
HAMMOND REEF GOLD PROJECT RESPONSE TO COMMENTS ON FINAL EIS/EA

COMMENT –A-10

Source: Canadian Environmental Assessment Agency

Summary of Comment

In EC's review of the proposed mitigation measures for air quality and greenhouse gases, we feel that the Proponent has provided some information but no details in terms of: objectives to be achieved through air quality mitigation measures; listing of methods to be applied and the conditions that trigger mitigation measures; frequency and record keeping to demonstrate adoption of actions; best management plan for fugitive dust; and planning measures aimed at reducing fuel and power consumption for the site.

The Proponent should be advised that compliance with the following regulations and code of practice will help to ensure that emissions are reduced throughout all phases of the Project:

Vehicle and fuel regulations addressing air pollutants and GHGs:

- On-road vehicle and engine regulations that establish maximum levels for a number of pollutants including particulate matter and ozone precursors such as NOx and VOCs:
- On-Road Vehicle and Engine Emission Regulations:
<http://laws-lois.justice.gc.ca/eng/regulations/SOR-2003-2/index.html>
- Off-road diesel engine emission regulations that also control these air pollutants. These have been recently updated to align with US EPA's Tier 4 regulations:
- Off-Road Compression Ignition Engine Emission Regulations:
<http://laws-lois.gc.ca/eng/regulations/SOR-2005-32/index.html>
- Sulphur in gasoline and in diesel regulations are in place that ensure that the fuel will not impede the effective operation of advanced emissions control technologies installed on vehicles and engines (technologies such as particulate filters):
 - Sulphur in Gasoline Regulations:
<http://laws-lois.gc.ca/eng/regulations/SOR-99-236/index.html>
 - Sulphur in Diesel Fuels Regulations:
<http://laws-lois.gc.ca/eng/regulations/SOR-2002-254/index.html>
- Passenger Automobile and Light Truck Greenhouse Gas Emission Regulations, SOR/2010–201; 74, aligned with the U.S., setting progressively stricter GHG emissions standards for 2011-2016 model years:
<http://laws-lois.gc.ca/eng/regulations/SOR-2010-201/index.html>
- Heavy-duty Vehicle and Engine Greenhouse Gas Emission Regulations, SOR/2013-24, apply to 2014 and later model years.
<http://laws-lois.gc.ca/eng/regulations/SOR-2013-24/index.html>

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- Renewable Fuels Regulations, SOR/2010–189;
<http://laws-lois.gc.ca/eng/regulations/SOR-2010-189/index.html>
- Management practices for reducing emissions from mine fleet equipment including compliance with EC's off-road diesel engines regulations and use of tier 4 technologies and engine operation and maintenance guidelines as per EC's Environmental Code of Practice for Metal Mines (2009).
<http://www.ec.gc.ca/lcpe-cepa/default.asp?lang=En&n=CBE3CD59-1>

The following guidance document prepared for EC by ChemInfo Services is a valuable source of information on air quality mitigation (for example on the use of water and dust suppressants to mitigate fugitive dust from site preparation, storage piles, unpaved roads, etc.):

- "Best Practices for the Reduction of Air Emissions from Construction and Demolition Activities" (ChemInfo, 2005).

A copy of this document can be provided to the Proponent if requested.

Proposed Action

Submit the BMP and other mitigation plan documents for review to EC and other regulatory agencies prior to commencing work for the construction phase.

Reference to EIS

EIS Report, Chapter 8, Table 8-2 pg.8-11;

AETSD Report, Section 3.3 and Table 3-20; pgs. 44-45

Response

The applicable regulations and code of practice to ensure that emissions are reduced throughout all phases of the Project are noted.

As typically required by mining facilities' Environmental Compliance Approvals, Canadian Malartic Corporation will prepare a Fugitive Dust Best Management Practices Plan (BMPP) and Operations and Maintenance Manual (O&M Manual) for all equipment subject to approval by the MOE under Section 9 of Ontario's *Environmental Protection Act*. The O&M Manual will include emergency control procedures for mill equipment. The BMPP and O&M Manual will be shared with MOE and EC for discussion prior to the construction phase, and will be implemented throughout the construction and operation of the Project.