Crown-Indigenous Relations and Northern Affairs Canada
Relations Couronne-Autochtones et Affaires du Nord Canada

Water Resources Division
Resource Management Directorate
Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence
2AM-MEL1631
Our file - Notre référence
CIDM#1287597

August 14, 2020

Mr. Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: licensing@nwb-oen.ca

Re: Crown-Indigenous Relations and Northern Affairs Canada Reply to Agnico Eagle Response to Additional Comments on 2AM-MEL1631 Design Report for Saline Effluent Treatment Plant (SETP) Upgrade and Operation & Maintenance Manual.

Dear Mr. Dwyer,

Thank you for your July 31, 2020 email invitation to confirm if Agnico Eagle (AEM) response addresses Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) additional comments on the above-noted design report and operation & maintenance manual.

CIRNAC reviewed AEM response and would like to provide the following additional comments to the Nunavut Water Board (NWB) or consideration.

1. Treatment Objectives of SETP: pH

CIRNAC appreciates AEM's further clarification of its position on this issue and has no further comment to provide to the NWB at this time.

2. Treatment Objectives of SETP: Total Dissolved Solids

In response to CIRNAC's further comments on this issue, AEM revised Section 3.6 of the design report as:

> "***3.6 PH AND TDS ATTENUATION TANK***
> *Treated waters (both from SETP GAC filters and Actiflo) and treated CP1 contact water flow into the pH and TDS attenuation tank where pH and TDS are adjusted. Sulfuric acid will be used for pH adjustment in this reactor.*

> *The strategy of TDS attenuation will be the primary process for managing TDS concentrations. Various contact water sources at site – including Underground and Surface Contact Water – are combined, at times, to minimize overall site footprint and to support long term environmental management at site*."

CIRNAC notes that AEM intends, when necessary, to reduce the TDS of saline groundwater by dilution with treated surface contact water from CP1 only, rather than treatment via a "TDS adjustment reactor".

CIRNAC would like to remind AEM that *Amendment #1* of *NIRB Project Certificate #006* authorizes the discharge of only saline effluent (salty or saline groundwater) from the Tiriganiaq Underground Mine into the marine environment at Melvin Bay near Rankin Inlet. It does not appear to include any surface water in the effluent. Should the proposed approach for saline effluent TDS reduction fall outside of the scope of the approved project, appropriate approvals from other authorities and regulatory agencies would be required.

CIRNAC appreciates the opportunity to participate in this review. If there is any question, please contact me at (867) 975-4555 or david.zhong@canada.ca.

Sincerely,

David Zhong
Regulatory and Science Advisor