



June 30, 2020

Eva Walker
Environmental Assessment Coordinator
Environment and Climate Change Canada
Yellowknife, Northwest Territories
X1A 2P7

Re: Agnico Eagle Meadowbank Incinerator Stack Testing Reduction Frequency

Dear Ms Walker,

Stack testing frequency at the Meadowbank's incinerator was changed in 2010 to every other year, following discussions with Environment and Climate Change Canada, as the waste stream has not changed and remain constant. Testing occurred in 2012 and no results exceeded the Environment Canada Guideline for mercury and dioxine/furane. In 2014, results from the Meadowbank's incinerator stack testing indicated that mercury level average ($64.09 \mu\text{g} / \text{Rm}^3 @ 11 \% \text{v/v O}_2$) exceeded the Environment Canada guideline ($20 \mu\text{g} / \text{Rm}^3 @ 11 \% \text{v/v O}_2$). As a result, an investigation with Meadowbank's Energy and Infrastructure department was performed to determine the potential sources of this exceedance. Although Agnico had an alkaline battery recycling program, the investigation revealed that there could be a significant volume of batteries disposed of along with regular solid waste destined for the onsite incinerator. As a result, Agnico committed to conduct confirmatory stack testing in the summer of 2015 and implemented a comprehensive site wide information program to reinforce the requirements of the battery recycling program. It was also determined that a possible source of batteries going to the wrong disposal route was ones used around the living/camp facilities. Thus, the information provided to employees included flow chart on disposal within camp use. Information was posted on the Agnico intranet site, was discussed during meetings conducted by the Environmental Department and copies of the proper batteries disposal charts were distributed in all the dorm wings. This flowchart describes how batteries should properly be disposed of onsite. Waste management technical memos were also published on Agnico intranet and sent to all contractors and employees. Ongoing toolbox meetings on waste management were also held with different departments to continue education and improve awareness of employees and contractors.

In accordance with Agnico's Incinerator Waste Management Plan (Version 8, October 2018), stack testing returned to annual testing for five (5) years following the 2014 exceedance. Stack testing were done yearly from 2015 to 2019 and results are all below the emission standard, as show in Table 1 below. As five years data has been accumulated with all results reported below the Level of Quantification (emission standard), Agnico is requesting ECCC the authorization to reduce the



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stack testing frequency and return to a biennial schedule, and thus the next stack testing will occurred in 2021.

Table 1. Meadowbank 2010- 2019 Stack Testing Results

Year	Mercury ($\mu\text{g}/\text{Rm}^3$ @ 11% v/v O_2)		Dioxins and Furans (ng/Rm^3 @ 11% v/v O_2)	
	GN Standard	Stack Testing Results (Average)	GN Standard	Stack Testing Results (Average)
2010	20	0.09	0.08	0.028
2012		<0.10		0.040
2014		64.09		0.054
2015		<0.22		0.021
2016		<0.46		0.033
2017		3.80		0.022
2018		<0.19		0.010
2019		0.45		0.027

R: Reference conditions 25 °C and 101.3 kPa on a dry basis

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

Regards,

Agnico Eagle Mines Limited – Meadowbank Division

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Environment General Supervisor