AGNICO EAGLE

August 4, 2022 NWB File: 2AM-MEA1530

Nunavut Water Board
PO Box 119
Gjoa Haven, Nunavut X0B 1J0

Re: Response to Comments on Fuel Tank Addition under Type A Water Licence 2AM-MEA1530

Dear Mr. Dwyer,

Agnico Eagle Mines Limited (Agnico Eagle) thanks the Nunavut Water Board, Crown-Indigenous Relations and Northern Affairs Canada, and Environment and Climate Change Canada for the opportunity to respond to the Comments received regarding the addition of a fuel tank under Water Licence 2AM-MEA1530.

As requested, please find attached Agnico Eagle's responses which are intended to address the comments and recommendations received.

Should you have any questions regarding this letter, please do not hesitate to contact the undersigned.

Sincerely,

Jamie Quesnel
Director, Permitting & Regulatory Affairs
Agnico Eagle Mines Limited

Interested Party:	**CIRNAC**	**Rec No.:**	**R-01**
Re:	**Design Report**		

Recommendation Made by Interested Party:
CIRNAC has reviewed the Design Report for Meadowbank Mine New 3.3 ML Fuel Tank provided by AEM and has no comments at the moment.

CIRNAC is satisfied with the information provided by AEM in the Design Report.

Agnico Eagle's Response to Recommendation:
Agnico Eagle appreciates the review of CIRNAC.

Interested Party:	CIRNAC	Rec No.:	R-02
Re:	Minor Spill Mitigation Plan		

Recommendation Made by Interested Party:
CIRNAC recommends that AEM provide a comprehensive Spill Mitigation Plan that details operational procedures put in place to prevent or reduce the incidences of major and minor spill events in the Meadowbank Complex.

Agnico Eagle's Response to Recommendation:
Agnico Eagle agrees with CIRNAC that the first step in spill contingency planning is to take actions to prevent spills from occurring. In Section 2.1 of the Spill Contingency Plan, prevention and inspections for the Meadowbank Complex is outlined; therefore, Agnico Eagle does not believe a stand-alone spill mitigation plan is needed for prevention of a major and minor spill. Details outlined in Section 2.1 of the Spill Contingency Plan are provided below.

Training and inspection measures include, but are not limited to:

- Prior to site arrival, each employee is required to complete a series of E-learning modules, which includes spill prevention training.
- Site orientations are conducted with all new employees upon their arrival at site and spill prevention and response is discussed in detail.
- Each employee is required at minimum to undergo WHMIS training to have a basic understanding of hazards in the workplace.
- Daily worksite inspections are conducted to identify measures to minimize the risk of spills. As well as weekly formal inspections completed by the Environmental Department to audit facilities handling or storing hazardous materials (Appendix A of the Spill Contingency Plan).
- Each employee is equipped with a workcard that must be completed daily. This tool is used to assess work-site safety and focuses on inspection of site conditions, including the presence of hazardous materials and spills, prior to starting any work.
- Annually, a geotechnical inspection of the tank farm is conducted by an external firm, and any areas of concern are brought to Agnico Eagle management directly. The results of these inspections are submitted to the NWB annually alongside the implementation plan.
- Procedure in place for refueling and handling of chemical tote

The following general principles for spill prevention:

- Provide up-to-date and accessible Material Safety Data Sheets (SDS) for all hazardous materials;
- Regular inspections of fuel/chemical storage areas for leaks (including flex connectors and plumbing) and platform shifting;

- Regular inspections of hazardous materials storage areas;
- Train workers in the use of safe work procedures for hazardous materials, and procedures to clean-up spills;
- Encourage workers to take reasonable measures to prevent spills;
- Keep drums/containers sealed or closed when not in use;
- Place drums/containers within a suitable form of secondary or spill containment that could adequately contain the contents of the drum/container in the event of a spill;
- Keep “overpack” or “salvage” drums nearby to contain leaking drums;
- Keep storage areas secure from unauthorized access;
- Segregate incompatible materials;
- Ensure chemical storage areas are adequately protected from weather and physical damage by adhering to SDS and WHMIS storage guidelines; and
- Provide adequate spill response materials at storage areas (details of spill response equipment are outlined in Section 8).

In addition, action and mitigation measures in place to help prevent spills related to the tank farm specifically are provided in the Bulk Fuel Storage Facility Monitoring Plan. These include, but are not limited to:

- All tanks will be built/installed in accordance with the CCME Environmental Code of Practice for Aboveground Storage Tank Systems Containing Petroleum and Allied Petroleum Products (2003).
- Visual inspections are conducted by the environmental department once per week and monthly manual or electronic dip tests are conducted for inventory reconciliation by Procurement Department. Staff will inspect the bulk fuel storage facilities pad for: tank and piping condition, secondary containment berm structure and integrity, indicators of liner damage, precipitation/ run-off accumulation, evidence of tampering or misuse, any structural abnormalities and visible sheens on contact water pools and crush material inside the secondary containment.
- During the period of re-filling, there is the greatest risk of over-filling. Through regular visual inspections, inventory control and monitoring fuel transfer, the risk of over-filling is significantly reduced.

Interested Party:	**ECCC**	**Rec No.:**	**R-01**
Re:			

Recommendation Made by Interested Party:
ECCC has reviewed the proposed modification and does not have any comments to provide at this time.

Agnico Eagle's Response to Recommendation:
Agnico Eagle appreciates the review of ECCC.