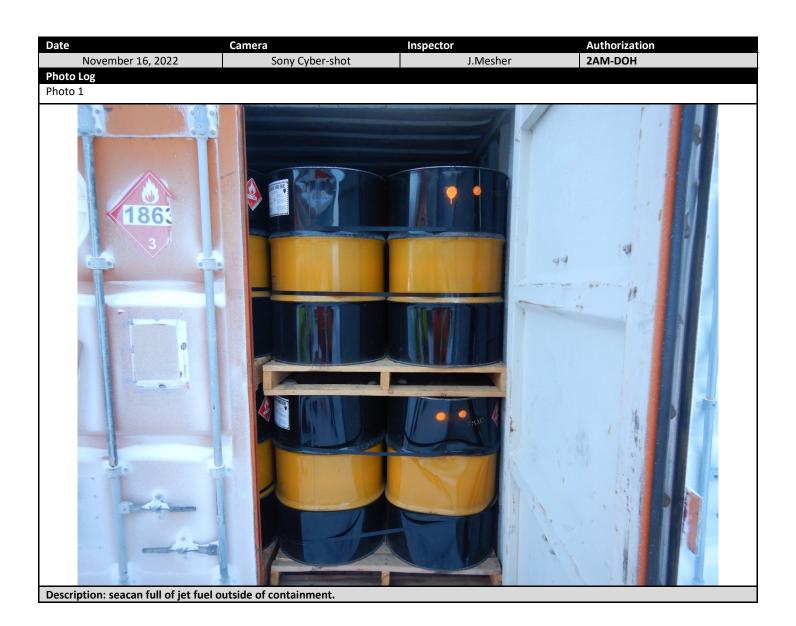


Inspector's Name	
Jonathan MESHER	
Signature	
Date	
1/9/2023	

Water Resource Officer, Nunavut Region Crown Indigenous Relations and Northern Affairs Canada – CIRNAC

Jonathan.mesher@canada.ca

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Description: Sodium Metabisulfite in secans not in secondary containment.



and Northern Affairs Canada et Affaires du Nord Canada Inspector Authorization November 16, 2022 Sony Cyber-shot J.Mesher 2AM-DOH **Photo Log** Photo 2 **Quadra** SODIUM METABISULFITE (WB) SODIUM METABISULFITE (WB)

Date Camera Inspector Authorization November 16, 2022 Sony Cyber-shot J.Mesher 2AM-DOH Photo Log







Date	Camera	Inspector	Authorization
November 16, 2022			
	Sony Cyber-shot	J.Mesher	2AM-doh

# Photo Log Photo 4



Description: hydrochloric acid 32% outside of secondary containment

Date	Camera	Inspector	Authorization
November 16, 2022			
	Sony Cyber-shot	J.Mesher	2AM-DOH

Photo 5



Description: Motor oil outside on secondary containment, on the edge of the storage pad.





Authorization Camera Inspector November 16, 2022 2AM-DOH Sony Cyber-shot J.Mesher

**Photo Log** Photo 6



Description: Helicopter Pad fuel broken secondary containment.

Date	Camera	Inspector	Authorization
November 16, 2022			
	Sony Cyber-shot	J.Mesher	2AM-DOH

## Photo Log

Photo 7



Description: sulfuric acid in unlined seacans.



