COMMENT – A-11

Source: Canadian Environmental Assessment Agency

Summary of Comment

The Proponent states:

- “The ore stockpiles will be protected with ditching to control runoff” (S 5.1.2).
- Low-Grade Ore Stockpile: “Runoff from the stockpile will be collected in a perimeter ditch system, with all collected flows pumped to the PPCP” (S 5.2.1.3).
- Overburden Stockpile: “Runoff from the stockpile will be collected in perimeter ditch system, with the collected water pumped to the PPCP for use as re-claim in the plant or treatment and discharge” (S 5.2.3).

The Proponent states:

- “The results of the existing water quality program are compared to:
  - Ontario Provincial Water Quality Objectives (PWQO) (MOEE 1999).
  - Canadian Council of Ministers of Environment, Canadian Water Quality Guidelines (CCME CWQG) for the protection of aquatic life (CCME 2007).
  - Municipal/Industrial Strategy for Abatement (MISA) Effluent Monitoring and Effluent Limits for the Metal Mining Sector Ontario Regulation 560/94” (S 2.2).
- “Effluent discharge from the Project site must comply with the MISA Effluent Monitoring and Effluent Limits – Metal Mining Sector (O.Reg. 506/94), however, PWQO and CCME CWQG are receiving water guidelines and are not directly applicable to site discharge” (S 4.5).

- “Under operating conditions, results of the water quality model runs, for all scenarios under all climatic conditions indicate that the water quality at the potential discharge points, including site and natural runoff, the site discharge (reclaim tank) and seepage from the TMF, will meet MISA discharge guidelines” (S 4.5.1).

Proposed Action

The Proponent must meet the requirements of the Metal Mining Effluent Regulations and must demonstrate that it has the necessary measures and controls to ensure compliance with the Metal Mining Effluent Regulations.

Reference to EIS

Hammond Reef Gold Project Environmental Impact Statement (EIS) Section (S) 5.1.2 Operations Phase S 5.2.1.3 Low-Grade Ore Stockpile S 5.2.3 Overburden Stockpile

Hammond Reef Gold Project Site Water Quality TSD S 2.2 Guidelines and Indicators S 4.5 Site Discharge and Mitigation S 4.5.1 Construction and Operations
Response

Overburden and ore will be stockpiled on site, mine rock will be placed in the Waste Rock Management Facility (WRMF) and tailings will be placed in the Tailings Management Facility (TMF). The Project plan is to ensure that the net drainage from these areas during construction, operations, closure, and following closure will not be acidic and will be protective of the receiving environment (i.e., waters from these areas will not constitute a deleterious substance within the context and application of criteria defined within the Metal Mine Effluent Regulations (MMER)).

Although not expected at this site, to manage deleterious substances, if any were to occur, Canadian Malartic Corporation has agreed to construct a perimeter ditching and containment system as described in the Final EIS/EA Report. This system is considered effective at a conceptual level as determined through preliminary hydrogeologic modelling.

It is fully expected that any effluent discharged from the site and any seepage from the WRMF, overburden, or TMF would be compliant with O.Reg 560/94 and MMER regulatory limits. However, if any seepage is found to not be compliant with O.Reg 560/94 and MMER, additional seepage control measures, or modifications to seepage control measures (i.e., additional ditching or collection pumping) would be installed on an as required basis to ensure protection of receiving waters.

Further detail on the water quality assessment in the context of the MMER and the preliminary hydrogeologic modelling is provided in the attached memorandums entitled ‘Tailings Management Facility, 3D Groundwater Modelling’ and ‘Water Quality Background Information’, which are also provided in Part D of the Addendum to the Version 3 EIS/EA, provided as Attachments 3 and 4, respectively of this Final EIS/EA Report Addendum.