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

COMMENT – T-18

Source: Canadian Environmental Assessment Agency

Summary of Comment

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.

Proposed Action

Confirm that the requirements of regulations and codes of practice stated in the previous column will be incorporated into the Best Management Plan (BMP) for dust, greenhouse gas (GHG) emission plan and other mitigation actions

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

Canadian Malartic Corporation will prepare and implement a Best Management Practices Plan (BMPP) for Fugitive Dust as well as fulfill accounting and reporting requirements, if any, under provincial and federal GHG regulations.

The preparation and submission of the Canadian Malartic Corporation BMPP to the MOE will likely be a condition on the Environmental Compliance Approval (ECA) required for the Project. Canadian Malartic Corporation's BMPP will be prepared in accordance with the MOE requirements and the conditions outlined in the ECA.

All BMPPs typically include the following as a minimum:

- (1) identification of the main sources of fugitive dust emissions such as:
 - (a) on-site traffic;
 - (b) paved roads/areas;
 - (c) unpaved roads/areas;
 - (d) material stock piles;
 - (e) loading/unloading areas and loading/unloading techniques;
 - (f) material spills;
 - (g) material conveyance systems;
 - (h) exposed openings in process and storage buildings; and
 - (i) general work areas.
- (2) potential causes for high dust emissions and opacity resulting from these sources;

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(3) preventative and control measures in place or under development to minimize the likelihood of high dust emissions and opacity from the sources of fugitive dust emissions identified above. Details of the preventative and control measures shall include:

- (a) a description of the control equipment to be installed;
- (b) a description of the preventative procedures to be implemented; and/or
- (c) the frequency of occurrence of periodic preventative activities, including material application rates, as applicable.

(4) an implementation schedule for the Best Management Practices Plan, including training of facility personnel;

(5) inspection and maintenance procedures and monitoring initiatives to ensure effective implementation of the preventative and control measures; and

(6) a list of all Ministry comments received, if any, on the development of the Best Management Practices Plan, and a description of how each Ministry comment was addressed in the Best Management Practices Plan.

Canadian Malartic Corporation will also consider reporting under the following GHG programs, as applicable to the Project:

- Ontario's GHG Emissions Reporting Regulation (O.Reg.452/09)
- Government of Canada GHG Emissions Reporting Program (the GHGRP)
- Carbon Disclosure Project