

Annex A2: Note to Readers

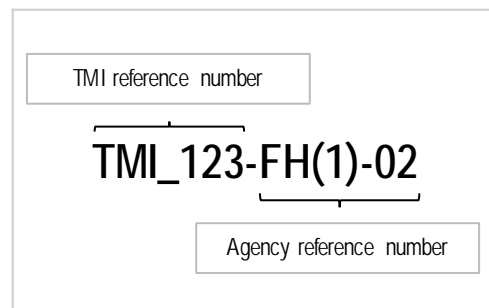
Introduction

In April 2015, Treasury Metals Inc. (Treasury Metals) submitted an Environmental Impact Statement (EIS) for the proposed Goliath Gold Project (the Project) to the Canadian Environmental Assessment Agency (the Agency) for consideration under the Canadian Environmental Assessment Act (CEAA), 2012. The Agency reviewed the submission and informed Treasury Metals that the requirements of the EIS Guidelines for the Project were met and that the Agency would begin its technical review of the submission. In June 2015, the Agency issued a series of information requests to Treasury Metals regarding the EIS and supporting appendices (referred to herein as the Round 1 information requests). The Round 1 information requests included questions from the Agency, other federal and provincial reviewers, First Nations and other Aboriginal peoples, as well as interested stakeholders. As part of the Round 1 information request process, at the request of the Agency, Treasury Metals has consolidated the responses to the information requests into a revised EIS for the Project.

In total, there were 859 questions and comments divided into 4 annexes:

- Annex 1: Questions and comments for the Agency and other government reviewers.
- Annex 2: Questions and comments from government reviewers regarding the permitting process for the Project. Treasury Metals have yet to start the formal permitting process for the Project.
- Annex 3: Questions and comments from First Nations and other Aboriginal peoples.
- Annex 4: Questions and comments from interested stakeholders.

The enclosed document provides the final responses to 64 of the Round 1 information requests included as Annex A2. For ease of cross-referencing, each information request response has been provided a unique identifier comprised of a sequential TMI reference number (from 266 to 329 of the 859 information requests) and the IR reference number provided in the packages forwarded to Treasury Metals by the Canadian Environmental Assessment Agency (the Agency). The naming convention is illustrated below.



On October 5, 2017, The Canadian Environmental Assessment Agency indicated that 287 of the 859 questions raised as part of the Round #1 Information Request process (contained in Annexes A1 to A4 of IR#1) were found to be incomplete. The enclosed document provides the original responses to the 572 responses deemed complete, and revised responses for the 287 information requests requiring additional information to be considered complete. The responses are provided in a tabular form, with each response including the original "Summary of Comment / Rationale" and the "Information Request", for reference. Those responses initially identified as complete are

indicated with “Response”, while the expanded responses for the 287 identified by the Agency are indicated by “Revised Response”. In preparing the response package, there were some requests that require the provision of figures, tables and attachments that did not lend themselves to inclusion in the response tables. This information is appended to this response package, with the information presented in the order it is cited.

Index for Annex A2 Information Request Responses

To guide the users in locating specific responses, the next section of this document provides an index of where each of the responses are located, or where the response is referenced in another response. The index makes use of the unique identifier described above.

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TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
266	RG(1)-01	Environment Canada	EIS Table 12.4.2 (p. 12-9)	Section 12	<p><u>Summary of Comment / Rationale:</u> The proponent specifies that fish tissue analysis will be conducted for areas affected by stream realignments and referenced areas. Under the MMER a mine is required to conduct a study respecting fish tissue (downstream of project discharge and reference area) if during effluent characterization a concentration of total mercury in the effluent is $\geq 0.10 \mu\text{g/L}$.</p> <p><u>Information Request / Comment:</u> A. Table 12.4.2 should reflect the requirements of the MMER as described in the summary comment.</p> <p><u>Response:</u> Inclusion of fish tissue metal analysis in Table 12.4.2 of the original EIS is an error. Section 13.14.2.2 (Biological Monitoring) of the revised EIS states “Monitoring of mercury in fish is not expected to be required under the MMER due to low mercury concentrations in effluent ($<0.10\mu\text{g/L}$), pending confirmation of effluent testing.”</p>
267	RG(1)-02	Environment Canada	Appendix II	Sections 8.1, 10.1, 10.2, 11	<p><u>Summary of Comment / Rationale:</u></p> <p><u>Information Request / Comment:</u> The proponent has not provided estimated costs for the Fish Habitat Compensation Strategy. The estimated costs associated with the development, implementation and monitoring of the proposed strategy, a key mitigation measure for the project, should be presented to regulators and stakeholders for consideration during the EA. This is a requirement of the “Streamlining the Approvals Process for Metal Mines with Tailings Impoundment Areas” (https://www.ec.gc.ca/pollution/default.asp?lang=En&n=EFAD32D1-1).</p> <p>A. Provide the estimated costs for the development, implementation and monitoring of the Fish Habitat Compensation Plan.</p> <p><u>Response:</u> The specifics of the fish habitat compensation (offsetting) plan have not yet been developed and consequently costs have not yet been estimated. No specific Project offset has been proposed at this time. However, Section 5 of Appendix II to the revised EIS (Draft Fisheries Compensation Strategy and Plans) states that “[n]o current locations for in-kind offset habitat locations have been selected due to non-finalized Project design, and lack of First Nation and public input”. Treasury Metals goes on to state the following in Section 5.2.1 of Appendix II to the revised EIS regarding watershed based enhancements: “This approach [watershed based enhancements], suggested by the local OMNRF, would be focused on reversing long term impacts of slumping and</p>

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					<p>sedimentation of Wabigoon Lake. The specific locations of these sites and where offset activities would be best placed will require consultation with OMNRF, First Nations, and public stakeholders. Restoration techniques may include bank stabilization, and where appropriate, armoring. The proposed strategy would be designed to work with current FMP goals.”</p> <p>Section 5.2.3 of Appendix II discusses a “blended approach” to offsetting fish habitat impacts associated with the Project, which would see the offsetting plan include both watershed based improvements to Wabigoon Lake and “...in-kind habitat development within the Blackwater Creek system. The combined effort of both these opportunities would provide the opportunities for an effective balance in support of local fisheries initiatives, and achieving the desired offset quantities under current DFO policies.”</p> <p>Since the submission of the original EIS, Treasury Metals has been refining their understanding of fish and fish habitat impacts in the study area. As a result, potential offsetting requirements and measures will be re-examined. Treasury Metals, as part of the continued engagement of the Project will engage Fisheries and Oceans Canada (DFO), Environment Canada (EC), and the Ministry of Natural Resources and Forestry (MNRF) in defining the offsetting strategy as part of the Fish Management Plan and in estimating the cost of that strategy.</p>
268	RG(1)-03	Environment Canada	Appendix II	Sections 8.1, 10.1, 11.1	<p>Summary of Comment / Rationale: Appendix II states: “No current locations for in-kind offset habitat locations have been selected due to non-finalized Project design, and lack of First Nation and public input into the design of the NNLP.”</p> <p>Without this information the impacts of the proposed mine waste disposal alternatives cannot be fully understood, and therefore it cannot be determined if the proposed mitigation measures are appropriate.</p> <p>Information Request / Comment: A. Provide an executive summary of the Fish Habitat Compensation Plan for consultation purposes.</p> <p>Response: The specifics of the fish habitat compensation (offsetting) plan have not yet been developed, and no specific Project offset has been proposed. As stated in Section 5.0 of Appendix II to the revised EIS, “No current locations for in-kind offset habitat locations have been selected due to non-finalized Project design, and lack of First Nation and public input into the design of the NNLP.”</p> <p>Since the submission of the original EIS, Treasury Metals has been refining their understanding of fish and fish habitat impacts associated with the Project. As a result, potential offsetting requirements and measures will need to be re-examined. Treasury Metals, as part of the</p>

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					continued engagement of the Project, will engage Fisheries and Oceans Canada (DFO), Environment Canada (EC), the Ministry of Natural Resources and Forestry (MNRF) and Aboriginal peoples in defining the offsetting strategy as part of the Fish Management Plan.
269	RG(1)-04	Environment Canada	Appendix D EIS Section 2	Sections 3.3, 8.1	<p>Summary of Comment / Rationale: It is not clear whether or not the sensitivity analysis provided in the Alternatives Assessment Report (Appendix D) incorporates feedback from stakeholders as set forth in the EIS Guidelines.</p> <p>Information Request / Comment: A. Provide rationale for the selection of various developed scenarios.</p> <p>Response: For the purposes of evaluating the various alternatives within the Assessment Report, the engagement and feedback from stakeholders at that time were taken into account. The documented interactions and feedback is detailed in Appendix V (Public Engagement) and Appendix DD (Aboriginal Engagement Report) of the revised EIS and summarized in Section 9.0 of the revised EIS. The feedback from stakeholders was used to inform and provide input for the sensitivity analysis of the Alternatives Assessment.</p> <p>Since the submission of the Alternatives Assessment and the original EIS, Treasury Metals continues to make efforts to engage and elicit input from Aboriginal peoples and stakeholders regarding the project. Treasury Metals also recognizes that engagement does not stop with the filing of the EIS but will continue throughout the life of the Project. Treasury Metals will continue to try to engage the Aboriginal group and stakeholders meaningfully with respect to the Project.</p> <p>The Agency requested additional information and details for this response as part of the completeness check of the Round 1 responses. However, this question form part of Annex A2 of the Agency letter received on June 30, 2015. This letter stated that Annex A2: <i>"contains regulatory comments from government reviewers that must be addressed during the federal and provincial regulatory processes, as appropriate, but not necessarily during the EA process. Comments considered supplementary actions for consideration are also included in AnnexA2."</i></p> <p>Additionally, the June 30, 2015 letter goes on to state the following: <i>"In accordance with s.23(2) of CEAA 2012, the Agency requests, at a minimum, that TMI submit complete responses to the requests and comments appearing in Annexes A1, A3 and A4. The timeline is stopped as of June 30, 2015 and will not recommence until the Agency completes the conformity review of the formal submission of responses to the IR-1 and is satisfied that robust responses to the comments and questions have been received."</i></p> <p>Based on the above excerpts, concerns with regards to the Annex A2 responses should not be the basis for delaying the technical review. If additional information or clarification regarding the Annex</p>

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					A2 responses is deemed desirable, it would be reasonable to include such requests as part of a second round of information requests following the technical review process.
270	RG(1)-05	Environment Canada	Appendix D EIS Section 2	Section 8.1	<p>Summary of Comment / Rationale: It is not clear that the pre-screening criterion 5 in the Alternatives Assessment Report (Appendix D) would result in a “fatal-flaw” for a given alternative. Alternatives may be excluded based on distance if the distance between the mill/mine complex and the tailings impoundment area becomes too great to ensure a positive economic outcome to the project. It is unclear how exceeding a “practical” distance would result in a “fatal-flaw” for a given alternative.</p> <p>Information Request / Comment: A. Provide an explanation as to what would constitute a disposal site that exceeds a practical distance from the mill and why it would be a “fatal flaw” for an alternative. B. Provide details as to what distance is deemed economically unviable (i.e., would result in negative overall project economics) and why.</p> <p>Response: The feasibility of any mining project is sensitive to cost. A proposed candidate location that is a significant distance away from the plant infrastructure may result in significant costs to build a road to access the site, in addition to haulage of construction material (potentially from the pit) and pipeline costs or haulage costs for tailings transport. Candidate Site 3 was determined to be too far from production facilities (estimated access road and pipeline alignment of 12 km to the east side of the site), and it was concluded that associated costs with access, construction and deposition may result in an unviable economic project. Detailed financial studies and economic analysis for the Project have not been completed at this time that would allow for a precise conclusion that the location is too far from the production facilities. In addition, there is no reason to investigate alternatives requiring significant additional costs unless there is a reasonable assumption of environmental gains, and as such, it should be eliminated. There are not any identified environmental gains in the selection of Candidate Site 3, and it is therefore eliminated.</p>
271	RG(1)-06	Environment Canada	Appendix D, Tables 4.3-4.4 EIS Section 2	Section 8.1	<p>Summary of Comment / Rationale: The indicator quantity assigned to Alternatives 1C and 6C in Table 4.4. (Appendix D), and throughout the multiple account analysis, for the indicator Pipeline/Access Road Requirements are in question. According to Table 4.3 (Appendix D), existing road infrastructure can be used to haul tailings for these alternatives. Therefore, it is unclear what (and why) additional length of infrastructure would be required.</p>

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					<p><u>Information Request / Comment:</u> A. Clarify Pipeline/Access Road Requirements for the referenced alternatives and explain how this will affect the outcome of the value-based-decision process.</p> <p><u>Response:</u> As part of the revised EIS, a new assessment of alternatives has been developed for the tailings storage facility (TSF) and minewater pond (Appendix D-2 of the revised EIS). For Dry Stack Candidates (Alternative C), although existing roads are present, these roads will be required to be upgraded to facilitate the additional anticipated load requirements. In addition, depending upon the size of the trucks selected to haul the dry stack material, roads may be required to be built solely for the purpose of transport of materials as it may not be acceptable to share the road with public transportation. If this is the case, then costs will increase both for development and operation making this alternative less attractive. Additional details have been provided in TMI_34-AA(1)-15_Attachment_1 regarding the requirements associated with pipeline/access road requirements. The updated tables are included in TMI_34-AA(1)-15_Attachment_2.</p>
272	RG(1)-07	Environment Canada	Appendix D, Tables 4.3-4.4	Section 8.1	<p><u>Summary of Comment / Rationale:</u> The rankings assigned in Table 4.4 (Appendix D) for the following indicators do not correspond to those assigned in Table 4.3 (Appendix D) for the same respective indicators: - Sensitivity to Climate Variability - Risk to Worker Safety - Economic Benefits to Regional Communities - Regional Job Creation and Diversity</p> <p><u>Information Request / Comment:</u> A. Clarify and, if necessary, revise the discrepancy between the information presented in Tables 4.3 and 4.4 (Appendix D) and explain how this will affect the outcome of the value-based-decision process.</p> <p><u>Response:</u> The data has been reviewed, and the discrepancies between the indicators have been corrected so that they correspond to those assigned in Table 4.3 (Appendix D) of the original EIS. The corrected tables have been provided in TMI_34-AA(1)-15_Attachment_2, with documentation of the changes provided in TMI_34-AA(1)-15_Attachment_1. Additionally, Treasury Metals has prepared a revised alternatives assessment for the TSF, which supersedes the previous alternatives assessment (provided in Appendix D-1 of the revised EIS). This additional alternatives assessment has been appended to the revised EIS as Appendix D-2.</p>

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					<p>Please note that Risk to Worker Safety is now described as Risk to Worker Health and Safety as per the response to TMI_37-AA(1)-18. The outcome of the value-based decision process was unaffected with the preferred candidate site and technology remaining the same.</p>
273	RG(1)-08	Environment Canada	Appendix D Tables 4.6, 4.7 EIS Section 2	Sections 3.3, 8.1	<p>Summary of Comment / Rationale: The quantitative analysis in the Alternatives Assessment (AA) Report (Appendix D) has not been completed according to current guidance: http://ec.gc.ca/pollution/default.asp?lang=En&n=125349F7-1</p> <p>According to the guidance, a weighting factor is applied to each indicator based on input from stakeholders. Instead, it appears that in Table 4.6 of the AA (under the “Indicator Weight” column), the proponent has assigned to the ‘indicators’ weightings that are recommended by Environment Canada for ‘accounts’ under Section 2.6.2 of the Guidelines, i.e., Environment – 6; Technical – 3; Project Economics 1.5; and Socio-Economic – 3.</p> <p>This is also the case for sub-account weightings in Table 4.7.</p> <p>Information Request / Comment: A. Assign, for each indicator, a weighting factor (usually between 1 and 6), with appropriate input from the Aboriginal groups and stakeholders in Table 4.6. B. Assign sub-account weightings (under the “Sub-Account Weight” column) for each ‘sub-account’ based on input from the stakeholders. Each weighting factor should have a value between 1 and 6.</p> <p>Response: Treasury Metals are now aware that the quantitative evaluation of tailings disposal options presented in Appendix D to the original EIS will not be sufficient to support an amendment to the Metal Mining Effluent Regulations (MMER), should such an amendment be required. In a parallel process to the preparation of responses to the round 1 information requests, Treasury Metals commissioned Amec Foster Wheeler to undertake a multiple accounts analysis (MAA) of features of the Project that may require an amendment of the MMER, and prepare a report suitable for initiating discussions with the various agencies who would need to be consulted. This work has been undertaken in accordance with current guidance noted in the comment. A report entitled “Draft Assessment of Alternatives for Storage of Mine Waste for the Goliath Gold Project” has been included as Appendix D-2 to the revised EIS. A. As detailed discussed above, Appendix D-2 to the revised EIS includes a Draft Assessment of Alternatives for Storage of Mine Waste for the Goliath Gold Project completed in accordance with</p>

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					<p>the latest guidance. The report is a draft that will be used to initiate engagement and consultation regarding the process for a possible amendment to MMER.</p> <p>B. As detailed discussed above, Appendix D-2 to the revised EIS includes a Draft Assessment of Alternatives for Storage of Mine Waste for the Goliath Gold Project completed in accordance with the latest guidance. The outlines quantitative approach used, is consistent with the latest guidance, and includes sub-account weighting</p> <p>Based on feedback from regional Aboriginal peoples and stakeholders, environmental concerns were of the highest importance and were assigned the highest weighted factor of 6. Technical considerations and socio-economic parameters were of significance and were assigned a weighting factor of 3. The Economic merits were of only minor concern during consultations and were assigned a weighting factor of 1.5.</p> <p>It is coincidental that the weighting factors are the same as provided in the Guidance document provided by Environment Canada (EC) for the Alternatives Assessment.</p>
274	RG(1)-09	Environment Canada	Appendix D	Section 8.1	<p>Summary of Comment / Rationale: Additional information is required in order for the Crown to conduct effective regulatory consultations regarding proposed amendments to Schedule 2 of the MMER.</p> <p>Information Request / Comment: A. Provide the following information which is required for Government of Canada consultations as well as the development of the proposal seeking approval to amend Schedule 2 of the MMER: - the name and location of the water bodies that will be potentially impacted (water bodies to be listed in Schedule 2 of MMER in order to get authorization); - the overall TIA footprint and the size of the water bodies that will be overprinted; - an estimate of the volume of waste to be disposed and stored (after recycling and discharge), and assumptions used in its quantification; and - an Executive Summary of the AA in plain language that can be distributed during consultations, and which includes: - a summary of the above information; - an overview of key environmental effects associated with the TIA and technical and economical mitigation measures proposed (FHSCP +Sec 4.3.2 of the EIS, TMF risk management); and - Reference to the location of the complete document in the EIS (Appendix D).</p> <p>Response: A. Treasury Metals commissioned Amec Foster Wheeler to undertake a multiple accounts analysis (MAA) of features of the Project that may require an amendment of the MMER, and prepare a report suitable for initiating discussions with the various agencies who would need to be consulted. This work has been undertaken in accordance with current guidance noted in the comment. A report entitles "Draft Assessment of Alternatives for Storage of Mine Waste for the Goliath Gold</p>

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					<p>Project" has been included as Appendix D-2 to the revised EIS. This document, prepared in accordance has been developed to specifically support the process for getting an amendment to MMR, should one be required.</p> <p>The Agency requested additional information and details for this response as part of the completeness check of the Round 1 responses. However, this question form part of Annex A2 of the Agency letter received on June 30, 2015. This letter stated that Annex A2:</p> <p><i>"contains regulatory comments from government reviewers that must be addressed during the federal and provincial regulatory processes, as appropriate, but not necessarily during the EA process. Comments considered supplementary actions for consideration are also included in AnnexA2."</i></p> <p>Additionally, the June 30, 2015 letter goes on to state the following:</p> <p><i>"In accordance with s.23(2) of CEAA 2012, the Agency requests, at a minimum, that TMI submit complete responses to the requests and comments appearing in Annexes A1, A3 and A4. The timeline is stopped as of June 30, 2015 and will not recommence until the Agency completes the conformity review of the formal submission of responses to the IR-1 and is satisfied that robust responses to the comments and questions have been received."</i></p> <p>Based on the above excerpts, concerns with regards to the Annex A2 responses should not be the basis for delaying the technical review. If additional information or clarification regarding the Annex A2 responses is deemed desirable, it would be reasonable to include such requests as part of a second round of information requests following the technical review process.</p>
275	RG(1)-10	Environment Canada	EIS Section 11	Sections 8.1, 9.1.2	<p><u>Summary of Comment / Rationale:</u> Pyrites contained in tailings are a significant contributor to acid rock drainage (ARD). A flotation circuit can be employed to remove pyrites within the tailings. This measure could help reduce the potential for ARD even if the overburden cap loses its effectiveness over time and allows water and oxygen to penetrate into the tailings.</p> <p><u>Information Request / Comment:</u> A. Consider assessing the benefits of pyrite removal from the tailings as a measure to reduce the potential for ARD over the long-term in the abandonment phase of the Project.</p> <p><u>Response:</u> A. Flotation and off-site processing of the flotation concentrate was considered in the assessment of alternatives (Section 2.3.4.2, of the original and revised EIS). Work included metallurgical bench scale testing to assess as an option for gold recovery. Ranking of this option was low in particular due to anticipated low gold recovery economics which, includes the additional operating costs associated with the aforementioned processing method.</p>

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					<p>In the event flotation separation were to be employed with on-site processing, the potential benefits aspired to by the reviewer could potentially be realized as long as the sulphide content was sufficiently reduced to produce non-potentially acid generating tailings. However, separate management of the sulphide concentrate tailings would pose its own challenges and could be prone to much higher reactivity including self-heating and rapid sulphide oxidation. This waste sulphide concentrate could be a challenge to manage effectively, and would carry its own long-term risk related to storage.</p>
276	RG(1)-11	DFO	EIS Summary Sections 12.4.2, 12.4.2.12	Section 4	<p><u>Summary of Comment / Rationale:</u> The EIS states that changes to water quality due to release of a deleterious substances into a watercourse could affect fish habitat during operations and that habitat compensation will be provided as per the Fisheries Act. The deposit of a deleterious substance into fish frequented waters is prohibited under subsection 36(3) of the Fisheries Act. A proponent cannot provide compensation (offsetting) in response to a deposit of a deleterious substance, this is an offense under the Fisheries Act, would have to be reported to DFO, and investigated in order to bring the proponent into compliance with the Act. Subsection 38(5) of the Fisheries Act states that should a deleterious substance be deposited or there is the potential for such an incident, the proponent has the duty to notify DFO. Subsection 38(6) requires the proponent of any reported incident to take all reasonable corrective measures to prevent this occurrence or mitigate and remedy any adverse effects.</p> <p><u>Information Request / Comment:</u> A. Clarify if this reference to a deposit or release is with regards to the tailings impoundment area.</p> <p><u>Response:</u> Yes, the reference to the deposit or release of a deleterious substance refers to the tailings storage facility (TSF). Section 12.4.2.12 of the original EIS Summary identified the need for an Authorization under Subsection 35(2) of the Fisheries Act for the “permanent alteration to, or destruction of, fish habitat”. The Project will result in approximately 6 ha of fish habitat loss due to the unavoidable elimination of the tributary watercourse associated with the development of the TSF and the open pit excavation. It discusses the likely requirement for “habitat compensation”, which is now referred to as offsetting under the Fisheries Act, for the loss of habitat. It also indicates that Section 27.1 of the Metal Mining Effluent Regulations (MMER) would require habitat compensation to offset losses of fish habitat associated with the construction of the TSF. The action of overprinting the TSF on a tributary would be referred to as “the deposit of a deleterious substances to a watercourse” under Section 27.1 of the MMER.</p>
277	RG(1)-12	MNRF		Section 5.2	<p><u>Summary of Comment / Rationale:</u></p>

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			EIS Section 1.2.3		<p>Section 1.2.3 (EIS) states: "Additional land deals are being negotiated as of the time of the submission of the environmental assessment (EA)."</p> <p>Information Request / Comment: A. Land ownership/disposition is required to be finalized prior to commencement of any operations.</p> <p>Response: Treasury Metals is working towards acquiring all necessary land ownership and dispositions. Treasury Metals is also aware that operations cannot commence until this has been completed.</p>
278	RG(1)-13	MNR	EIS Table: 1.5.1	Section 5.2	<p>Summary of Comment / Rationale: Table 1.5.1 (EIS, page 1-20) does not include the Ministry of Natural Resources and Forestry's aggregate permit issued under the Aggregate Resources Act (ARA) as a potential permit. The requirement for a permit depends on where the aggregate is obtained. If aggregate is to be obtained from a new source on Crown land, this will require an aggregate permit. If non-acid generating waste rock from the mining operations is used as aggregate, this will not require a permit.</p> <p>Information Request / Comment: A. Be aware of the potential requirement for an aggregate permit under the Aggregate Resources Act and include this in future documentation of permits that may be required.</p> <p>Response: Treasury Metals is aware of the requirement for an aggregate permit under the Aggregate Resources Act and will continue to engage the Ministry of Natural Resources and Forestry (MNR) moving forward as part of the development of the Project.</p>
279	RG(1)-14	MNR	EIS Section 3.14.5	Section 5.2	<p>Summary of Comment / Rationale: Section 3.14.5 (EIS) speaks about the possible development of quarries or pits and reclaimed according to provincial standards. Any pits or quarries developed on Crown land, or Crown leases will require an aggregate permit issued under the Aggregate Resources Act.</p> <p>Information Request / Comment: A. Be aware of the potential requirement for an aggregate permit under the Aggregate Resources Act and include this in future documentation of permits that may be required.</p>

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					<p>Response: A. Treasury Metals is aware of the requirement for an aggregate permit under the Aggregate Resources Act and will continue to engage the Ministry of Natural Resources and Forestry (MNRF) moving forward as part of the development of the Project.</p>
280	RG(1)-15	MNRF	EIS Section 6.4.5.2	Section 12.2	<p>Summary of Comment / Rationale: "Therefore, based on the private land holdings and the SLRA it has been determined that the Project will have no significant effect to hunting and trapping activities within the LSA. Regionally hunting and trapping can continue as per the limits imposed by the OMNRF. No follow-up activities are required." Under hunting and trapping section the line "Regionally hunting and trapping can continue as per the limits imposed by the OMNRF" is incorrect as MNRF does not impose limits on Aboriginal subsistence harvest.</p> <p>Information Request / Comment: A. Consider amending or removing line in this section.</p> <p>Response: The section of the original EIS refers to general hunting and trapping activities in the area, which are subject to the limits imposed by the Ministry of Natural Resources and Forestry (MNRF). The reviewer is correct in pointing out that MNRF does not impose limits for Aboriginal subsistence harvest. This statement has been removed in the revised EIS.</p>
281	RG(1)-16	MNRF	Appendix G Section 8.5.4.2.1.5	Sections 7.1.3, 16	<p>Summary of Comment / Rationale: "Beaver dams and lodges are frequent on Blackwater Creek and Hughes Creek and their tributaries." Due to the year round increase of flow in Blackwater creek, a monitoring plan should be put in plan to ensure Blackwater Creek is not impacted (dammed) by beavers.</p> <p>Information Request / Comment: A. Trapping and killing of the existing beaver and destruction of any beaver dams or beaver lodges should be arranged with the local trappers through the local trapper's council. If arrangements are not made with the local trappers, authorizations will be required through the Ministry of Natural Resources and Forestry.</p> <p>Response: Monitoring and wildlife management will be incorporated within the construction, operations, and closure plans of the Project (see Sections 12.9 and 13.12 of the revised EIS). Treasury Metals has</p>

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					<p>previously engaged the local trapping council for beaver related concerns. Prior to construction activities, Treasury Metals will engage the local trappers council and the Ministry of Natural Resources and Forestry (MNRF) for authorization and planning for removal of beaver within the Blackwater Creek watershed.</p>
282	RG(1)-17	MNRF	<p>Appendix G section 9.3.6.1</p> <p>Appendix F of Appendix M Figure 1.</p>	Section 9.1.2	<p>Summary of Comment / Rationale: Section 9.3.6.1 (Appendix G) states: "Lola Lake Park likely provides the area with significant ecological functions such as groundwater discharge, wildlife habitat and carbon storage (Harris pers. comm. 2011). The presence of iron precipitates (Appendix VII-2, Plate 11) and rich minerotrophic indicators including sticky tofieldia (<i>Triantha glutinosa</i>), tufted clubrush (<i>Trichophorum cespitosum</i>), and creeping juniper (<i>Juniperus horizontalis</i>) indicate that there is a strong flow of nutrient rich groundwater from the peatland (NE to SW) into the ponds at the tree nursery grounds and eventually into Thunder Lake."</p> <p>The hydrogeology of the project area as shown in Figure 1 (Appendix F of Appendix M) includes a portion of Lola Lake Provincial Park, which is an extensive wetland area. It is likely that groundwater flows impact the hydrology of Lola Lake Park and the associated biology. Groundwater is likely to be a factor in Lola Lake Park's hydrology; therefore, the hydrological changes caused by the dewatering of the mine may change the wetland ecosystem. The management direction for this Park requires that the ecosystem be preserved. There is also a high potential for plant and insect species that are rare or Species at Risk to be identified in this Park. MNRF's Mandate: The Lola Lake Provincial Park "Management Statement states: Maintenance of ecological integrity shall be the first priority and the restoration of ecological integrity shall be considered (PPCRA). Restrictions on recreational activities (Section IV) and commercial activities (Section V), as noted above, are expected to provide adequate protection to the life science features. If any unforeseen threats to the preservation of these features arise, appropriate measures and/or restrictions will be implemented through planning."</p> <p>The risk of altering the wetland ecosystem and plant communities within the Park is high.</p> <p>A greater study of the hydrology in Lola Lake Park and adjacent to the Park (the north section of the map in Figure 1) to better determine the impacts to the Park ecology should be done. Also, fen inventories, vegetation, and SAR surveys should be conducted to determine a baseline for this Park before water level changes occur.</p> <p>Information Request / Comment: A. A greater study of the hydrology in Lola Lake Park and adjacent to the Park (the north section of the map in Figure 1) to better determine the impacts to the Park ecology should be done. Fen</p>

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					<p>inventories, vegetation, and SAR surveys should also be done to determine a baseline for this park before water level changes occur.</p> <p>B. The risk is high of altering the wetland ecosystem and plant communities within the Park. Therefore it is strongly suggested that fen inventories and hydrology studies of Lola Lake Provincial Park are conducted to better determine the impact and baseline conditions with an acceptable consultant. If hydrology is determined to be an issue to the long term sustainability of Lola Lake Provincial Park then mitigation measures will need to be considered from a design and operational perspective of the mine site.</p> <p>Response:</p> <p>A. No water level changes as a result of the Project are predicted for the Lola Lake Provincial Park. The Project is located primarily within the Blackwater Creek watershed, which drains into Wabigoon Lake. The Lola Lake Provincial Park is located within the watershed that drains into Thunder Lake Tributary 3, and eventually drains into Thunder Lake via Thunder Lake Tributary 2.</p> <p>As discussed in the response to TMI_146-WL(1)-03, baseline data collection in Lola Lake Provincial Park is not considered warranted as it is not expected that the Project will have any effect on the water levels within the park. It was also noted that there is currently a great deal of information about Lola Lake that was obtained from Parks Canada including historical flora and fauna inventories.</p> <p>B. The current plans for the Project include the potential to take water from the irrigation ponds at the former Ministry of Natural Resources and Forestry (MNRF) tree nursery. Two of these ponds are located on Thunder Lake Tributary 3, which is downstream of Lola Lake. Withdrawing water from the irrigation ponds at the former MNRF tree nursery, which is downstream of the park will not affect the water levels or flows at Lola Lake (see also the response to TMI_84-GW(1)-21).</p> <p>Figures 20 and 21 in Appendix M to the revised EIS illustrate that the zone of influence resulting from the dewatered and fully developed mine does not extend into the Lola Lake Park.</p> <p>Given that the Project is not predicted to affect the water levels or hydrology in Lola Lake Provincial Park, no specific mitigation measures are warranted.</p>
283	RG(1)-18	MNRF	Appendix G Section 9.3.6.1 Appendix F of Appendix M Figure 1.	Section 9.1.2	<p>Summary of Comment / Rationale:</p> <p>Section 9.3.6.1 (Appendix G) states: "Lola Lake Park likely provides the area with significant ecological functions such as groundwater discharge, wildlife habitat and carbon storage (Harris pers. comm. 2011).The presence of iron precipitates (Appendix VII-2, Plate 11) and rich minerotrophic indicators including sticky tofieldia (Triantha glutinosa), tufted clubrush (Trichophorum cespitosum), and creeping juniper (Juniperus horizontalis) indicate that there is a strong flow of nutrient rich groundwater from the peatland (NE to SW) into the ponds at the tree nursery grounds and eventually into Thunder Lake."</p>

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					<p>The hydrogeology of the project area as shown in Figure 1 (Appendix F of Appendix M) includes a portion of Lola Lake Provincial Park, which is an extensive wetland area. It is likely that groundwater flows impact the hydrology of Lola Lake Park and the associated biology. Groundwater is likely to be a factor in Lola Lake Park’s hydrology; therefore, the hydrological changes caused by the dewatering of the mine may change the wetland ecosystem. The proponent also intends to take mine processing water from irrigation ponds fed by tributaries flowing out of Lola Lake Park. There is high potential for plant, reptile, amphibian and insect species that are rare or species at risk to be identified in this park.</p> <p><u>Information Request / Comment:</u></p> <p>A. Conduct fen inventories, vegetation, and SAR surveys to determine a baseline for Lola Lake Park before water level changes occur.</p> <p>B. Describe mitigation measures to ensure long term sustainability of Lola Lake Park’s wetland ecosystem.</p> <p><u>Response:</u></p> <p>A. No water level changes as a result of the Project are predicted for the Lola Lake Provincial Park. Although the Lola Lake Provincial Park is located within the local study area (LSA) used in the original and revised EIS, the park and Lola Lake are located upstream from the Project. There will be no water discharges from the Project that will affect Lola Lake.</p> <p>The current plans for the Project include the potential to take water from the irrigation ponds at the former Ministry of Natural Resources and Forestry (MNRF) tree nursery. Two of these ponds are located on Thunder Lake Tributary 3, which is downstream of Lola Lake. Withdrawing water from these ponds will not affect the water levels or flows at Lola Lake, which is upstream of the Tree Nursery Ponds.</p> <p>To safely operate the open pit and underground, it will be necessary to dewater the mine workings. As a result of the dewatering, there will be a groundwater drawdown in the basal sand/shallow bedrock. The predicted zone of influence (ZOI) for the drawdown is presented in Figure 21 in Appendix M to the revised EIS. The predicted ZOI does not extend to Lola Lake, and it will not be affected by dewatering.</p> <p>As discussed in the response to TMI_146-WL(1)-03, baseline data collection in Lola Lake Provincial Park is not considered warranted as it is not expected that the Project will have any effect on the water levels within the park. It was also noted that there is currently a great deal of information about Lola Lake was obtained from Parks Canada including historical flora and fauna inventories.</p>

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					<p>B. As described in Part A, the Project is not predicted to have an effect on the water levels in Lola Lake Provincial Park. For this reason, no specific mitigation measures are warranted.</p>
284	RG(1)-19	MNRF	Appendix G EIS Section 11.3.5	Section 9.1.2	<p>Summary of Comment / Rationale: Barn swallows are migratory birds that are listed as threatened on the Species at Risk List of Ontario and receive species and habitat protection under Ontario’s Endangered Species Act. As such, barn swallow surveys should be conducted in accordance with MNRF protocols and recommended procedures.</p> <p>Information Request / Comment: A. Complete an Information Gathering Form to provide information on any potential effects to barn swallows on the project site. This includes nesting barn swallows within the old tree nursery buildings, as well as any other nest locations that may be found. In addition, the abandoned structure located at UTM: 528132 E, 5511704 N would be considered high potential habitat for barn swallow.</p> <p>Response: The requisite Information Gathering Form (IGF) and Avoidance Alternatives Form (AAF) have been completed and submitted to the Dryden district Ministry of Natural Resources and Forestry (MNRF) office.</p> <p>The Agency requested additional information and details for this response as part of the completeness check of the Round 1 responses. However, this question form part of Annex A2 of the Agency letter received on June 30, 2015. This letter stated that Annex A2: <i>“contains regulatory comments from government reviewers that must be addressed during the federal and provincial regulatory processes, as appropriate, but not necessarily during the EA process. Comments considered supplementary actions for consideration are also included in AnnexA2.”</i></p> <p>Additionally, the June 30, 2015 letter goes on to state the following: <i>“In accordance with s.23(2) of CEAA 2012, the Agency requests, at a minimum, that TMI submit complete responses to the requests and comments appearing in Annexes A1, A3 and A4. The timeline is stopped as of June 30, 2015 and will not recommence until the Agency completes the conformity review of the formal submission of responses to the IR-1 and is satisfied that robust responses to the comments and questions have been received.”</i></p> <p>Based on the above excerpts, concerns with regards to the Annex A2 responses should not be the basis for delaying the technical review. If additional information or clarification regarding the Annex A2 responses is deemed desirable, it would be reasonable to include such requests as part of a second round of information requests following the technical review process.</p>

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
285	RG(1)-20	MOECC	EIS Sections 2.3.12, 2.3.14	Section 5	<p><u>Summary of Comment / Rationale:</u> Section 2.3.12 (EIS) states that the preferred option for the disposal of non-hazardous waste is trucking the waste to the Dryden landfill facilities, but it was only assumed that the landfills have capacity to serve the project for the life of the mine.</p> <p>Section 2.3.14 (EIS) states that the preferred option for the disposal of domestic sewage is offsite treatment, and that it was assumed that this option provides no capacity constraints. Please note that an Environmental Compliance Approval (ECA) will be required for any onsite treatment facility. It may also be necessary to amend the ECA of the offsite sewage facility.</p> <p><u>Information Request / Comment:</u></p> <p>A. Provide evidence that the Dryden landfill facilities have the capacity to serve the Project for the life of the mine that the mine is located within the approved service area of the landfill facilities, and that the City of Dryden is willing to enter into a waste disposal contract.</p> <p>B. Provide evidence that appropriate domestic sewage facilities exist and have adequate capacity to serve the Project for the life of the mine, or until onsite treatment can be established.</p> <p><u>Response:</u></p> <p>A. Treasury Metals has confirmed with the City of Dryden (personal communication, Colin Hawkins, Operations Manager) that the City of Dryden has the capacity, and is willing to provide landfill services for non-hazardous solid waste (see also response to TMI_287-RG(1)-22).</p> <p>B. Domestic sewage was considered with the original EIS in Section 2.3.14, and Appendix X. Further to this the City of Dryden has confirmed it has the capacity and is willing to provide domestic waste services to the Project (personal communication, Dean Walker, Operations Manager – City of Dryden). Current projected volume of domestic sewage is anticipated to be 10 m³. It is not currently anticipated that the Environmental Compliance Approval of the City of Dryden will require modification. If further domestic sewage facilities are deemed necessary on-site Treasury Metals will re-engage the City of Dryden, or complete the necessary Environmental Compliance Approvals for an on-site facility.</p>

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
286	RG(1)-21	MOECC	EIS Summary Section 4.8	Section 10.3	<p><u>Summary of Comment / Rationale:</u> Section 4.8 (EIS Summary) states: "All fuel and chemical waste will be stored on site in appropriate collection tanks and bins and disposed of in an appropriate off-site facility."</p> <p>The guidelines of the Ministry of the Environment and Climate Change (MOECC) for environmental protection measures at chemical and waste storage facilities (MOECC May 2007) is intended for use by owners/operator/designers of chemical and waste storage facilities and the MOECC. This document will aid the proponent in assessing the necessary environmental protection measures for chemical and waste storage areas and protection measures for human health. This document can be used as a resource during planning of upgrades to existing storage areas and for the design and operation of new facilities.</p> <p>The above mentioned document is what the MOECC expects the proponent to set as the minimum level of protection at chemical and waste storage facilities.</p> <p><u>Information Request / Comment:</u> A. The proponent is encouraged to go beyond the minimum MOECC standard for environmental protection measures at chemical and waste storage facilities (MOECC May 2007).</p> <p><u>Response:</u> Treasury Metals will work with the Ministry of the Environment and Climate Change (MOECC) to ensure that all measures of environmental protection meet or exceed the requirements. Treasury Metals will use the current guidance as defined within Guidelines for Environmental Protection Measures at Chemical and Waste Storage Facilities to serve as a resource during the planning of and design of the Project.</p>
287	RG(1)-22	MOECC MNO	EIS Summary Section 4.8 EIS Section 2.3.12	Section 10.3	<p><u>Summary of Comment / Rationale:</u> Section 4.9 (EIS Summary) states: "Non-hazardous solid waste, such as food scraps, refuse, fabric, metal tins, scrap metal, glass, plastic, wood, paper, and similar materials, will be stored temporarily for subsequent transport to an existing off-site landfill facility. The City of Dryden landfill currently has the capacity to support the future Goliath non-hazardous waste requirements."</p> <p>The following are unclear:</p> <ul style="list-style-type: none"> - whether the City of Dryden is capable of handling solid non-hazardous waste from the site according to the City's environmental compliance approval; - what pressures will this proposed mine site have on existing waste management infrastructure i.e. landfill life expectancy; and - whether the City of Dryden confirmed its willingness to accept solid non-hazardous waste from

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					<p>the Project.</p> <p>If answers to the above suggest the proposed non-hazardous waste management option is not viable, then the proponent should investigate other options in accordance with provincial requirements.</p> <p>Information Request / Comment:</p> <p>A. Ensure the city of Dryden is capable of handling solid non-hazardous waste from the site according to the City's environmental compliance approval.</p> <p>B. Identify and report the pressures this proposed mine site will have on existing waste management infrastructure (i.e. landfill life expectancy).</p> <p>C. Confirm the city of Dryden is willing to accept solid non-hazardous waste from the Project.</p> <p>D. If the proposed non-hazardous waste management option is not viable, then identify an alternative in accordance with the requirements of the province of Ontario.</p> <p>Response:</p> <p>A. The City of Dryden has confirmed (personal communication, Colin Hawkins, Operation Manager – City of Dryden) that it is capable of handling the projected solid non-hazardous waste. This increased volume is within the current guidelines of the City of Dryden's environmental compliance approval. Projected volumes of non-solid hazardous waste are presented in Table 1 below.</p> <table border="1" data-bbox="989 992 1940 1430"> <thead> <tr> <th colspan="3" data-bbox="989 992 1940 1024">Table 1: Estimated Annual Solid Waste Quantities</th> </tr> <tr> <th data-bbox="989 1024 1178 1057">Project Phase</th> <th data-bbox="1178 1024 1598 1057">Year</th> <th data-bbox="1598 1024 1940 1057">Annual Waste Quantity (t)</th> </tr> </thead> <tbody> <tr> <td data-bbox="989 1057 1178 1179" rowspan="3">Construction</td> <td data-bbox="1178 1057 1598 1097">-2 (Site Prep)</td> <td data-bbox="1598 1057 1940 1097">240</td> </tr> <tr> <td data-bbox="1178 1097 1598 1138">-1 (Plant Construction)</td> <td data-bbox="1598 1097 1940 1138">500</td> </tr> <tr> <td data-bbox="1178 1138 1598 1179">Sub-Total</td> <td data-bbox="1598 1138 1940 1179">740</td> </tr> <tr> <td data-bbox="989 1179 1178 1349" rowspan="4">Operations</td> <td data-bbox="1178 1179 1598 1219">1-3 (Open Pit)</td> <td data-bbox="1598 1179 1940 1219">200</td> </tr> <tr> <td data-bbox="1178 1219 1598 1260">4-5 (Open Pit to U/G transition)</td> <td data-bbox="1598 1219 1940 1260">340</td> </tr> <tr> <td data-bbox="1178 1260 1598 1300">6-10 (U/G operation)</td> <td data-bbox="1598 1260 1940 1300">260</td> </tr> <tr> <td data-bbox="1178 1300 1598 1349">Sub-Total</td> <td data-bbox="1598 1300 1940 1349">2,580</td> </tr> <tr> <td data-bbox="989 1349 1178 1430" rowspan="2">Closure</td> <td data-bbox="1178 1349 1598 1390">11-12</td> <td data-bbox="1598 1349 1940 1390">100</td> </tr> <tr> <td data-bbox="1178 1390 1598 1430">Sub-Total</td> <td data-bbox="1598 1390 1940 1430">200</td> </tr> </tbody> </table>	Table 1: Estimated Annual Solid Waste Quantities			Project Phase	Year	Annual Waste Quantity (t)	Construction	-2 (Site Prep)	240	-1 (Plant Construction)	500	Sub-Total	740	Operations	1-3 (Open Pit)	200	4-5 (Open Pit to U/G transition)	340	6-10 (U/G operation)	260	Sub-Total	2,580	Closure	11-12	100	Sub-Total	200
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288	RG(1)-23	MOECC AC	EIS Summary Section 4.11	Section 5.6	<p data-bbox="989 683 1423 711">Summary of Comment / Rationale:</p> <p data-bbox="989 716 1913 808">Section 4.11 (EIS Summary) states: “The plant shall be supplied from the Hydro One 115 kV power line circuit M2D via one 138 kV 600 A motorized disconnect switch 270-DS-001 in series with one 1200 A, SF6 circuit breaker 270-CB-001.”</p> <p data-bbox="989 846 1944 906">Based on the size of the proposed transformer, it is unclear whether the Project will be subject to a Ministry of the Environment and Climate Change (MOECC) Class Environmental Assessment.</p> <p data-bbox="989 927 1402 954">Information Request / Comment:</p> <p data-bbox="989 959 1854 1019">A. Confirm whether or not the Project would be subject to a MOECC Class Environmental Assessment and provide the rationale.</p> <p data-bbox="989 1040 1129 1068">Response:</p> <p data-bbox="989 1073 1934 1235">A. Based on discussions with the Ministry of the Environment and Climate Change (MOECC), the current proposed design will be subject to the Minor Transmission Facilities (MTF) Class EA process and likely subject to the Class EA Screening. Treasury Metals will continue to engage MOECC and will begin the screening process as designated within the Guide to Environmental Assessment Requirements for Electricity Projects, January 2011.</p>			
289	RG(1)-24	MOECC	EIS Summary Section 6.2	Sections 9.1.2, 12.1.2	<p data-bbox="989 1252 1423 1279">Summary of Comment / Rationale:</p> <p data-bbox="989 1284 1934 1344">Section 6.2 (EIS Summary) indicates there are no anthropogenic sources of air emissions located proximal to the development.</p> <p data-bbox="989 1365 1402 1393">Information Request / Comment:</p> <p data-bbox="989 1398 1902 1458">A. Do not dismiss the potential impact that other emitters (such as Domtar Inc. in Dryden) may have on local air quality. No evidence to discount the impact from local sources, such as the</p>			

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					<p>Domtar Inc. Dryden mill, was provided. This may be considered for MOECC permits and approvals.</p> <p>Response: By “proximal” the text was referring to there being no sources within a kilometre of the site. There will be some regional influence from sources such as the Domtar facility. The effect of these types of sources is accounted for in the air quality assessment by adding a background concentration to the air modelling results. Additional information on cumulative effects of the Project, including air quality, is provided in Section 7.0 of the revised EIS.</p>
290	RG(1)-25	MOECC	EIS Section 13.1.4	Section 9.1.2	<p>Summary of Comment / Rationale: Laboratory analyses for various chemical parameters were not discussed in section 13.1.4 (EIS), some of which are required for a mine’s groundwater quality monitoring program under Ontario Regulation (O. Reg.) 240/00—Mine Development and Closure Under Part VII of the Act. The parameters in question include, but are not limited to, pH, conductivity, TSS, hardness, and ammonium. Complete details of the groundwater quality monitoring program will be required for the Provincial permitting phase.</p> <p>Information Request / Comment: A. Analyze the parameters referred to in the comments section of this IR and add them to the groundwater quality monitoring program.</p> <p>Response: The data referred to above has been provided in Appendix M to the revised EIS. The data are discussed in Section 5.6.1 and provided in full in Appendix F of Appendix M to the revised EIS.</p> <p>The Agency requested additional information and details for this response as part of the completeness check of the Round 1 responses. However, this question form part of Annex A2 of the Agency letter received on June 30, 2015. This letter stated that Annex A2: <i>“contains regulatory comments from government reviewers that must be addressed during the federal and provincial regulatory processes, as appropriate, but not necessarily during the EA process. Comments considered supplementary actions for consideration are also included in AnnexA2.”</i></p> <p>Additionally, the June 30, 2015 letter goes on to state the following: <i>“In accordance with s.23(2) of CEAA 2012, the Agency requests, at a minimum, that TMI submit complete responses to the requests and comments appearing in Annexes A1, A3 and A4. The timeline is stopped as of June 30, 2015 and will not recommence until the Agency completes the conformity review of the formal submission of responses to the IR-1 and is satisfied that robust responses to the comments and questions have been received.”</i></p>

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					<p>Based on the above excerpts, concerns with regards to the Annex A2 responses should not be the basis for delaying the technical review. If additional information or clarification regarding the Annex A2 responses is deemed desirable, it would be reasonable to include such requests as part of a second round of information requests following the technical review process.</p>
291	RG(1)-26	MOECC	EIS Section 13.1.2, Figures 13.1.1, 3.5.1, 3.5.2		<p>Summary of Comment / Rationale: The proponent will be required to comply with Guideline B-7 ("Incorporation of the Reasonable Use Concept into MOEE Groundwater Management Activities", dated April 1994, as amended) at all property boundaries.</p> <p>It is noted that the low grade ore (LGO) stockpile is located adjacent to a property boundary. This location may require detailed groundwater control measures and monitoring, the need for which should be identified in the EIS, and the specifics of which will be expected during Provincial permitting.</p> <p>The current groundwater monitoring locations are not likely to be sufficient, and a monitoring program that includes additional wells will be expected during provincial permitting. Specific areas where wells will be required include, but need not be limited to, the LGO area and east of Thunder Lake.</p> <p>Figures 3.5.1 and 3.5.2 (EIS, pages 3-14 and 3-15) show the property boundary immediately adjacent to the overburden stockpile, the waste rock stockpile, and the pit. It appears that the property boundary has been extended in these areas, but it cannot be confirmed.</p> <p>The Ministry of the Environment and Climate Change (MOECC) recommends [for the purpose of provincial regulatory requirements] that the monitoring network be finalized with the MOECC, the wells installed as soon as reasonably possible, the proposed groundwater level monitoring program initiated as soon as reasonably possible, and the proposed groundwater quality monitoring program initiated as soon as reasonably possible.</p> <p>The details of the groundwater monitoring program [as required by the MOECC] will be finalized during the provincial permitting phase; however, it is beneficial to have as much monitoring data as possible prior to the construction phase of the Project and monitoring should be initiated as proposed, with the inclusion of any modifications herein, as soon as reasonably possible.</p> <p>Information Request / Comment: A. Additional groundwater monitoring wells will be required in the groundwater monitoring network during the provincial permitting phase.</p>

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					<p>B. Compliance with Guideline B-7 is required at all property boundaries and there must be appropriate monitoring and contingency plans in place before any Environmental Compliance Approvals (ECAs) can be issued for these facilities.</p> <p>C. Confirm that the property boundary has been extended away from the main mine facilities and is not as depicted in Figures 3.5.1 and 3.5.2 of the EIS.</p> <p>Response: A. Groundwater monitoring wells have been installed by Treasury Metals and these are presently being monitored. New groundwater monitoring wells will be installed as part of the groundwater monitoring program, which is presented in Section 13.10.2 of the revised EIS. It is expected that the groundwater monitoring program will be agreed with the Ministry of the Environment and Climate Change (MOECC) prior to, or during, the Permit to Take Water application process for dewatering of the proposed mine workings of the Project.</p> <p>B. A Contingency Plan compliant with Guideline B-7 will be submitted to the MOECC for approval. It is expected that this plan will be submitted after agreement of the groundwater monitoring program with the MOECC. The Contingency Plan will be finalized when monitoring well specific baseline values have been determined following collection and analysis of at least one round of groundwater quality samples from the full approved groundwater monitoring network.</p> <p>C. Since the submission of the original EIS, Treasury Metals has been advancing their engineering for the Project. A summary of the refinements to the Project since the completion of the original EIS are presented in Section 3.16 of the revised EIS.</p>
292	RG(1)-27	MOECC	Appendix D Section 3.4		<p>Summary of Comment / Rationale: While it is known that the stormwater management plan will develop as the Project develops, additional, and more accurate, information will be required for permitting.</p> <p>Information Request / Comment: A. Keep in mind that when applying for provincial permits, more comprehensive information regarding stormwater management will be required.</p> <p>Response: This comment is noted. Treasury Metals will continue to work with the applicable provincial agencies to provide the required information to complete the provincial permitting process.</p>
293	RG(1)-28	MOECC	Appendix D Section 5.8		<p>Summary of Comment / Rationale: Section 5.8 (Appendix D) states: “it is recommended that the boreholes be constructed before commissioning the tailings storage facility to accumulate baseline data specific to the storage location.” The Ministry of the Environment and Climate Change concurs with this statement as this</p>

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					<p>baseline data will be important during the provincial permitting process and during the life of the mine.</p> <p>Information Request / Comment: A. It is recommended that boreholes/wells be constructed and groundwater monitoring commence as early as possible in the 2015 season.</p> <p>Response: Treasury Metals is currently working towards completing a drill program to establish said boreholes including boreholes at the proposed location of the tailings storage facility (TSF). Information collected from these boreholes will be used to further refine the engineering of the Project. Treasury Metals expects to have data from the boreholes starting in 2017.</p> <p>Groundwater monitoring wells have been installed by Treasury Metals and these wells are presently being monitored. New groundwater monitoring wells will be installed as part of the groundwater monitoring program, which is presented in Section 13.10.2 of the revised EIS (see also response to TMI_291-RG(1)-26).</p> <p>It is expected that the groundwater monitoring program will be agreed with the Ministry of the Environment and Climate Change (MOECC) prior to, or during, the Permit to Take Water application process for the dewatering of the proposed mine workings of the Project.</p>
294	RG(1)-29	MOECC	Appendix L	Section 9	<p>Summary of Comment / Rationale: There does not appear to be any modeling associated with Appendix L. Water quality assessment associated with geochemical modelling is an important step in helping to assess effects of the Project on the environment.</p> <p>The required information will also be necessary in full detail for the provincial permitting phase.</p> <p>Information Request / Comment: A. Provide details of the geochemical modelling conducted and how it relates to the water quality assessment.</p> <p>Response: A. Water Quality modelling for the pit lake was presented in the original EIS (Appendix C of Appendix F).</p> <p>Since the submission of the EIS, Treasury Metals has been advancing their engineering for the Project, including refining the water balance for the site. The refined water balance will modify some of the water predictions. To capture these changes and the changes suggested by the response to the Round 1 IRs, Treasury Metals has prepared a Water Report appended to the</p>

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					revised EIS as Appendix JJ (Appendix JJ to the revised EIS). Additional geochemical modelling is presented in Section 5 of Appendix JJ, while modelling of receiving water quality is presented in Section 6.
295	RG(1)-30	MOECC	Appendix M Section 5.3.3	Section 11	<p>Summary of Comment / Rationale: Since there are domestic use wells near the property boundaries of the Project, there are risks associated with the proposed dewatering of the mine workings.</p> <p>Information Request / Comment: A. During provincial permitting, it will be required that these risks be adequately mitigated and that adequate monitoring and contingencies be in place to protect the reasonable use of groundwater.</p> <p>Response: Treasury Metals acknowledges that a comprehensive set of mitigation measures for private wells will be incorporated into the approval application, required as part of the permitting process with the Ministry of the Environment and Climate Change (MOECC). Treasury Metals has also identified a comprehensive set of mitigation measures that it can implement. These mitigation measures are presented in Section 6.11.6 of the revised EIS.</p>
296	RG(1)-31	MOECC	Appendix F		<p>Summary of Comment / Rationale: The total fresh water requirement for the process plant is estimated to be 600 m³/day. Recycled effluent will account for approximately 450 m³/day, with the remaining 150 m³/day taken from the former tree nursery irrigation ponds. The former tree nursery ponds are situated on Thunder Lake Tributary 3. In order to meet the fresh water demand, the EIS states that 26% of the Thunder Lake Tributary 3 flow would be required. There is no discussion on the potential impacts of dewatering these ponds on either Thunder Lake Tributary 3 or associated wetlands.</p> <p>Information Request / Comment: A. Provide further information in relation to the potential environmental effects of water taking on the valued components. A more detailed assessment of hydrological changes and potential water taking impacts will be required by the Ministry of the Environment and Climate Change at the permitting phase of the Project. Monitoring and contingency plans will be required as part of a provincial Permit to Take Water, in conjunction with appropriate trigger mechanisms.</p> <p>Response: A. This comment is noted. Since the submission of the original EIS, Treasury Metals has been advancing their engineering for the Project, including refining the overall water taking activities,</p>

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					<p>and water balance for the site. This refinement will modify some of the water related predictions. To capture these changes, and to reflect changes suggested by the responses to the Round 1 IRs, Treasury Metals has prepared a Water Report (Appendix JJ to the revised EIS). An updated water balance, and surface water hydrology are captured within Section 2, and Section 4 of this report (Appendix JJ).</p> <p>The information related to hydrological effects and associated information is set out in Section 6.9 of the revised EIS.</p> <p>The Agency requested additional information and details for this response as part of the completeness check of the Round 1 responses. However, this question form part of Annex A2 of the Agency letter received on June 30, 2015. This letter stated that Annex A2:</p> <p><i>"contains regulatory comments from government reviewers that must be addressed during the federal and provincial regulatory processes, as appropriate, but not necessarily during the EA process. Comments considered supplementary actions for consideration are also included in AnnexA2."</i></p> <p>Additionally, the June 30, 2015 letter goes on to state the following:</p> <p><i>"In accordance with s.23(2) of CEAA 2012, the Agency requests, at a minimum, that TMI submit complete responses to the requests and comments appearing in Annexes A1, A3 and A4. The timeline is stopped as of June 30, 2015 and will not recommence until the Agency completes the conformity review of the formal submission of responses to the IR-1 and is satisfied that robust responses to the comments and questions have been received."</i></p> <p>Based on the above excerpts, concerns with regards to the Annex A2 responses should not be the basis for delaying the technical review. If additional information or clarification regarding the Annex A2 responses is deemed desirable, it would be reasonable to include such requests as part of a second round of information requests following the technical review process.</p>
297	RG(1)-32	MOECC	Appendix F		<p>Summary of Comment / Rationale:</p> <p>Although the proponent has committed to a collection system for their seepage, there will be a percentage of seepage that cannot be collected and will discharge to the watershed. Anticipated seepage water quality indicates that some contaminants of concern will exceed Provincial Water Quality Objectives (PWQO) in the seepage from some mine facilities.</p> <p>Because the small tributaries within the project area have no assimilative capacity, seepage will be required to meet very stringent criteria at the point of discharge to surface waters (i.e., PWQO or background concentrations). The proponent will need to provide expected receiver loading calculations. Updated source concentrations and calculated discharge loadings to surface water receivers will need to be incorporated into the assessment to evaluate the impact to surface waters.</p>

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					<p><u>Information Request / Comment:</u></p> <p>A. For provincial permitting, provide the following:</p> <ol style="list-style-type: none"> 1. Quantification of potential seepage 2. Predicted loadings of contaminants of concern from seepage 3. Assessment of potential impacts from discharge of seepage to surface water receivers <p>B. Discharge criteria and treatment options will be considered during the provincial permitting process and will reflect the assimilative capacity of the surface water receivers. A monitoring program will be defined in the provincial environmental compliance approval (ECA) for the site. A contingency plan will be required and the potential contingencies will be identified in the ECA, along with mitigation triggers.</p> <p>C. During operations, closure and post-closure, the Ministry of Northern Development and Mines and Ministry of the Environment and Climate Change (MOECC) will work together in the provincial closure plan and approvals processes. MOECC will identify additional requirements outside of the closure plan to address seepage, if necessary, which would be applied through an ECA (e.g., collection, treatment and discharge).</p> <p><u>Response:</u></p> <p>A. We appreciate your guidance. Treasury Metals has not yet entered into the formal permitting process with the Ministry of the Environment and Climate Change (MOECC). Additional information, as requested, will be provided to MOECC when Treasury Metals enters the formal permitting process. Estimates of seepage quantity and quality however, have been compiled and presented in Section 3 of the Water Report (Appendix JJ to the revised EIS). The potential loadings of seepage to groundwater is discussed in Section 3 of Appendix JJ, while the potential effects of seepage on surface water quality is provided in Section 6 of Appendix JJ. Additional information required to support the permitting process will be determined in discussions with regulators and made available during the permitting process.</p> <p>B. Thank you for your information, this is understood.</p> <p>C. Thank you for your information, this is understood.</p>
298	RG(1)-33	MOECC	Appendix F Section 3.2.1		<p><u>Summary of Comment / Rationale:</u></p> <p>Meeting MMER discharge limits for cyanide will not be adequate for discharge to the environment as site specific discharge limits will be determined in discussion with the Province. The natural attenuation and additional water treatment in the treatment plant may be necessary to achieve provincial permit effluent limits. Complete details of the TSF water budget and anticipated effluent concentrations to, and from, the TSF will be required for the provincial permitting phase.</p>

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response															
					<p>Information Request / Comment:</p> <p>A. Provide an estimate of the retention time of TSF water as it relates to natural attenuation of cyanide for the purposes of a contingency for the cyanide destruction circuit and ensuring compliance with Provincial permit effluent limit requirements.</p> <p>B. Provide complete details of the TSF water budget and anticipated effluent concentrations to, and from, the TSF.</p> <p>Response:</p> <p>A. An estimate of the retention time of the tailings storage facility (TSF) water has been completed in accordance with Ontario Regulation 560/94, "Effluent Monitoring and Effluent Limits – Metal Mining Sector. Operation of the TSF will consist of deposition of tailings solids resulting in variations in the tailings beach surface area over time. A water cover is planned for the TSF operations and the minimum required volume of water, to maintain the cover, will also vary during operation resulting from the variations in beach surface area. The retention time identified in the original EIS as 394 days, averaged over the life of the Project. Treasury Metals will continue to refine the engineering details for the Project as they proceed through the regulatory permitting process.</p> <p>As detailed within section 3.8.7 in the revised EIS, the process plant cyanide detoxification is intended to be designed to destroy the CIL tailings cyanide levels to < 1mg/L CN_{WAD}. This level will meet the current Metal Mining Effluent Regulations (MMER) limit for the maximum authorized monthly mean concentration. The preliminary detoxification circuit feed and discharge design cyanide levels are summarized in Table 1, below.</p> <table border="1" data-bbox="989 951 1940 1105"> <thead> <tr> <th colspan="3" data-bbox="989 951 1940 992">Table 1: Preliminary Cyanide Detoxification Circuit Design and Target Parameters</th> </tr> <tr> <th data-bbox="989 992 1444 1029">Parameter</th> <th data-bbox="1444 992 1692 1029">Unit</th> <th data-bbox="1692 992 1940 1029">Value</th> </tr> </thead> <tbody> <tr> <td data-bbox="989 1029 1444 1055">Feed Cyanide Concentration</td> <td data-bbox="1444 1029 1692 1055">CN_T (mg/L)</td> <td data-bbox="1692 1029 1940 1055">200</td> </tr> <tr> <td data-bbox="989 1055 1444 1081">Feed Cyanide WAD Concentration</td> <td data-bbox="1444 1055 1692 1081">CN_{WAD} (mg/L)</td> <td data-bbox="1692 1055 1940 1081">150</td> </tr> <tr> <td data-bbox="989 1081 1444 1105">Target Discharge Cyanide Concentration</td> <td data-bbox="1444 1081 1692 1105">CN_{WAD} (mg/L)</td> <td data-bbox="1692 1081 1940 1105">< 1</td> </tr> </tbody> </table> <p>In the unplanned or upset process event of the detoxification circuit being offline, CIL tailings could potentially be discharged to the TSF for short period of time at the feed concentrations nominated above while still meeting the MMER limits. While there may be times when the detoxification circuit may not reach 100% efficiency and discharge could occur in the range of 10-50 mg/L CN_{WAD}, Treasury Metals will strive to maintain an average target cyanide concentration within the TSF over the long-term basis.</p> <p>Future air/SO₂ cyanide detoxification test work will be completed during the next stage of plant feasibility study to confirm the plant CN_{WAD} discharge target of 1mg/L can be achieved and to confirm the detoxification circuit design parameters.</p>	Table 1: Preliminary Cyanide Detoxification Circuit Design and Target Parameters			Parameter	Unit	Value	Feed Cyanide Concentration	CN _T (mg/L)	200	Feed Cyanide WAD Concentration	CN _{WAD} (mg/L)	150	Target Discharge Cyanide Concentration	CN _{WAD} (mg/L)	< 1
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TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					<p>B. Since the submission of the EIS, Treasury Metals has been advancing the engineering and has refined the water management concept for the Project, included as Appendix F to the revised EIS. Treasury Metals will continue to refine the engineering details for the Project, including the water budgets, as they proceed through the regulatory permitting process has been updated with a new conceptual water balance, which incorporates refinements to the Project. Table 1 in Appendix F to the revised EIS depicts the conceptual water balance, including the quantity of water being pumped to and from the TSF.</p> <p>As described in Section 3.8 of the original and revised EIS, the operating strategy will be to minimize the need for effluent discharge from the TSF by segregating mine water in the minewater pond and runoff / seepage in the runoff collection ponds. In the event that there is surplus water in the TSF due to precipitation, the precipitation would dilute the cyanide concentration significantly. In the event of a water surplus in the TSF and a need for treatment and discharge, the following contingencies will be utilized to reduce cyanide concentrations.</p> <ul style="list-style-type: none"> • Hydrogen peroxide treatment to the TSF supernatant pond and/or incorporation into the reverse osmosis (“RO”) effluent treatment process, if RO treatment is insufficient. The treatment process and contingency treatments will be reviewed as part of the sewage Environmental Compliance Approval process with the Ministry of the Environment and Climate Change (MOECC). • Consolidation of the TSF surplus water with other surplus water at the site (i.e. runoff collection ponds, minewater pond) prior to RO treatment would reduce cyanide concentrations. <p>The conceptual water balance is provided in Appendix F to the revised EIS. As suggested in the water balance, the TSF has a negative water balance and there is a deficit due to the losses of water to tailings pore space and evaporation. During detailed design, the embankment will be raised adequately to ensure direct precipitation can be contained for design hydrologic conditions, effectively eliminating a surplus of water in the TSF. Given that there will normally be no need to treat and discharge water from the TSF, an updated and detailed evaluation of influent quality is not warranted. The operation from the TSF as a discrete pond is a precaution and adaptive management measure in case the TSF water is difficult to treat with a RO system.</p> <p>As part of the response to the Round 1 information requests, Treasury Metals has been required to submit a revised EIS for the Project. Table 3.8.8-1 of the revised EIS lists the expected quality of the process water released from the plant into the TSF. Table 3.8.9-1 of the revised EIS list the expected quality to be released from the effluent treatment plant into the environment. Treasury Metals have committed to treat the effluent from the Project to meet PWQO at the end of pipe.</p>
299	RG(1)-34	MOECC			Summary of Comment / Rationale:

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			Appendix F Section 11		<p>The expected pit lake and tailings storage facility (TSF) closure scenarios predict that concentrations of contaminants of concern (COCs) will exceed Provincial Water Quality Objectives (PWQO). The pit and TSF will both discharge passively to a tributary of Blackwater Creek.</p> <p>Because Blackwater Creek has no assimilative capacity, pit lake and TSF discharges will be required to meet very stringent discharge criteria at the point of discharge to the receiver (PWQO, CCME or background). In order to assess potential impacts to Blackwater Creek, an estimation of the contaminant loadings to the watershed and an assessment of potential long term impacts associated with these discharges are necessary.</p> <p>Information Request / Comment:</p> <p>A. Discharge criteria and treatment options will be considered during the provincial permitting process and will reflect the assimilative capacity of Blackwater Creek to receive discharge. The provincial environmental compliance approval (ECA) for the site will require a monitoring program and a contingency plan, which must include trigger criteria and feasible mitigation and remediation measures.</p> <p>B. During operations, closure and post-closure, the Ministry of Northern Development and Mines and Ministry of the Environment and Climate Change (MOECC) will work together in the provincial closure plan and approvals processes. MOECC will identify additional requirements outside of the closure plan to address pit and TSF discharge, if necessary, which would be applied through an ECA (e.g., collection, treatment and discharge).</p> <p>Response:</p> <p>A. This comment is noted. Treasury Metals will continue to work with the applicable provincial agencies to provide the necessary information throughout the provincial permitting process.</p> <p>B. This comment is noted.</p> <p>The Agency requested additional information and details for this response as part of the completeness check of the Round 1 responses. However, this question form part of Annex A2 of the Agency letter received on June 30, 2015. This letter stated that Annex A2:</p> <p><i>“contains regulatory comments from government reviewers that must be addressed during the federal and provincial regulatory processes, as appropriate, but not necessarily during the EA process. Comments considered supplementary actions for consideration are also included in AnnexA2.”</i></p> <p>Additionally, the June 30, 2015 letter goes on to state the following:</p> <p><i>“In accordance with s.23(2) of CEAA 2012, the Agency requests, at a minimum, that TMI submit complete responses to the requests and comments appearing in Annexes A1, A3 and A4.</i></p>

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					<p><i>The timeline is stopped as of June 30, 2015 and will not recommence until the Agency completes the conformity review of the formal submission of responses to the IR-1 and is satisfied that robust responses to the comments and questions have been received."</i></p> <p>Based on the above excerpts, concerns with regards to the Annex A2 responses should not be the basis for delaying the technical review. If additional information or clarification regarding the Annex A2 responses is deemed desirable, it would be reasonable to include such requests as part of a second round of information requests following the technical review process.</p>
300	RG(1)-35	MOECC	Appendix F Appendix N Appendix O		<p>Summary of Comment / Rationale: The site water balance is based on a conceptual model. Ongoing validation of this model will be required, both prior to provincial permitting and during mine operations, in order to confirm assumptions and/or update water balance predictions as necessary. As additional hydrology data becomes available, MOECC recommends that the Water Management Plan be reviewed and refined to reflect additional water balance information. This may include modifications or alterations of operational designs based on updated water balance modeling. Contingencies may be identified in the provincial permits, in conjunction with appropriate trigger mechanisms.</p> <p>Information Request / Comment: A. A more detailed assessment of hydrological changes will be required by the MOECC at the provincial permitting phase.</p> <p>In order to address uncertainty in hydrology modeling, further flow monitoring will be required during provincial permitting, construction and operations to verify predictions and to develop a robust hydrograph for the potentially impacted watersheds.</p> <p>Response: A. This comment is noted. Since the submission of the original EIS, Treasury Metals has been advancing their engineering for the Project, including refining the overall water taking activities and water balance for the site. This refinement will modify some of the water related predictions. To capture these changes, and to reflect changes suggested by the responses to the Round 1 IRs, Treasury Metals has prepared a Water Report (Appendix JJ to the revised EIS). An updated water balance, and surface water hydrology are captured within Section 2 and Section 4 of this report. The assessment of effects and impacts associated with the Project to surface water quality and quantity and the description of mitigation measures is provided in Sections 6.8 and 6.9 of the revised EIS. Treasury Metals is committed to working with the Ministry of the Environment and Climate Change (MOECC) throughout the permitting process to ensure all predictions and potential impacts are understood, and in turn mitigation measures put in place. As part of the provincial permitting process, these consultations will continue.</p>

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					<p>The Agency requested additional information and details for this response as part of the completeness check of the Round 1 responses. However, this question form part of Annex A2 of the Agency letter received on June 30, 2015. This letter stated that Annex A2:</p> <p><i>"contains regulatory comments from government reviewers that must be addressed during the federal and provincial regulatory processes, as appropriate, but not necessarily during the EA process. Comments considered supplementary actions for consideration are also included in AnnexA2."</i></p> <p>Additionally, the June 30, 2015 letter goes on to state the following:</p> <p><i>"In accordance with s.23(2) of CEAA 2012, the Agency requests, at a minimum, that TMI submit complete responses to the requests and comments appearing in Annexes A1, A3 and A4. The timeline is stopped as of June 30, 2015 and will not recommence until the Agency completes the conformity review of the formal submission of responses to the IR-1 and is satisfied that robust responses to the comments and questions have been received."</i></p> <p>Based on the above excerpts, concerns with regards to the Annex A2 responses should not be the basis for delaying the technical review. If additional information or clarification regarding the Annex A2 responses is deemed desirable, it would be reasonable to include such requests as part of a second round of information requests following the technical review process.</p>
301	RG(1)-36	MOECC	Appendix G Appendix N Appendix P Appendix Q Appendix S		<p>Summary of Comment / Rationale:</p> <p>Adequate baseline data will be required as part of the provincial permitting process. The purpose of baseline studies is to characterize the physical, chemical, and biological aspects of watersheds that may be potentially impacted by mining activities.</p> <p>The design of the baseline surface water monitoring program needs to include multi-year seasonal sampling to identify temporal variability associated with the collected data and to identify trends over time. Monitoring programs must be designed to statistically detect changes from baseline conditions.</p> <p>Surface water, sediment, benthic, fish community and fish tissue samples should be collected from all locations within the predicted zone of influence of the project including direct discharge locations, surface drainage locations, areas of water taking, and areas that may be influenced by groundwater seepage.</p> <p>The following needs to be considered when selecting sampling locations:</p> <ul style="list-style-type: none"> - adequacy to produce high quality samples that can be replicated; - effectiveness of the location to define baseline conditions; - use of the location for long term evaluation of potential effects of the project; and

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					<p>- development of a reference condition for the watershed to facilitate comparisons with non-impacted watersheds and to evaluate watershed changes.</p> <p>Information Request / Comment: A. Aquatic surveys will be a requirement of the provincial ECA and will include analysis of water and sediment chemistry, assessments of benthic macroinvertebrate and fish communities, and fish tissue analyses, in order to detect potential changes in the watershed.</p> <p>Response: All aquatic monitoring programs will be designed to statistically detect changes from baseline conditions and will be vetted with the Ministry of the Environment and Climate Change (MOECC) staff, as part of ECA application and the regulatory review process. All relevant analyzes will be considered as part of the assessments and will be confirmed with regulatory bodies prior to implementation. All reporting will adhere to regulatory requirements of the relevant provincial authorities.</p>
302	RG(1)-37	MOECC	Appendix H	Section 9.1.2	<p>Summary of Comment / Rationale: Section 3 – Noise Source Summary (Appendix H) states: “Details regarding types of equipment used during the operations phase were limited at the time of this assessment. Best-available data regarding noise sources for future construction, operations, and decommissioning were collected from Treasury Metals, and used to predict sound levels for the Project. The significant sources were identified from drawings and the project description provided to RWDI by Treasury.”</p> <p>Information Request / Comment: Provincial approvals issued under Section 9 of the Environmental Protection Act concerning noise emissions will not be granted without a complete and detailed listing and assessment of all stationary noise sources associated with this project, including the points of reception and impacts on noise-sensitive land uses (as defined in NPC-300). This may be considered for MOECC permits and approvals.</p> <p>Response: A complete assessment of noise was completed to support the revised EIS. All noise sources were modelled under the predictable worst-case scenario. The statement in Appendix H is meant to indicate that since specific equipment model numbers were not available, the sound levels used in the modelling are for typical models. Treasury Metals will ensure that the sound specifications of the final equipment selected is either matching or quieter than the levels outlined in the revised EIS.</p>
303	RG(1)-38	MOECC	Appendix H		<p>Summary of Comment / Rationale:</p>

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					<p>Section 3.3 - Identifiable Source Characteristics (Appendix H) states: "Sources that have characteristics considered to be particularly annoying receive additional consideration in accordance with NPC-104 guidelines (MOE, 1978). The adjustment is based on assessment at the point of reception, as described in Publication NPC-103. No sources were identified to exhibit annoying sound emissions."</p> <p>Publication NPC 104 Sound Level Adjustments describes when sound level adjustments to NPC-300/NPC-232 are required. The adjustments are required for any tonal, cyclical or quasi-steady impulsive sounds. The operations of fans, electrical motors, generators, drills, etc. at the site may generate these types of sounds and therefore warrant a sound level adjustment as described in NPC-104. This has not been considered in the noise assessment.</p> <p>Information Request / Comment: A. Sound characteristics described in Table 1: Noise Source Summary may need to be adjusted accordingly to account for sound level adjustments. This may be considered for MOECC permits and approvals.</p> <p>Response: A. Sound level adjustments were not included within the original EIS, as the sources in question at the Project do not typically exhibit the sound characteristics to warrant adjustments (i.e., ventilation equipment, generators, building exhausts, on site vehicle traffic and rock crushing equipment). Note that backup beepers, depending on the variety, are tonal but are exempt from evaluation since they are a safety device. Summaries of the noise sources for each respective phase are provided in Sections 6.2, 7.2 and 8.2 of the Environmental Noise Assessment (included as part of Appendix H-4 to the revised EIS).</p>
304	RG(1)-39	MOECC	Appendix H		<p>Summary of Comment / Rationale: Section 3 – Noise Source Summary (Appendix H) states: "Details regarding types of equipment used during the operations phase were limited at the time of this assessment. Best-available data regarding noise sources for future construction, operations, and decommissioning were collected from Treasury Metals, and used to predict sound levels for the Project. The significant sources were identified from drawings and the project description provided to RWDI by Treasury."</p> <p>Information Request / Comment: A. Provincial approvals issued under Section 9 of the Environmental Protection Act concerning noise emissions will not be granted without a complete and detailed listing and assessment of all stationary noise sources associated with this project, including their points of reception and</p>

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					<p>impacts on noise-sensitive land uses (as defined in NPC-300). This may be considered for MOECC permits and approvals.</p> <p>Response: A. A complete assessment of noise was completed to support the original EIS. All noise sources were modelled under the predictable worst-case scenario. The statement in Appendix H is meant to indicate that since specific equipment model numbers were not available, the sound levels used in the modelling are for typical models. Treasury Metals will ensure that the sound specifications of the final equipment selected is either matching or quieter than the levels outlined in the revised EIS.</p>
305	RG(1)-40	MOECC	Appendix H	Section 10.1.1	<p>Summary of Comment / Rationale: Appendix H indicates noise sources were assessed on the basis of the worst case scenario as required by Section A.4 of NPC-233 (Annex to Publication NPC-232). Section 1 (Appendix H) states: "This assessment focuses on sound levels due to the Project at surrounding worst-case sensitive receptors. Sources at the facility include: ventilation equipment, building exhausts, on site vehicle traffic, and rock crushing equipment."</p> <p>Information Request / Comment: A. The worst case scenario presented did not include any sound level adjustments that would have lowered the allowable limits at sensitive receptors. This may be considered for MOECC permits and approvals.</p> <p>Response: A. Sound level adjustments were not included within the original EIS, as the sources in question at the Project do not typically exhibit the sound characteristics to warrant adjustments (i.e., ventilation equipment, generators, building exhausts, on site vehicle traffic and rock crushing equipment). Note that backup beepers, depending on the variety, are tonal but are exempt from evaluation since they are a safety device. Summaries of the noise sources for each respective phase of the Project are provided in Sections 6.2, 7.2 and 8.2 of the Environmental Noise Assessment (included as part of Appendix H-4 to the revised EIS).</p>

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306	SD(1)-01	Sundry	EIS Sections 3, 5	Section 5	<p><u>Summary of Comment / Rationale:</u> Hydrogeological Pre-Feasibility/EA Support Study Goliath Project, AMEC Environment & Infrastructure, August, 2014 is referred to in the text frequently but not included (or if it is included not referenced) in the appendices.</p> <p><u>Information Request / Comment:</u> A. Include or provide reference to Pre-Feasibility/EA Support Study Goliath Project, AMEC Environment & Infrastructure, August 2014 in the appendices.</p> <p><u>Response:</u> The report entitled Hydrogeological Pre-Feasibility/EA Support Study Goliath Project is provided in Appendix M of the revised EIS.</p>
307	SD(1)-02	Sundry	EIS Sections 3, 5, 5.10.3, 5.10.3.1, Table 1.10.1 Appendix S Section 3	Section 5, 9	<p><u>Summary of Comment / Rationale:</u> There are a number of inconsistencies between sections of the EIS document/appendices. Some of these include:</p> <ul style="list-style-type: none"> • No Plant species at risk (SAR) were identified in the project description presented in Chapter 3 (EIS). The proponent then goes on to identify Marsh Marigold in Section 5.10.3 (EIS). • There are inconsistencies between the plant species listed on Tables 5.10.1 (EIS) and section 3.1 (Appendix S). Marsh marigold, the only identified plant SAR in the local study area, was not included in the wetland baseline study (Appendix S). Yellow birch (<i>Betula alleghaniensis</i>), bur oak (<i>Quercus macrocarpa</i>) and white elm (<i>Ulmus laevis</i>) were included in Table 5.10.1 (EIS) but not Table 3.1 (Appendix S). Beach-Heather (<i>Hudsonia tomentosa</i>) was included in Appendix S but not the EIS. • Section 5.10.3.1 (EIS) refers to wild rice, which is not a SAR. <p><u>Information Request / Comment:</u> A. Revise sections referenced in the comments section of this IR to correct for inconsistencies between EIS sections and appendices. B. Explain why some plant SAR were discussed in the EIS but not included in the study presented in appendix S and vice versa. C. Remove wild rice from SAR discussion(s) in the EIS.</p> <p><u>Response:</u> A. Section 3 of the revised EIS provides a description of the main Project features. It would not be expected to incorporate a discussion of baseline ecological conditions, including Species at Risk (SAR). A description of the baseline ecological conditions was presented in Section 5 of the revised EIS. Section 5.9.2 discusses vegetation, Section 5.9.3 wetlands and 5.11 SAR.</p>

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					<p>B. Appendix S is a summary of the wetland evaluations completed in 2013, whereas the plant SAR discussed in the EIS are a result of vegetation surveys completed in 2011 as well as the wetland evaluations from 2013. Some of plants mentioned in the EIS were not observed in wetlands during the 2013 evaluations and therefore would not appear in the wetland report provided as Appendix S to the EIS. Also, to clarify the above comment regarding Table 5.10.1 of the original EIS: Table 5.10.1, makes a reference to FLOATING Marsh Marigold (<i>Caltha natans</i>), which is a SAR. This plant was observed during the vegetation surveys in 2011. The wetland report provided as Appendix S to the EIS makes reference to Marsh Marigold (<i>Caltha palustris</i>), which is NOT a SAR. The Wetlands Baseline Report (2016), which was appended to the revised EIS as Appendix S clarifies the difference between these plants the 2011/2013 vegetation surveys, and includes Beach-Heather to the list of plant SAR observed.</p> <p>C. Noted.</p>
308	SD(1)-03	Sundry	EIS Sections 3, 6, 13 Appendix H	Section 9	<p>Summary of Comment / Rationale: NPC-300 has replaced NPC-232. The proponent refers to both documents intermittently throughout the EIS and appendices.</p> <p>Information Request / Comment: A. Revise the EIS and appendices to refer to the most recent guidelines.</p> <p>Response: The NPC 232 document was only referenced within the Noise Baseline Study (included in Appendix H-2 to the EIS), and the baseline noise sections of the revised EIS (Section 5.3). At the time of the baseline study (August 2013) NPC 232 was the applicable noise guideline. The specific aspects of NPC 232 that were referenced in the Noise Baseline Report (i.e., guideline limits) still apply without modification under NPC 300.</p>
309	SD(1)-04	Sundry	EIS Section 5.8.1, Table 5.8.1	Section 9.1.2	<p>Summary of Comment / Rationale: Note 1 and the explanation for the asterisk and double asterisks are missing in this table. Furthermore, the table only shows 8 locations added during the 2012/2013 sampling program but Section 5.8.1 (EIS) indicated that there were nine locations.</p> <p>Information Request / Comment: A. Provide Note 1 and the explanations for the asterisks in Table 5.8.1. Clarify whether there were 8 or 9 locations added during the 2012/2013 sampling program.</p> <p>Response: The asterisks listed in Table 5.8.1 were originally used to help the reader identify the sources of the monitoring data presented, As the text regarding the sources of presented monitoring was provided in the EIS, the note were largely redundant. The following provided the mission information.</p>

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					<p>Notes * Station initiated in June 1997 were part of the NAR Environmental Assessment (1997) and were reinitiated by KCB in 2010 ** Sample year 2010 – 2011 from KCB (2012), sample year 2014 (DST Consulting). *** Schedule provided in KCB (2012)</p>
310	SD(1)-05	Sundry	EIS Section 5.9.4	Section 9.1.2	<p>Summary of Comment / Rationale: The bats that were detected include little brown bat, and northern long-eared bat, which are both endangered species under the Species at Risk in Ontario list.</p> <p>Information Request / Comment: A. This classification should be corrected.</p> <p>Response: Classification of species at risk can be referenced as part of revised EIS Section 5.11.2 and Table 5.11.2 (see the response to TMI_316-SD(1)-11). Both species of bat have been listed as endangered species in Table 5.11.2 of the revised EIS.</p>
311	SD(1)-06	Sundry	EIS Table 5.9.5	Section 9.1.2	<p>Summary of Comment / Rationale: In Table 5.9.5 (EIS, page 5-95) the “Provincially Significant” species are actually provincial species at risk (special concern) under the Species at Risk in Ontario list.</p> <p>Information Request / Comment: A. This classification should be corrected.</p> <p>Response: Noted. The title for Table 5.9.5 of the original EIS should have read “Provincial Species at Risk Identified During the Wetland Survey” (see also the response to TMI_312-SD(1)-07). The table is provided as Table 5.9.3.3-2 “Species at Risk Encountered During Wetland Surveys” of the revised EIS.</p>
312	SD(1)-07	Sundry	EIS Table 5.9.5	Section 9.1.2	<p>Summary of Comment / Rationale: In Table 5.9.5 (EIS, page 5-95) the “Provincially Significant” species are actually provincial species at risk (special concern) under the Species at Risk in Ontario list.</p> <p>Information Request / Comment: A. This classification should be corrected.</p> <p>Response:</p>

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					This request is a duplicate of TMI_311-SD(1)-06. Please see the response to TMI_311-SD(1)-06.
313	SD(1)-08	Sundry	EIS Section 5.9.5	Section 9.1.2	<p><u>Summary of Comment / Rationale:</u> The barn swallow is listed as having active nests on buildings on the grounds of the former tree nursery. It should be noted that barn swallows are listed as threatened under the Species at Risk in Ontario list.</p> <p><u>Information Request / Comment:</u> A. This classification should be corrected.</p> <p><u>Response:</u> Noted. Please refer also to the response TMI_316-SD(1)-11.</p>
314	SD(1)-09	Sundry	EIS Section 6.2.1.12	Section 5.6	<p><u>Summary of Comment / Rationale:</u> Section 6.2.1.12 states that “Makeup water may be required for operation of the processing plant and may be obtained from groundwater wells or via pipeline from the old tree nursery irrigation ponds located on the Hoffstrom’s Bay Tributary on the Treasury offices site which has potential to reduce water quantity and, indirectly, habitat quality”.</p> <p><u>Information Request / Comment:</u> A. Confirm that the tree nursery ponds are located on the Thunder Lake Tributary 2.</p> <p><u>Response:</u> There are 3 irrigation ponds located at the former Ministry of Natural Resources and Forestry (MNR) tree nursery. One of the irrigation ponds is located on Thunder Lake Tributary 2 (north of the Project Office). The other 2 ponds are located on Thunder Lake Tributary 3, on either side of Tree Nursery Road.</p>
315	SD(1)-10	Sundry	EIS Section 5.11, Table 5.11.1	Section 9.1.3	<p><u>Summary of Comment / Rationale:</u> Thunder Bay has 2 post-secondary institutions that are not included in Table 5.11.1.</p> <p><u>Information Request / Comment:</u> A. Consider including Lakehead University and Confederation College to the table.</p> <p><u>Response:</u> Noted. Table 5.12.2.2-1 “Education Facilities in the Study Area” of the revised EIS has been updated to reflect the presence of those post-secondary institutions.</p>

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
316	SD(1)-11	Sundry	EIS Table 5.10.2	Section 9.1.2	<p>Summary of Comment / Rationale: There are several errors in Table 5.10.2 (EIS, pages 5-103 and 5-104). For example, under SARO, common nighthawk should be listed as special concern, barn swallow is threatened, and Canada warbler is special concern.</p> <p>Information Request / Comment: A. It is recommended that these errors are corrected and that all species in the table are checked for accurate representation of how they are listed under SARA, COSEWIC, and SARO.</p> <p>Response: Noted. Please refer to TMI_361-SD(1)-11_Table_1 for an updated listing:</p>
317	SD(1)-12	Sundry	EIS Section 12.4.2 Executive Summary 12.4.2.12	Section 4	<p>Summary of Comment / Rationale: The EIS states that fish habitat compensation or habitat compensation will be provided as per the Fisheries Act authorization requirements. To be clear, the Fisheries Act amended in 2013 refers to habitat compensation now as offsetting. The Metal Mining Effluent Regulations were not amended and the compensation plan is referred to still as that. Though seemingly unimportant it can be confusing when the language is altered in other sections of the document.</p> <p>Information Request / Comment: A. No question.</p> <p>Response: Noted. Future reference will use the updated language.</p>
318	SD(1)-13	Sundry	Appendix AA Section 1.2.3	Section 5.1	<p>Summary of Comment / Rationale: Section 1.2.3 Land Ownership indicates "a detailed summary of present claims and patents can be found in Appendix AA" however Appendix AA only provides a Claim list but no list of Patent properties. Appendix AA should also include list of Lease properties.</p> <p>Information Request / Comment: A. Add the list of Patent and Lease properties to Appendix AA.</p> <p>Response: An updated listing of land tenure, including leased lands is provided in Appendix AA to th revised EIS.</p>
319	SD(1)-14	Sundry		Section 5.7	<p>Summary of Comment / Rationale:</p>

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			Appendix E Section 4.1, Figure 4		<p>Information in this section in the referenced figure is dated. The illustration is of the original mine site plan and does not include the new preferred processing plan location.</p> <p>Information Request / Comment: A. Replace the out of date figure with one that includes the preferred layout and orientation for the latest processing plan.</p> <p>Response: The changes to the Project footprint and plant layout since the completion of the traffic study (Appendix E to the revised EIS) do not change the data or conclusions presented within Appendix E. Since the submission of the original EIS, Treasury Metals has been advancing their engineering for the Project. A summary of the refinements to the Project since the completion of the original EIS is presented Section 3.16 of the revised EIS. An updated site location figure with up-to-date road networks is presented as Figure 3.0-1A in Section 3.1 of the revised EIS. The Agency requested additional information and details for this response as part of the completeness check of the Round 1 responses. However, this question form part of Annex A2 of the Agency letter received on June 30, 2015. This letter stated that Annex A2: <i>“contains regulatory comments from government reviewers that must be addressed during the federal and provincial regulatory processes, as appropriate, but not necessarily during the EA process. Comments considered supplementary actions for consideration are also included in AnnexA2.”</i> Additionally, the June 30, 2015 letter goes on to state the following: <i>“In accordance with s.23(2) of CEAA 2012, the Agency requests, at a minimum, that TMI submit complete responses to the requests and comments appearing in Annexes A1, A3 and A4. The timeline is stopped as of June 30, 2015 and will not recommence until the Agency completes the conformity review of the formal submission of responses to the IR-1 and is satisfied that robust responses to the comments and questions have been received.”</i> Based on the above excerpts, concerns with regards to the Annex A2 responses should not be the basis for delaying the technical review. If additional information or clarification regarding the Annex A2 responses is deemed desirable, it would be reasonable to include such requests as part of a second round of information requests following the technical review process.</p>
320	SD(1)-15	Sundry	Appendix EE Section 5.2.3	Section 10.2	<p>Summary of Comment / Rationale: “Regionally hunting and trapping can continue as per the limits imposed by the OMNRF. Current numbers for active hunters within the region are detailed in Table 5.5 and Table 5.6.”</p> <p>Inaccuracy – OMNRF does not set limits for subsistence (Aboriginal treaty right country food) harvest. Table 5.5 and 5.6 includes information for the recreational hunt but subsistence hunting</p>

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					<p>numbers could be quite different. The section on hunting and trapping is technical, could there be a reference to the appendix where the human health assessment is covered?</p> <p>Information Request / Comment: A. Revise wording.</p> <p>Response: A. Noted. Treasury Metals has prepared a revised EIS that explicitly distinguishes between recreational hunters, commercial trappers and traditional uses of the land by Aboriginal peoples. Recreational hunting and commercial trapping are addressed as part of the land use component in Section 6.16 of the revised EIS. Aboriginal uses of the land for traditional purposes are addressed in the Aboriginal people component in Section 6.21 of the revised EIS. Additionally, the consumption of country foods by Aboriginal people and non-Aboriginals are addressed under the human health component in Section 6.19 and Appendix EE to the revised EIS.</p>
321	SD(1)-16	Sundry	Appendix EE Section 6	Section 9.1.3	<p>Summary of Comment / Rationale: The Tetra Tech human health assessment is referenced several times throughout Appendix EE but it is not listed in the references. It is unclear where that assessment/report is housed.</p> <p>Information Request / Comment: A. Include a clear reference to this document.</p> <p>Response: The Tetra Tech report referenced in Appendix EE is submitted as Appendix W to the revised EIS. Appendix W is entitled– Screening Level Risk Assessment for the Goliath Mine Site. Appendix W was prepared by Tetra Tech in February 2015.</p>
322	SD(1)-17	Sundry	Appendix H Section 4.2.1	Section 10	<p>Summary of Comment / Rationale: Section 4.2.1 (Appendix H) refers to the “Guidance for Evaluating Human Health Impacts in Environmental Assessment: Noise (HC, 2011)”. This DRAFT document is not supported by Health Canada (HC) and should not be cited. For current HC guidance on noise, refer to the “Useful Information for Environmental Assessments” publication: http://www.hc-sc.gc.ca/ewh-semt/pubs/eval/environ_assess-eval/index-eng.php Further, section 4.2.1.1 (Appendix H) states the noise sensitive receptor locations are identified using the Ministry of Environment and Climate Change (MOECC) definition of noise sensitive receptor and the locations for both the MOECC assessment and the HC assessment are the</p>

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					<p>same. Given the DRAFT HC 2011 document is not supported by HC, it is appropriate to revise this section.</p> <p>Information Request / Comment:</p> <p>A. Revise Section 4.2.1 to reflect the appropriate guidance on noise. B. Revise the statement in question and provide a reference for the appropriate MOECC document discussing receptor locations. C. Include the definition used by MOECC to determine noise sensitive receptor locations in the EIS.</p> <p>Response:</p> <p>A. Appropriate guidance was used in the EIS/ECA. Although not a supported document, the Health Canada 2011 draft document “Guidance for Evaluating Human Health Impacts in Environmental Assessment: Noise” is consistent with the “Useful Information for Environmental Assessments” document and provides further details on the assessment process. All technical information in the EIS that referenced the draft guidance is still consistent with the Useful Information for Environmental Assessments document and no updates to the original EIS and report are required.</p> <p>B and C. The definition of “Point of Reception”, as included in NPC-300 (part A), generally refers to “any location on a noise sensitive land use where noise from a stationary source is received”. “Noise sensitive land uses” are generally defined as property accommodating a dwelling, noise sensitive commercial building, or noise sensitive institutional purpose building”. Further definitions of these terms provide some restriction around what types of uses may be considered to be sensitive. The full definitions are lengthy and can be found in NPC 300 (MOE, 2014). A fulsome description of the Ministry of the Environment and Climate Change (MOECC) guidance for identifying sensitive receptors has been included in Section 6.1.4.4 of the revised EIS.</p>
323	SD(1)-18	Sundry	Appendix H Section 4.2.1	Section 10	<p>Summary of Comment / Rationale:</p> <p>Section 4.2.1 (Appendix H) refers to the “Guidance for Evaluating Human Health Impacts in Environmental Assessment: Noise (HC, 2011)”. This DRAFT document is not supported by Health Canada (HC) and should not be cited.</p> <p>For current HC guidance on noise, refer to the “Useful Information for Environmental Assessments” publication: http://www.hc-sc.gc.ca/ewh-semt/pubs/eval/environ_assess-eval/index-eng.php</p> <p>Further, section 4.2.1.1 (Appendix H) states the noise sensitive receptor locations are identified using the Ministry of Environment and Climate Change (MOECC) definition of noise sensitive receptor and the locations for both the MOECC assessment and the HC assessment are the</p>

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					<p>same. Given the DRAFT HC 2011 document is not supported by HC, it is appropriate to revise this section.</p> <p>Information Request / Comment:</p> <p>A. Revise Section 4.2.1 to reflect the appropriate guidance on noise.</p> <p>B. Revise the statement in question and provide a reference for the appropriate MOECC document discussing receptor locations.</p> <p>C. Include the definition used by MOECC to determine noise sensitive receptor locations in the EIS.</p> <p>Response:</p> <p>This request is a duplicate of TMI_322-SD(1)-17. Please see the response to TMI_322-SD(1)-17.</p>
324	SD(1)-19	Sundry	Appendix H Section 9	Section 10	<p>Summary of Comment / Rationale:</p> <p>The general statement of “a 3 dBA increase or decrease would be considered imperceptible to humans” is misleading. Humans may perceive and respond to changes in sound characteristics other than loudness (magnitude). Examples of these include frequency, sound modulation, impulsiveness and tonality.</p> <p>Information Request / Comment:</p> <p>A. Remove the statement regarding perception of sound as it is misleading.</p> <p>Response:</p> <p>The statement was made in respect to an increase in sound level without a change in source character. While it is true that an increase in sound level that’s also accompanied by a significant change in frequency may be more easily noticed, that is not the sort of increase referenced by this statement.</p>
325	SD(1)-20	Sundry	Appendix W Table 3	Section 10.1.3	<p>Summary of Comment / Rationale:</p> <p>“MOE POI limits” of 50 µg/m³ for PM₁₀ and 27 µg/m³ for PM_{2.5} are provided in Table 3. Note that the PM₁₀ standard is in fact an interim AAQC (MOE 2012b) and the PM_{2.5} is a CAAQS (CCME 2012) - they are not MOE POI limits.</p> <p>Information Request / Comment:</p> <p>A. Provide correct references for the PM₁₀ and PM_{2.5} air screening criteria.</p> <p>Response:</p> <p>The use of the term “POI limits” was meant to be inclusive of ambient air quality criteria and Canada-wide Standards endorsed by the province of Ontario.</p>

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326	SD(1)-21	Sundry	Appendix W Table 3	Section 10.1.3	<p><u>Summary of Comment / Rationale:</u> Several analytes had no screening criteria identified (e.g., gold, bismuth, gallium, etc.) and were not retained in the HHRA with the following rationale provided: “No guideline, do not retain”. While these specific substances would not normally be expected to be toxic when present at very low levels (based on low relative toxicity), the lack of guideline(s) is an inadequate rationale for their exclusion.</p> <p><u>Information Request / Comment:</u> A. Expand the rationale for the substances without guidelines to further justify excluding them.</p> <p><u>Revised Response:</u> Table 3 of the SLRA (Appendix W to the revised EIS) is entitled “COC Selection — Dust Deposition — Baseline and Operations”, and identifies the following compounds as having “no guideline, do not retain”:</p> <ul style="list-style-type: none"> • Gold; • Bismuth; • Gallium; • Lanthanum; • Scandium; and • Thorium. <p>As stated in Section 6.19.2.1 (Problem Formulation and Conceptual Site Model, Contaminant of Concern Selection), regulatory agencies provide screening criteria including the CCME and MOECC provide health based screening criteria for chemicals who are known to pose potential human health risks via peer reviewed toxicity information. For chemicals that do not have health based screening criteria (for example gold, bismuth, gallium, lanthanum, scandium, and thorium) it is assumed that based on risk assessment science, at this time there is insufficient toxicity information available to suggest human health risks would occur, and as such no potential human health risk are anticipated. No further assessment of these chemicals is required at this time. In the event new toxicity information emerges, a revised contaminant screening and COC selection would occur as part of a follow-up program (as discussed in Section 13 of the revised EIS).</p>
327	SD(1)-22	Sundry	Appendix W Section 4.4.2	Section 10.1.3	<p><u>Summary of Comment / Rationale:</u> The toxicological reference values (TRVs) provided for mercury and lead in Table M (“Human Health COC and Key Toxicological Effects”) are indicated to be in units of “µg/kg-bw/day”. However, the values provided in fact appear to be in mg/kg-bw/day.</p>

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					<p>Information Request / Comment: A. Correct the units for the lead and mercury TRVs in Table M and in risk calculations.</p> <p>Response: The values listed are in units of mg/kg-bw/d and are carried through the calculations as such. Therefore, the risk calculations and conclusions are unaltered.</p>
328	SD(1)-23	Sundry	Appendix W Table 5	Section 10.1.3	<p>Summary of Comment / Rationale: A CDWQG of 10 µg/L was provided for selenium, based on Health Canada (2012a). Note that the CDWQG for selenium was updated in 2014, and is now 50 µg/L (Health Canada 2014).</p> <p>Information Request / Comment: A. Update the selenium CDWQG to the current value.</p> <p>Response: The update to the CDWQG for selenium is noted. The change, however, does not alter the conclusions of the SLRA.</p>
329	SD(1)-24	Sundry	Appendix W Sections 6.4, 7.1	Section 10.1.3	<p>Summary of Comment / Rationale: Section 6.4 indicates that human health risk estimates were only generated for dust exposures from soil, and not for ingestion of food such as fish and wild game. Section 7.1 indicates that only dust exposures were quantitatively considered for the HHRA (Operational phase) and no risk estimates were generated for the Post-Closure phase. However, risk estimates for country food for lead and mercury (for both phases of the project) were presented in section 4.5.8 "Risk Estimate Results". These differences create uncertainties in how the exposure routes were actually incorporated into the country foods risk estimates.</p> <p>Information Request / Comment: A. Update sections 6.4 and 7.1 to reflect that risk estimates were generated for the country foods assessment (including the post-closure phase).</p> <p>Response: The assessment of exposure via country foods was a late addition to the risk assessment. This was not reflected in Sections 6.4 and 7.1 of the original EIS. A revised evaluation of the potential effects of the Project and associated information on human health has been presented in Sections 6.19 and 8.20 of the revised EIS.</p>