

September 14th, 2022

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

Re: NWB File No. 2BB-BOS1727 Opportunity to address comments received regarding Agnico Eagle Mines Ltd's "2BB-BOS1727 Bulk Fuel Storage Facility design"

Agnico Eagle Mines Ltd (Agnico Eagle) appreciates the opportunity to provide supplementary information regarding this project on the following topics:

CIRNAC comments

 CIRNAC comment: AEM provided the schedule of the activities with regard to the pad upgrade, installation of the tanks and commissioning in section 1.3 of the design report, but did not mention in the schedule when the recertification of the reused tanks will take place.

<u>CIRNAC recommends</u> that AEM clarify when the recertification of the reused tanks is scheduled to happen.

<u>Agnico Eagle Response:</u> The inspection for the tanks' recertification was conducted in July / August 2022.



 CIRNAC comment: AEM stated that it has retained the services of a specialized firm that will carry out the certifications but did to provide the details of the firm.

<u>CIRNAC recommends</u> providing details of the specialized firm retained to carry out the inspection and recertification, e.g. Names, registration and certification status of the firm etc.

Agnico Eagle Response: The inspection was conducted by SPEQ GLOBAL, which is a firm specialized in internal and external above ground storage tank inspection and repair located in Alberta. SPEQ GLOBAL's corporate certificate is provided in attachment.

The inspectors are certified API 653 Aboveground Storage Tank inspectors. A copy of their API certifications is provided in attachment.

3. <u>CIRNAC comment:</u> There is a risk of the runoff water from the pad being contaminated with the hydrocarbon, but AEM did not provide any detail how the runoff water will be managed. It is unclear if AEM is planning to build a channel that would convey the runoff water to the treatment pond where the potential contaminated water will be treated or threat the runoff water independently.

<u>CIRNAC recommends</u> that AEM clarify how they intend to manage the runoff water emanating from the fuel farm pad.

Agnico Eagle Response:

As per design:

The tanks of the fuel farm will be double-walled and considered self contained ULC approved horizontal tanks. As per Code (ref: NFCC art. 4.3.7.1 and art. 4.3.7.4), there is no need for an additional secondary containment for the tanks to prevent contamination from a tank failure.



The tanks will be installed within impervious spill basins type "Insta-Berm". Those spill basins are made with chemical-resistant and fire-resistant fabrics. The spill basins will be installed under and all around the tanks. They will provide protection against a spill during hose handlings and also an additional (not required) protection against a tank failure.

The runoff water in contact in the impervious spill basins is considered potentially contaminated (contact-water). Contamination can occur in case of a spill during hose handlings. The impervious spill basins will have a slight slope. Rainwater will accumulate at the low point within each spill basin and will be pumped regularly to the water treatment pond already in service at the camp site. The water in the pond is tested prior to discharge into the environment.

The runoff water emanating from outside the spill basins is considered to be "non-contact" water and will not be treated.

David Frenette

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Environmental Coordinator