



February 19th, 2019

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

Re: Agnico Eagle Mines – Meadowbank Division Responses to Sewage Treatment Plant Operation and Maintenance Manual Comments

Dear Mr. Dwyer,

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

- ECCC – February 11, 2019, 2AM-WTP1826 – Agnico Eagle Mines Ltd. – Whale Tail – Sewage Treatment Plant Operation & Maintenance Manual
- CIRNAC – February 11, 2019, 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.

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

Best regards,

Marie-Pier Marcil

Marie-Pier Marcil
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819-759-3555 x 4105836
Senior Compliance Technician



1 Environment and Climate Change Canada (ECCC)

1.1 Group 1 Paramaters

Reference:

- Section 3.11 – General Operation & Maintenance, Sampling Procedures and Frequency. Operation & Maintenance Manual – Sewage Treatment Plant.
- Water Licence 2AM-WTP1826 Modification: Schedule I, Table 1 – Monitoring Group, Table 2 – Monitoring Program.

Comment 1: The Group 1 Parameters listed in Section 3.11 do not align with the December 2018 modification of Schedule I of the Water Licence. Orthophosphate and total phosphorus are not included in the Group 1 parameters but were added to Group 1 as per the December 2018 modification of Schedule I of the Water Licence.

Recommendation 1: ECCC recommends that the Proponent add orthophosphate and total phosphorus to the Group 1 Parameters listed in Section 3.11 of the Operation & Maintenance Manual (Page 26).

Agnico Eagle's Response:

Agnico Eagle acknowledge ECCC's comment and updated the STP OMM to add orthophosphate and total phosphorus to Section 3.11.



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

2.1 Comment 1

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.”

Recommendation 1: 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?

Agnico Eagle’s Response:

Currently, no pond or tank are available on site for contingency storage. In case of a major problem, sucker truck will collect sewage from the equalization tank and will send it to Meadowbank facilities. Sewage will be then stored into the Tailing storage facility or will be treated into the sewage treatment plant (STP) at Meadowbank depending on the available capacity remaining. If this is not enough, all water use in the camp will be shut down temporarily until the repairs are completed.

2.2 Comment 2

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

Recommendation 2: 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.

Agnico Eagle’s Response:

Agnico Eagle acknowledge CIRNAC’s comment and updated the STP OMM Section 3.11 to: ‘according to the water licence, Group 1 parameters shall be analyzed four times per calendar year during operation and closure’.



2.3 Comment 3

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.”

Recommendation 3: 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.

Agnico Eagle’s Response:

Agnico Eagle acknowledge CIRNAC’s comment and updated the STP OMM to provided clarification on the sludge disposal. The sludge will be disposed at Amaruq or Meadowbank site into in the Waste Rock Storage Facility or the Tailings Storage Facility at Meadowbank or in a landfarm as a nutrient amendment as per the license recommendations. No sludge will be shipped south for disposal.