



NWB Tools

Richard Dwyer <richard.dwyer@nwb-oen.ca>

Raw sewage spill reporting quantity

Eric Giroux <eric.giroux@agnicoeagle.com>

Thu, Feb 24, 2022 at 4:30 PM

To: Sergey Kuflevskiy <sergey.kuflevskiy@nwb-oen.ca>

Cc: Richard Dwyer <richard.dwyer@nwb-oen.ca>, Sara Savoie <sara.savoie@agnicoeagle.com>

Thanks a lot Sergei,

This confirms what I thought. We will update our management plans accordingly.

Regards,



Eric Giroux, P. Eng., M.Sc. | Environment Superintendent
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Agnico Eagle Mines Limited - Meliadine Mine, Suite 879 - Rankin Inlet, Nunavut, Canada X0C 0G0
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Sent from Meliadine

From: Sergey Kuflevskiy <sergey.kuflevskiy@nwb-oen.ca>

Sent: Thursday, February 24, 2022 4:54 PM

To: Eric Giroux <eric.giroux@agnicoeagle.com>

Cc: Richard Dwyer <richard.dwyer@nwb-oen.ca>; Sara Savoie <sara.savoie@agnicoeagle.com>

Subject: Re: [EXTERNAL] Re: Raw sewage spill reporting quantity

Hi Eric,

To answer your question regarding spills, I would suggest talking to the GN and CIRNAC about that. Not sure about the GN, but the manager of CIRNAC's Inspection Division is Justin Hack (justin.hack@canada.ca). You can also try calling the GN/NWT Spill Reporting Line.

With respect to your question about the camp, our Meliadine Licence does not restrict on a number of people you can accommodate at the camp, as long as you are within the approved limits for water consumption.

And with respect to your question regarding Landfarm, I think this would be a feasible option, since you are already approved to dispose of sewage sludge at the Landfarm, as long as the volumes are not enormous. So I would suggest including this component into all applicable plans and O&M Manuals with submission of to the next annual report.

Sergey



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 Merci de penser à l'environnement avant d'imprimer ce courriel / Thank you for thinking of the environment before printing this email

Regards,



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Sent from Meliadine

From: Eric Giroux
Sent: Tuesday, February 15, 2022 5:57 PM
To: Sergey Kuflevskiy <sergey.kuflevskiy@nwb-oen.ca>; Richard Dwyer <richard.dwyer@nwb-oen.ca>
Cc: Sara Savoie <sara.savoie@agnicoeagle.com>
Subject: RE: [EXTERNAL] Re: Raw sewage spill reporting quantity

Thanks a lot.

From what I have seen, we report everything and most of the time it's at least 31 m away from water bodies. I guess, we need to direct again our question to the GN and CIRNAC as we want to know if a Spill Follow-up Report is required for raw sewage. We have been difficulties to get an answer. Do you have a contact person we could reach?

And, on another topic, camp capacity; my understanding is that we are not restricted on a number of persons but rather in terms of water consumption and treatment. There is no mention of an exact number of people for our camp capacity in our amended water Licence 2AM-MEL1631. We planned for 680 people in our FEIS and we mentioned 720 in our August 2020 approved STP Design Report. In comparison, our Licence B (Exploration Camp) stipulates a camp capacity of 75 persons. Do I understand properly that we could increase our camp capacity under License A (mine site) for a certain construction period?

Thank you for your help.



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agnicoeagle.com    
Sent from Meliadine

From: Sergey Kuflevskiy <sergey.kuflevskiy@nwb-oen.ca>
Sent: Tuesday, February 15, 2022 5:25 PM
To: Richard Dwyer <richard.dwyer@nwb-oen.ca>
Cc: Eric Giroux <eric.giroux@agnicoeagle.com>
Subject: [EXTERNAL] Re: Raw sewage spill reporting quantity

CAUTION: EXTERNAL

Hi Eric,

The specific Licence provisions that regulate unauthorized spills are as follows:

Part H, Item 8: The Licensee shall, subject to Section 16 of the *Regulations*, report any unauthorized deposits or foreseeable unauthorized deposits of waste and/or discharges of Effluent, and:

- a. Employ the *Spill Contingency Plan*;
- b. Report the incident immediately via the 24-Hour NWT/NU Spill Reporting Line (867) 920-8130 and to the Inspector at (867) 975-4284; or at and
- c. For each spill occurrence, submit a detailed report to the Inspector, no later than thirty (30) days after initially reporting the event, which includes the amount and type of spilled product, the GPS location of the spill, and the measures taken to contain and clean up the spill site.

Part H, Item 9: The Licensee shall, in addition to Part H, Item 8, regardless of the quantity of release of a harmful substance, report to the 24 hour NWT/NU Spill Reporting Line, if the release is near or into a Water body.

As you can see, a spill of any size should be reported if this spill is near or into the water body, which is often the case.

If the spill is on-land more than 31 m away from the water body and you want to know the exact thresholds, then I would suggest contacting the GN or CIRNAC Inspector to ensure what exactly they will be checking for during such spills.

The Licence mainly ensures that all necessary documentation is submitted on time, however, the specifics for each submission can be found through the GN and CIRNAC Inspection unit.

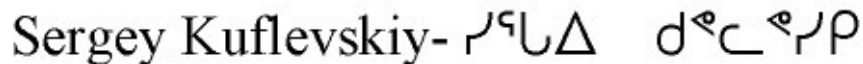
In any case, the Guide states: "*If in doubt as to whether or not a spill should be reported, it is recommended to report the incident.*"

Although Schedule B of the SCP&R Regulations does not explicitly include sewage, my guess would be that anything more than 5L or 5kg should be reported, but please confirm with the GN or CIRNAC.

Let me know if you have any other questions.

Regards,

Sergey



NUNAVUT WATER BOARD - OFFICE DES EAUX DU NUNAVUT
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Richard Dwyer - ʀɪˈtʃɪd ˈdwaɪə - he\him\his

Manager of Licensing- Responsable des permis
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----- Forwarded message -----

From: Eric Giroux <eric.giroux@agnicoeagle.com>

Date: Mon, Feb 14, 2022 at 6:38 PM

Subject: Raw sewage spill reporting quantity

To: Richard Dwyer <richard.dwyer@nwb-oen.ca>

Hello,

I am new at my position, I want to make sure we do things properly at Meliadine...

When I was reviewing your "CONTINGENCY PLANNING AND SPILL REPORTING INNUNAVUT" (https://www.gov.nu.ca/sites/default/files/spill_planning_and_reporting_guide_0.pdf) and I have a question about what is highlighted in yellow:

SPILL REPORTING

The Spill Contingency Planning and Reporting Regulations for Nunavut include the requirement to report spills of contaminants in excess of specified quantities. The minimum reportable quantities in Schedule B are listed by type of contaminant. For consistency, descriptions of the different types of contaminants come from the Transportation of Dangerous Goods Act (TOG). Contaminants not described in the TOG Act are usually in "Other contaminants". An example is lube oil. There may be times when the volume of spilled material is close to the reportable quantity or you are not sure if the spilled material is classified as a contaminant. If in doubt as to whether or not a spill should be reported, it is recommended to report the incident. As noted in clause 11(2) of the regulations, you cannot delay the reporting of a spill because you do not have all of the required information. Remember, the Act requires you to clean up any spill and to notify any member of the public who may be affected by the incident, regardless of whether the spill is reportable or not.

For raw sewage spills, what is the quantity that needs to be reported?

Transportation Class	Type of Substance	Compulsory Reporting Amount
1	Explosives	Any amount
2.1	Compressed gas (flammable)	Any amount of gas from containers with a capacity exceeding 100 L
2.2	Compressed gas (non-corrosive, non-flammable)	Any amount from containers with a capacity exceeding 100 L
2.3	Compressed gas	Any amount
2.4	Compressed gas (corrosive)	Any amount
3.1, 3.2, 3.3	Flammable liquid	100 L
4.1	Flammable solid	25 kg
4.2	Spontaneously combustible solid	25 kg
4.3	Water reactant solids	25 kg
5.1	Oxidizing substances	50 L or 50 kg
5.2	Organic peroxides	1 L or 1 kg
6.1	Poisonous substances	5 L or 5 kg
7	Radioactive substances	Any amount
8	Corrosive substances	5 L or 5 kg
9.1 (in part)	Miscellaneous substances	50 L or 50 kg
9.2	Environmentally hazardous	1 L or 1 kg
9.3	Dangerous wastes	5 L or 5 kg
9.1 (in part)	PCB mixtures of 5 ppm or more	0.5 L or 0.5 kg
None	Other contaminants	100 L or 100 kg

^[10] Nunavut Environmental Protection Act, Consolidation of Spill Contingency Planning and Reporting Regulations R-068-93.
Note: PCB = polychlorinated biphenyls; ppm = parts per million.

Thank you



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