



March 3rd, 2022

Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O Box 119
Gjoa Haven, NU X0B 1J0

Re: 2AM-MEA1530 Agnico Eagle's response to CIRNAC's comments regarding Bulk Fuel Storage Facility: Environmental Performance Monitoring Plan, Version 6

Dear Mr. Dwyer,

The following information is intended to address the CIRNAC'S recommendations regarding the Bulk Fuel Storage Facility: Environmental Performance Monitoring Plan, Version 6:

- CIRNAC – February 17, 2022: Crown-Indigenous Relations and Northern Affairs Canada's review comments on Baker Lake Bulk Fuel Storage Facility: Environmental Performance Monitoring Plan, version 6, for Water Licence 2AM-MEA1530

Should you have any questions or require further information, please do not hesitate to contact us at the below.

Regards,

Agnico Eagle Mines Limited – Meadowbank Complex

Alexandre Lavallee
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Environment & Critical Infrastructures Superintendent



1 Crown-Indigenous Relations and Northern Affairs Canada

1.1 Showing Tank #7 and Tank #8 in Figure 1-1

Comment: Figure 1-1 shows the general location and layout of the Baker Lake Bulk Fuel Storage Facility. CIRNAC notes, however, that while Tank #1 to Tank #6 are clearly shown in the figure, the new Tank #7 and Tank #8 do not appear in the figure.

Recommendation 1: CIRNAC recommends that Figure 1-1 be updated so that Tank #7 and Tank #8 can be clearly identified and shown in the figure.

Agnico Eagle's Response: *An updated satellite photo showing tanks 7 and 8 has been updated for Figure 1-1 of the management plan. The intent of this Figure is to show the general location of the facility and proximity in relation to Baker Lake. To further address CIRNAC's recommendation, an aerial photo of the tank farm has included as Figure 1-2 of the management plan.*

1.2 Monitoring integrity of HDPE membrane liner

Comment: Section 4.3.3 of the Baker Lake Bulk Fuel Storage Facility: Environmental Performance Monitoring Plan states that "(D)ue to the site grading, all contact water from the bulk fuel storage facility is directed inside the HDPE lined secondary containment area. Should the integrity of the liner become compromised, there could be leakage into the below grade soil; this would likely present the greatest source of hydrocarbon contamination to impact groundwater and receiving water." CIRNAC concurs with the Licensee on the importance of the integrity of the HDPE membrane liner and notes the absence of any measures to monitor the integrity of the HDPE membrane liner in the Environmental Performance Monitoring Plan.

Recommendation 2: CIRNAC recommends that the Baker Lake Bulk Fuel Storage Facility: Environmental Performance Monitoring Plan (Version 6) be updated to include monitoring and preventive measures on ensuring the integrity of the HDPE membrane liner in the Baker Lake Bulk Fuel Storage Facility.

Agnico Eagle's Response: *Monitoring related to the integrity of the HDPE membrane is included as part of the visual and operational inspections as detailed in Section 5.1 of the management plan. The Environmental Department is conducting inspections on a weekly basis which is increased to twice weekly during Freshet and summer months. Monthly inspections are also conducted by the Energy and Infrastructure Department. Both department's inspections include the visual monitoring of the HDPE liner. An annual geotechnical inspection is also conducted annually by a third party to evaluate the site drainage, secondary containment, and an environmental assessment of the bulk fuel storage facility. This third-party inspection also includes assessment of the integrity of the*



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HDPE liner. If a non-conformity is found, recommendations are added in the third-party Geotechnical Inspection Report and Agnico Eagle provides an action plan to resolve the non-conformity in the Geotechnical Implementation Plan, both documents are submitted as part of the Meadowbank Complex Annual Report. To resolve CIRNAC's comment, Agnico Eagle has added more detail in Section 4.3.3 outlining, the preventive measures taken to ensure the integrity of the HDPE liner. Such preventative measures include, limiting access into the area and prohibiting snow removal within secondary containments to avoid accidental damage to the HDPE liner. Additionally, water levels within the secondary containment kept to minimal levels to preserve the lifespan of the liners.

1.3 Monitoring and leak detection

Comment: It is stated that the Baker Lake Bulk Fuel Storage Facility: Environmental Performance Monitoring Plan is “(T)o adequately assess the environmental performance of the bulk fuel storage tank at Meadowbank this report provides: a summary of the design, installation, operation and maintenance that follows the CCME (2003) Environmental Code of Practice for Aboveground Storage Tank Systems Containing Petroleum and Allied Petroleum Products; a summary of the location and environmental setting; a summary of the NWB Type A water license requirements; and an environmental assessment to support the recommended environmental monitoring for the ongoing evaluation of the secondary containment.”

Part 6 of the CCME (2003) Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products prescribes the specific requirements for the monitoring and detection of leaks within a storage tank system.

CIRNAC notes the lack of specifics regarding monitoring and leak detection in the Baker Lake Bulk Fuel Storage Facility: Environmental Performance Monitoring Plan. It is not clear if and how the specific requirements for the monitoring and detection of leaks within a storage tank system as prescribed in the CCME (2003) Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products are being fulfilled and/or met.

Recommendation 3: CIRNAC recommends that the Baker Lake Bulk Fuel Storage Facility: Environmental Performance Monitoring Plan (Version 6) be updated to address the specific requirements prescribed in Part 6 of the CCME (2003) Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products.

Agnico Eagle's Response: *Agnico Eagle has updated section 5.1 of the Baker Lake Bulk Fuel Storage Facility: Environmental Performance Plan to include specifics on and adherence to monitoring and leak detection of aboveground storage tanks and aboveground piping as prescribed in Part 6 of the CCME (2003) Environmental Code of*



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Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products. This section includes details for in-service monitoring, periodic leak detection, and criteria if a leak is suspected for applicable aboveground storage tanks and aboveground piping respectively.