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1 June 2012

EC file: 4703 001 062
NWB file: 2BB-MEL0914

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board
PO Box 119
Gjoa Haven, NU X0B 1J0

Via email: licensing@nunavutwaterboard.org

RE: Agnico-Eagle Mines (AEM) Amendment 4 to Water License 2BB-MEL0914

AEM has submitted an amendment to their Type B water license for their Meliadine exploration camp to permit construction of an on-site non-hazardous solid waste landfill. AEM had been disposing their camp waste at Rankin Inlet's landfill but given the large amount of waste being generated, they ceased this practice in July 2011 and have been stockpiling their non-hazardous waste on site. Given that the stockpile is quite voluminous, AEM requires a more permanent solution for management of this waste.

AEM plans to site the landfill in what will be the tailings management area if the mine is approved. The landfill will be designed to accommodate approximately 800 m³ to 1600 m³ of waste and will operate for 4 years.

EC reviewed the supporting material for the amendment, including the amended license application, supplementary Questionnaire for Advanced Exploration and the Landfill Design and Management Plan. EC does not have any major concerns related to the design and management of the landfill but offers the following comments for the Board's consideration:

Landfill location

As per p.10 of the Landfill Design and Management Plan, EC notes AEM plans to site the length of the landfill perpendicular to the prevailing wind direction. Figure 2 of the Plan shows the landfill length running in a southeast to northwest direction. Climate normals (http://www.climate.weatheroffice.gc.ca/climate_normals/) for the Rankin Inlet weather station indicate that winds blow predominantly northwest in this area so the length of the landfill, as currently planned, is coincident with the predominant wind direction. Considering the foregoing, AEM may want to reconsider the orientation of its landfill to diminish the risk of windblown waste.

Secondary Containment for Hazardous Waste

As stated in the Landfill Design Plan, EC acknowledges AEM's plans to store hazardous waste materials in secure facilities until they can be backhauled for off-site recycling or disposal at an approved facility in another provincial or territorial jurisdiction. Under section 23 of the license amendment application, EC notes that an INAC inspector reported non-compliance with storage of fuel, oil and chemicals in secondary containment. According to this section, AEM has resolved this issue. However, EC noted that the Landfill Design and Management Plan did not implicitly state that hazardous substances will be stored within secondary containment. To this end, EC recommends the Proponent store any hazardous materials within secondary containment.

If you require any further clarification related to the above advice, please do not hesitate to contact me at (867) 975-4639.

Sincerely,

A handwritten signature in blue ink, appearing to read "Allison D", followed by a long horizontal line.

Allison Dunn
Sr. Environmental Assessment Coordinator

cc: Carey Ogilvie (Head, Environmental Assessment-North, EPO, EC, Yellowknife, NT)
Anne Wilson (Senior Sector Expert, EPO, EC, Edmonton, AB)