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

COMMENT – T-33

Source: Canadian Environmental Assessment Agency

Summary of Comment

The short term leach testing and NAG leach test results indicate that the tailings from the Hammond Reef project have metal leaching potential with respect to aluminum, copper, silver, boron, and zinc. For example, the short term leach testing results for tailings indicate that Al concentrations were greater than the CCME aquatic and PWQO guidelines and the NAG leach test results indicate that pH values (in excess of 11) were greater than all applicable criteria. Yet, in the EIS, the Proponent has stated in several instances that there is no metal leaching potential from the tailings.

The statement in the “Public Communications Tracking Log” in Appendix 7.III made by the Proponent that “Geochemical testing has shown that there is no potential for acid rock drainage or metal leaching” may be true for ARD, but it does not appear to be true for metal leaching..

Proposed Action

Using an errata table, indicate all references in the EIS where it states that there is no metal leaching potential in tailings since the geochemical leaching test results for tailings indicate that several parameters will be exceeding the applicable guidelines.

Reference to EIS

Hammond Reef Gold Project Geochemistry, Geology and Soils TSD Section 3.5.2.4 Short-Term Leach Testing
Appendix 7.III (Public Communications Tracking Log)

Response

We have not found any instances in the Final EIS\EA report text or TSD reports where it is stated that there will be “no metal leaching”, it is understood that metal will leach from any materials, be they from a mine, soil, or roadway. The leaching potential of the mine rock and tailings is assessed, and the values used in the impact assessment as defined and developed through the Geochemistry Geology and Soils TSD; Site Water Quality TSD; and Aquatic Environment TSD and Human Health and Ecological Risk Assessment TSD.

It is noted in the “public communications tracking log” in two instances (Appendix 7.III, Page 23 and Page 36) where the presenter did state “no metal leaching” and it is considered that this was a result of a non-technical paraphrasing of the technical information and that the intent was to state that there would be “no adverse effects as a result of metal leaching”.

It should be noted that it is stated in the document there will be “no adverse effects as a result of metal leaching”. This statement is based on the results of the overall impact assessment, and include consideration of all factors as described in Geochemistry Geology and Soils TSD; Site Water Quality TSD; and Aquatic Environment TSD and Human Health and Ecological Risk Assessment TSD.

Of note is that it is clearly stated in the executive summary of the Final EIS/EA Report, under the Geology, Geochemistry and Soils section “Relative to comparison criteria, waste rock and tailings samples leachate

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concentrations were slightly elevated for aluminum with sporadic concentrations of other metals such as arsenic, copper cadmium, iron, selenium, vanadium and zinc slightly greater than the comparison criteria. Where these sample values are above the comparison criteria, additional water quality evaluation within an overall site wide context has been conducted as described in the site water quality evaluation.”