



January 23rd, 2019

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

Re: Agnico Eagle Mines – Whale Tail Project Responses to Sewage Treatment Plant Design Report Comments

Dear Mr. Dwyer,

As requested, the following responses are intended to address the comments made in the below letter:

- CIRNAC – January 10, 2019, Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) response to Agnico Eagle Mines Limited's (AEM's) Sewage Treatment Plant Design Report – Whale Tail Pit Project under AEM's Type "A" Water Licence No. 2AM-WTP1826.

Should you have any questions or require further information, please do not hesitate to contact me.

Best regards,

Marie-Pier Marcil
Marie-pier.marcil@agnicoeagle.com
819-759-3555 x5836
Senior Compliance Technician



1 Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)

1.1 Comment 1

Comment 1: Section 2.3 of the STP design report states “the STP is design(ed) for a maximum camp occupation of 400 persons. The water consumption assumed per person is selected at 240 L/day/person.” Section 3.1.5.2 of the Water Management Plan (September 2018) states “the sewage treatment system will be designed based on a flow rate of 200 L per day per room for a peak load of 210 rooms, for an average daily flow rate of 42 m³ (1.75 cubic metres per hour [m³/hour]). As already installed on site for the Exploration Camp, additional Bionest Kodiak biological reactor units are envisioned to be installed to treat camp waste water and accommodate for a total of 350 rooms.”

Recommendation 1: CIRNAC requests clarification on the maximum number of persons and the volume per day per person the STP is designed for, as the STP design report and the Water Management Plan state different volumes per day and maximum number of people in camp.

Agnico Eagle’s Response:

The current STP is designed for 400 persons and the daily water treatment rate is set at 240 L/day/person (96 m³/days). The selection of these design criteria were used considering 37% contingency compared to the value presented in the water management plan (350 persons at 200 L/day/person equivalent of 70 m³/day). The contingency factor use in the current STP design allows Agnico to face any unplanned temporary increase of people at the camp. This also allow Agnico to treat any water accumulated after a major maintenance on the STP. According to the water management plan, the camp capacity is set at 350 persons.

1.2 Comment 2

Comment 2: Part F: Item 3 of the Water License states “the Licensee shall dispose of all sludge removed from the Sewage Treatment Plant and Wastewater Treatment Plant in the Waste Rock Storage Facility or the Tailings Storage Facility or in a landfarm as a nutrient amendment in accordance with Wastewater Treatment System Operation and Maintenance Plan, dated December 2015, as approved by the Board.” Section 4.5 of the STP design report states “excess sludge will be trucked to Meadowbank and disposed of in the Tailings Storage Facility (TSF) or shipped south for disposal.”

Part F: Item 12 of the Water Licence indicates the Licensee will provide the “site-specific Operation and Maintenance Manual(s) for the Wastewater Treatment Plant(s), including the Sewage Treatment Plant, at least ninety (90) days prior to the Construction/installation of facilities, prepared in accordance with the “Guidelines for the Preparation of an Operation and Maintenance Manual for Sewage and Solid Waste Disposal Facilities in the Northwest Territories; 1996”. The Manual(s) shall include sludge management and disposal information and contingency measures in the event of plant malfunction.”



Recommendation 2: CIRNAC requests a copy of the STP Operation and Maintenance Manual be provided to the NWB at least 90 days prior to the start of construction/installation of facilities. In the STP Operation and Maintenance Manual, CIRNAC requests clarification on where the excess sludge will be disposed, as shipping south for disposal is currently not an option per the water licence.

Agnico Eagle's Response:

Agnico has submitted the Sewage Treatment Plant Operation and Maintenance Manual (OMM) on January 11, 2019 as per NWB Water License 2AM-WTP1826. An updated version of the OMM will be provided following the regulator's review period ending on February 11, 2019. The reviewed version will include the current CIRNAC's comments.