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NUNAVUT WATER BOARD
NUNAVUT IMALIRIYIN KATIMAYINGI
OFFICE DES EAUX DU NUNAVUT

File: 2AM-WTP1826 / TR / F12

February 27, 2019

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Subject: Operation & Maintenance Manual Sewage Treatment Plan; Type “A” Water Licence 2AM-WTP1826, Whale Tail Pit Project, Agnico Eagle Mines Limited

Dear Ms. Marcil and Mr. Quesnel:

The Nunavut Water Board (“NWB”) received from Agnico Eagle Mines Limited (Agnico Eagle or Licensee) on January 11, 2019 the Operation & Maintenance Manual Sewage Treatment Plant dated December 2018 (STP O&M Manual) for Board approval as required under Part F, Item 12 of the Water Licence 2AM-WTP1826 (Licence) that was approved by the Minister of Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) on July 11, 2018.

The Sewage Treatment Plant’s purpose is to treat domestic sewage from the camp and adjacent building.

As stated by Agnico Eagle the O&M Manual summarizes the operational and maintenance procedures to be followed at the Sewage Treatment Plant, as specified under Water Licence 2AM-WTP1826 Part F, Item 12 and includes the following requirements:

- *The manual was prepared based on the “Guidelines for the Preparation of an Operation and Maintenance Manual for Sewage and Solid Waste Disposal Facilities in the Northwest Territories, 1996”, and adapted for the use of a mechanical contact water treatment facility;*
- *The manual includes contingency measures in the event of a plant malfunction; and*
- *The manual includes sludge management procedures.*

As reported, this manual is a component of the Whale Tail Environmental Management System. The objectives of this plan are summarized as follows:

1. To define the location, design and operating procedures to be used in the treatment of sewage generated at the Project; and
2. To provide monitoring requirements for the STP.

The STP O&M Manual was distributed for a public review on January 11, 2019, requesting comments be submitted from interested parties by February 11, 2019. On February 11, 2019, comments were received from Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) and Environment and Climate Change Canada (ECCC).

In its submission, CIRNAC provided three comments, the first requesting clarification and specifics on procedures for *“bypassing untreated STP influent around the malfunctioning unit,”* the second requesting a word change from “should” to “shall,” to ensure analyzing of Group 1 parameters occur four times per year, and the third requesting clarification on *“where the excess sludge will be disposed, as shipping south for disposal is currently not an option as per the water licence.”*

ECCC provided one comment recommending that *“the Proponent add orthophosphate and total phosphorus to the Group 1 Parameters listed in Section 3.11 of the Operation & Maintenance Manual,”* to align with the December 2018 modification of Schedule 1 of the Water Licence.

On February 19, 2019, Agnico Eagle provided a response and updated Operation & Maintenance Manual Sewage Treatment Plant dated February 2019, addressing CIRNAC and ECCC recommendations. Agnico Eagle specified in their response to CIRNAC’s first comment that *“in case of a major problem, sucker truck will collect sewage from the equalization tank and will send it to Meadowbank facilities.”* If there is not enough capacity at Meadowbank facilities, *“all water use in the camp will be shut down temporarily until the repairs are completed.”* To CIRNAC’s second comment, they responded by updating the wording to read *“Group 1 parameters shall be analyzed four times per calendar year during operation and closure.”* To address CIRNAC’s third comment, Agnico Eagle stated that *“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”* and that *“no sludge will be shipped south for disposal.”*

Agnico Eagle specified in their response to ECCC that *“they have updated the STP OMM to add orthophosphate and total phosphorus to Section 3.11.”*

On February 20, 2019, CIRNAC confirmed that they are satisfied with Agnico Eagle’s responses to their comments. On February 25, 2019, ECCC also confirmed that they are satisfied with Agnico Eagle’s responses to their comments.

The Board has reviewed the STP O&M Manual and related submissions, and finds the STP O&M Manual functional and generally satisfying Licence requirements, and by copy of this letter has approved the Operation & Maintenance Manual Sewage Treatment Plant dated February 2019

through the Board Motion No. **2019-A1-029**, dated February 27, 2019, as required by Part F, Item 12 of Licence.

Should you have any questions or require any clarification with respect to the above, please feel free to contact the undersigned via email at Derek.Donald@nwb-oen.ca or phone (867) 360-6338 (Ext. 32).

Sincerely,

NUNAVUT WATER BOARD

A handwritten signature in blue ink, consisting of stylized initials 'DD' followed by a surname.

Derek Donald
Technical Advisor

Attachment: Comments by CIRNAC and ECCC

Cc: Distribution list – Meadowbank