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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

File: 2AM-WTP1830/B14, D1

October 27, 2021

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Subject: Landfarm Design and Management Plan; Type “A” Water Licence 2AM-WTP1830, Whale Tail Pit Project; Agnico Eagle Mines Limited

Dear Alexandra Ozaruk and Jamie Quesnel:

The Nunavut Water Board (NWB or Board) received from Agnico Eagle Mines Limited (Agnico Eagle or Licensee) on August 30, 2021 the documents entitled “Whale Tail Pit - Landfarm Design and Management Plan” dated August 2021 (Plan) and “Whale Tail Pit - Landfarm Design and Management Report” (Report) dated August 27, 2021 as the requirements of Part B, Item 14 and Part D, Item 1, respectively, of Water Licence No: 2AM-WTP1830 (Licence) that was approved by the Minister of Crown-Indigenous Relations and Northern Affairs Canada on May 12, 2020.

The documents were distributed for interested parties’ review with a deadline for submissions set for September 28, 2021. Comments were received from Crown-Indigenous Relations and Northern Affairs (CIRNA) and Environment and Climate Change Canada (ECCC) on September 28, 2021.

CIRNA requested that the Licensee clarify the parties responsible for activities and reporting on them in Table 6.2 of the Report.

ECCC recommended that Agnico Eagle

- *Identify the constituents contained in aviation fuel (Jet A) and indicate whether these constituents are amenable to landfarming; and*
- *Clarify whether and how the proposed soil remediation criteria and effluent discharge criteria address all contaminants of potential concern that may be present in aviation fuel (Jet A).*

On October 13, 2021, the Licensee responded with an updated Table 6.2 of the Report. In addition, the Licensee noted:

According to the Safety Data Sheet (SDS), Jet A is composed of a complex mixture of petroleum hydrocarbons, with the primary constituent being kerosene. Kerosene is a petroleum hydrocarbon and is included in The Federal Contaminated Sites Landfarming Guidelines as a suitable contaminant type for remediation.

Appendix 3 of the Government of Nunavut (GN) Guidelines for Contaminated Site Remediation (GN, 2009) explains that “Petroleum products typically contain thousands of compounds in varying proportions”. Therefore, it is unreasonable to identify all constituents contained in Jet A. However, trace constituents of note that could potentially be included in Jet A are as follows: benzene, toluene, ethylbenzene, xylene, and naphthalene.

Benzene, toluene, ethylbenzene, and xylene (BTEX) are referenced in the Whale Tail Landfarm Management Plan in Table 3. The concentration of these substances will be tested in accordance with the GN Remediation Guidelines prior to any removal of soil from the landfarm.

The Board acknowledges that the Report addresses the requirements of Part D, Item 1 of the Licence. The Licensee is advised that the Board's review of this document is a verification that the proposed activity is consistent with the existing terms and conditions of the Licence and more specifically with Part D, Item 1, and may proceed in accordance with the Report and drawings provided. It should be noted that the Board's acceptance is NOT intended or offered as any representation regarding the suitability of the plans nor third party verification of the design, construction, planning or engineering discussed in the document.

In addition, the Board acknowledges that the document entitled “Whale Tail Pit - Landfarm Design and Management Plan” dated August 2021 addresses the requirements of the Licence.

Should you have any questions, please feel free to contact the undersigned at (867) 360-6338 or assol.kubeisinova@nwb-oen.ca at your earliest convenience.

Regards,

Assol Kubeisinova
Technical Advisor

cc: Distribution List - Meadowbank