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

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### COMMENT – T-16

**Source:** Canadian Environmental Assessment Agency

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#### Summary of Comment

Proponent is requested to confirm if background concentrations have been included in the modelling results (it appears they have not, from Table 3-19, pg. 43 of AESTD Report).

Proponent is requested to revise Table 3-19 to include additional columns to show existing background for each substance, a column for predicted point of impingement (POI) concentrations for emissions from mobile sources and a column for total combined concentrations from background, predicted POI for stationary and mobile sources. Table 3-16 page 41 should be revised accordingly.

The Proponent is requested to consider PM<sub>10</sub> and PM<sub>2.5</sub> contaminants of concern and that they are assessed and included in the table. It also requires combined predicted cumulative air quality concentrations during the various project phases with suitably conservative estimates of background concentration.

The validity of an air quality assessment and conclusions about the significance of impacts (including cumulative effects) depend on a clear presentation of baseline data, inclusion of substances of concern and inclusion of all the relevant sources.

As part of the cumulative effects assessment, the Proponent states that potential emissions from the Atikokan Generating station were considered and all of the emissions and sources of emissions were used as inputs to the AERMOD model (EIS Report, Version 2, page 6-223). A table should be provided indicating what emission rates were used as input to the model and identify the location of the emission sources, as the information was not found in the documents.

#### Proposed Action

Revise and finalize the air quality results table incorporating the changes listed in the previous column. The current tables do not contain all the information (e.g. background, mobile source emissions).

Provide an emission rate and source table from Atikokan Generating Station that was used for dispersion modeling as part of the cumulative effects assessment.

Confirm that air quality monitoring will be undertaken by the Proponent during all phases of the project to ensure that appropriate mitigation action is implemented to ensure that applicable guidelines are met.

#### Reference to EIS

AESTD Report Section 3.2.3 Air Quality Assessment

EIS Report, Chapter 6, Pg. 6-223 (Atikokan Generating Station)

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#### Response

Tables presented in response to comment MOE-Air 2 include baseline values, where available, as well as combined ambient air concentrations (baseline + maximum modelled Project predictions) in each of the air quality study areas. These values were compared to the applicable federal criteria. The maximum modelled

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Project predictions include emissions from all significant sources, including mobile emissions. This data was passed on to be assessed in the Human Health and Ecological Risk Assessment (HHERA) and air quality was not identified as a significant risk at the human health receptors.

At the time the Final EIS/EA was issued, the Atikokan Generating Station (AGS) was not operational and was not considered in the Cumulative Effects Assessment. The AGS is now operational as a biomass-fuelled plant. However, due to the distance between the AGS and the Project, there will likely be limited interaction between the AGS and the Project activities. As a precaution, air quality predictions were provided at the Town of Atikokan, which is further away from the Project than the AGS, and results showed that limited interaction or changes to air quality would occur at that location. Further detail is provided in Part B of V2 of the Atmospheric TSD. Again, this data was passed in to be assessed in the HHERA and air quality was not identified as a significant risk at any human health receptors.

Canadian Malartic Corporation has committed to air quality monitoring throughout the Construction and Operations Phase of the Project. A detailed air quality monitoring program will be submitted to the province for discussion prior to the start of the Construction Phase. This plan will consider the guidance outlined in the Ministry's *Operations Manual for Air Quality Monitoring in Ontario*. Canadian Malartic Corporation will work with regulators to determine reasonable parameters and frequency of sampling for monitoring during Operations and Construction Phases.