



Water Resources Division  
Nunavut Regional Office  
Iqaluit, NU X0A 0H0

Your file - Votre référence  
2AM-WTP1826

February 11, 2019

Our file - Notre référence  
CIDM# 1240473

Richard Dwyer  
Manager of Licensing  
Nunavut Water Board  
Gjoa Haven, NU X0B 1J0

Sent via email: [licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca)

**Re: Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)  
response to Agnico Eagle Mines Limited's (AEM's) Sewage Treatment Plant  
Operation and Maintenance Manual – Whale Tail Pit Project under AEM's  
Type "A" Water Licence No. 2AM-WTP1826.**

Dear Mr. Dwyer,

Thank-you for the email notice to interested parties, received on January 11, 2019, regarding AEM's Sewage Treatment Plant (STP) Operation and Maintenance (O&M) Manual at the Whale Tail Pit Project.

CIRNAC reviewed and provided comment on AEM's STP O&M Manual pursuant to its mandated responsibilities from the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Indian Affairs and Northern Development Act*.

### **Comment 1**

Section 4.3 states if there is a major problem or failure in the STP, one of the contingent measures is *"bypassing untreated STP influent around the malfunctioning unit and holding this untreated influent in a holding tank or lined pond on site until the repairs are complete is another contingent measure that could be applied."*

CIRNAC requests clarification on where the holding tank or lined pond is located, if the holding tank or lined pond is already available, and what the holding volume is. If the holding tank or lined pond is not already available, what is the immediate contingency if there is a major problem or failure in the STP?

### **Comment 2**

Section 3.11 of the STP O&M Manual states *"according to the water licence, Group 1 parameters should be analyzed four times per calendar year during operation and closure."* Table 2 of the water licence states a monitoring program frequency of *"four*





*times per calendar year” for the STP.*

CIRNAC requests the intent of the water licence is honoured by changing the word ‘should’ to ‘shall’ in the sentence “*according to the water licence, Group 1 parameters should be analyzed four times per calendar year during operation and closure*” in Section 3.11.

### **Comment 3**

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 3.3 of the STP O&M states “*excess sludge will be trucked to Meadowbank and disposed of in the Tailings Storage Facility (TSF) or shipped south for disposal.*”

CIRNAC requests clarification on where the excess sludge will be disposed, as shipping south for disposal is currently not an option as per the water licence.

If you have any questions or require further information with respect to this matter, contact me at (867) 975-3877 or email [michelle.blade@canada.ca](mailto:michelle.blade@canada.ca), or Godwin Okonkwo at (867) 975-4550 or email [godwin.okonkwo@canada.ca](mailto:godwin.okonkwo@canada.ca).

Regards,

Michelle Blade  
Regional Coordinator, Water Resources, Nunavut Regional Office