

Magino Gold Project

Finan Township, Algoma District, Ontario

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN:

SECTION 2: ACCIDENT AND MALFUNCTION RESPONSE PLAN

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EMP/OPERATIONAL STANDARD REVISION RECORD

EMP Name	Revision	Revision Date	Summary of Revision
	Number		
Accident and Malfunction	V1	October 30, 2020	N/A
Response Plan			
Accident and Malfunction	V2	November 13, 2020	Consistency Check
Response Plan			
Accident and Malfunction	V3	January 15, 2020	Consistency Check,
Response Plan			addressed relevant
			authority comments
Accident and Malfunction	V4	February 26, 2020	Added further reportable
Response Plan			spill information

LIST OF ACRONYMS

CEMP	Construction Environmental Management Plan
EA	Environmental Assessment
ECA	Environmental Compliance Approval
EIS	Environmental Impact Statement
EMP	Environmental Management Plan
IAAC	Impact Assessment of Canada
MECP	Ministry of Environment Conservation and Parks (Ontario)
MSDS	Material Safety Data Sheet
SAC	Spills Action Centre
TMF	Tailings Management Facility
TSS	total suspended solids

2.1. INTRODUCTION

2.1.1. Purpose and Objectives

This Accident and Malfunction Response Plan (the Plan) is one of the Environmental Management Plans (EMPs) that Prodigy Gold ('Prodigy') has developed for the Magino Gold Project ('the Project'), as per the Environmental Impact Statement (EIS) Commitments (posted to the Impact Assessment Agency of Canada's (IAAC) Registry in December 2018¹), as well as the Environmental Assessment (EA) conditions issued to Prodigy by the federal Minister of the Environment on January 24, 2019 in the Decision Statement². These EMPs form part of the *Construction Environmental Management Plan* (CEMP). EA conditions and EIS Commitments related to accident and malfunction responses are found in Appendix 2-C (Table 2-C-1 and Table 2-C-2). This Plan has been developed in accordance with Prodigy's EIS Commitments (30, 52, 87, 112, 118, 135) and EA conditions (8.1, 8.3-8.5). The development of this Plan is in fulfillment of EA condition 8.3 and EIS Commitments (118, 135).

Prodigy is committed to protecting the environment, safe operations, and the health and safety of our employees, contractors, and the communities in which we operate. The purpose of this Plan is to document the processes to be implemented at the Project site (site) to ensure that the safety of operations including infrastructure and services, environmental protection, and the health and safety of all peoples are protected and managed in accordance with regulatory and Project requirements for construction of the Project.

Role	Responsibility (See Section 2.3 Procedures for Details)
Role Environmental Manager	 Responsibility (See Section 2.3 Procedures for Details) Issue directive to alter or suspend work activities if needed to ensure environmental protection; Responsible for communications to senior mine management and coordinating communications with Indigenous communities and potentially affected members of the public; Responsible for ensuring required reporting has been completed and submitted to regulatory authorities; Responsible for directing all aspects of Prodigy's environmental programs for the Project and reports to the Mine Manager; Responsible for ensuring appropriate site personnel (contractors and etaff) are submit of the CEMP and follow the guidance centained.
	herein;

2.1.2. Roles and Responsibilities

¹ Prodigy Gold Inc. December 2018. *Magino Project Commitments List*. <u>https://iaac-aeic.gc.ca/050/documents/p80044/125783E.pdf</u>

² Canadian Environmental Assessment Agency. January 2019. *Decision Statement Issued Under Section 54 of the Canadian Environmental Assessment Act, 2012 for the Magino Gold Project*. <u>https://iaac-aeic.gc.ca/050/documents/p80044/126612E.pdf</u>

Role	Responsibility (See Section 2.3 Procedures for Details)
	 Responsible for implementation of best management practices for the CEMP;
	 Responsible for ensuring that staff are familiar with the applicable regulatory and other requirements as outlined in this Plan and other sections of the CEMP with relevance to this Plan:
	 Provide interpretation or guidance in the event of uncertainty around permit requirements or other actions which may have the potential for environmental harm; and
	 Maintaining records relevant to the implementation of the conditions in the federal Decision Statement.
Environmental Monitoring Team	 Use a plan-do-check-act approach to meeting the requirements of regulatory instruments and applicable law; and Implement a risk-based approach that will dictate monitoring requirements and frequency.
Construction Mine Manager	 Responsible for ensuring all contractors and construction staff are aware of the requirements in the CEMP;
	 Responsible for ensuring all contractors and construction staff are aware of and following best practices when handling materials or when conducting work on-site;
	 Responsible for ensuring all contractors and construction staff are aware of and following best practices when working in or near waterbodies;
	 Responsible for coordinating communications with Prodigy senior management;
	 Responsible for ensuring that all staff are familiar with Environmental Compliance Approval (ECA) and appropriate permitting;
	 Responsible for coordinating with all contractors for delivery of materials to the work site;
	 Responsible for notification prior to any blast events, and notification of the all-clear after blast events;
	 Responsible for ensuring the blast zone is appropriately cordoned off prior to blast events, and removal of any access barriers after the all- clear is given; and
	 Responsible for ensuring proper signage posted around excavation sites.
Site Security	 Follow best practices and appropriate guidance in this document; Coordinating the regular inspections of the security gate and other security features;

Role	Responsibility (See Section 2.3 Procedures for Details)					
	Using the Site Security Monitoring Form (and any revised versions					
	thereof) to keep a log of the site security monitoring;					
	• Report to the Environmental Manager any damage to the security gate					
	or other implemented security features or any observed security					
	breaches;					
	• In the even that a major site security breach occurs, the security					
	monitor is responsible for reporting immediately to the Environmental					
	Manager and relevant authorities;					
	Responsible for receiving any incoming notification or report of an					
	accident or malfunction and relaying to the Mine Manager,					
	Environmental Manager, or Construction Manager; and					
	• Responsible for securing the area of the accident or malfunction and					
	preventing access in order to avoid subsequent harm or damage.					
All employees/	• Follow best practices and appropriate guidance in this document;					
contractors	• Responsible for following direction of Environmental Manager and/or					
	the Construction Manager as indicated in this Plan; and					
	Responsible for ensuring they are familiar with the applicable					
	regulatory and other requirements as outlined in this Plan and other					
	sections of the CEMP with relevance to this Plan.					
Indigenous	Indigenous communities are to be notified as soon as possible of in					
communities	instances of an accident or malfunction; this Plan provides details on					
	the types of accidents and malfunctions requiring notification of					
	Indigenous communities; and					
	• Participate in providing input and direction as identified throughout the					
	process of the Project.					

2.1.3. Related Documents

This Accident and Malfunction Response Plan has linkages to other Plans that take into consideration aspects related to these activities. In particular the following CEMP sections have some relation to accidents and malfunctions:

- Appendix 2.3: Indigenous Communities Master Contact List provides key contact information to be used for notification of Indigenous communities in the event of an accident or malfunction with the potential to cause adverse environmental effects (see Section 2.7.2 of this Accident and Malfunction Plan of the Communication Plan). Includes both elected leadership, key staff, and their technical experts/consultants; it is updated periodically as necessary;
- 7.1: Indigenous Engagement Plan which, among other objectives, provides additional information on the Indigenous communities that are to be notified, and on engagement more generally; and

• 8: Site Security, Roads and Traffic Management Plan – provides detail regarding site access and security which may be employed in the event of an accident or malfunction on the site.

2.2. CONCERN

As with any construction site and industrial operation, during the construction and operations phases of the Project there exists the potential for accidents and malfunctions of equipment and structures which could result in adverse environmental and safety effects. The potential hazards include, but are not limited to:

- 1. Fire
- 2. Uncontrolled release of process water, chemicals or other materials (spill)
- 3. Explosion or uncontrolled detonation
- 4. Vehicle/equipment collision or upset
- 5. Failure of hydraulic structure

Control measures are available that when appropriately planned and implemented, effectively mitigate the risks arising from these hazards.

2.3. PROCEDURES

To mitigate the potential effects to the environment or human health and safety, the following protection measures, which were committed to as part of the EA process, are conditions of Project approval or recognized as industry best practices, will be used. These have been grouped by general impact type. All procedures described herein are subject to revision according to any final environmental approval/permit conditions, where applicable.

In any event of an accident or malfunction, any employee or contractor observing the incident must:

- Ensure the safety of themselves and others present at the scene.
- <u>Immediately contact Site Security and emergency response personnel stating the</u> <u>nature of the incident, the location, and any potentially required resources.</u>
- Prevent access to the area by other employees, contractors and/or members of the public and attend the scene until emergency response personnel arrive on scene.
- When safe to do so, implement measures to contain any spill. Where the event presents safety concerns await the arrival of emergency personnel.
- If there is a spill, follow the Spills Response and Reporting Flowchart in Appendix 2-F and fill out the Internal Spill Report Form in Appendix 2-G.

2.3.1. Fire

Fires can result from either natural (lightning) or human causes (human error, equipment malfunctions or accidents). Fires present a hazard to health and property, with the extent of

concern dependant on the location of the fire, nearby facilities and its severity. A major fire at site could pose a serious health and safety concern, and could cause property damage and operations interruptions. Environmental impacts will include a temporary reduction of air quality and localized terrestrial habitat loss.

The following actions should be taken in the event of any fire being reported:

- 1. All work in the area of the fire is to stop, with personnel reporting to the nearest muster point;
- 2. The fire response crew should be alerted and sent to respond;
- 3. The Environmental Manager and/or Health and Safety Manager should be alerted; they should in turn communicate with appropriate external resources. They should communicate the nature of the emergency and whether assistance is required or if the external services should stand by for additional requests for assistance; and
- 4. The Communications Plan referred to in Section 2.7.2 will be implemented for large fires.

See Appendix 2-A for information on the classes of dangerous goods (hazard classification system) and their placards.

Measures to Avoid Occurrence

The Project has been designed to meet all applicable fire protection system requirements and codes. This includes, fire detection and suppression systems, sprinkler and standpipe systems and a fire hydrant system. Appropriate buffer areas have been established around facilities to prevent the spread of any fires, recognizing the overall intent to maintain a compact footprint to minimize environmental disturbance.

Remote buildings such as the explosives storage, explosives plant, temporary construction buildings, and pump houses will be equipped with portable extinguishers as required. A fire pumper truck will be present at the site and equipped with a foam generation system for use as required.

Regular fire drills will occur to ensure that all workers are familiar with fire response procedures, as dictated within the environmental management system. All workers and visitors on site will receive an orientation which includes fire reporting and response procedures.

Measures to Minimize or Manage the Occurrence

Priorities for fire response will be to protect human health and to ensure that the fire does not spread. A trained site fire response crew will provide the initial firefighting response, with assistance from local municipal volunteer fire fighting services potentially being requested. If local assistance is not sufficient, firefighting resources from Wawa could be called upon for assistance.

Prodigy will work closely with local authorities to ensure public health and safety is maintained at all times.

2.3.2. Uncontrolled Releases and Spills

A variety of liquid and solid chemicals, gases, and fuels will be transported to, stored at, and used at the Project site. An uncontrolled release of any of these materials would have the potential to cause harm to worker health and safety and/or the environment.

Sediment releases from settling ponds or other water management structures are discussed in Section 2.3.5 below.

Pressurized vessels are a necessary requirement to store certain gasses and liquids. There will be a number of pressurized vessels at the process plant used to store chemicals at the Site, most notably sulphur dioxide (SO₂) and oxygen (O₂). A portion of the ore processing is also completed under pressure (stripping vessel).

The worst possible uncontrolled release scenario would involve a catastrophic failure of a pressurized vessel, which due to the proximity of the tanks to other facilities, could be expected to cause bodily harm and potentially fatalities. For this scenario, significant damage to the process plant and environs is also likely to occur. Any damage envisioned is recoverable at a significant cost, except for issues associated with worker health and welfare.

In the event an uncontrolled release does occur, the following actions will be taken:

- 1. If safe to do so, any pumps or other sources will be shut down to stop the uncontrolled release of material;
- 2. If safe to do so, the pressure relief valves of any affected vessels will be activated if they have not already done so automatically;
- 3. All work in the area of the spill is to stop, with personnel reporting to the nearest muster point;
- 4. When the area is secured the leak or failure will be sealed if possible;
- 5. Absorbent materials or a downstream berm (earthen or snow) could be constructed to contain the spill. A large spill kit will be located at the fuel storage facility and will include absorbent material; and
- 6. The Communications Plan referred to in Section 2.7.2 will be implemented in the event of a catastrophic failure of pressurized vessels.
- 7. Follow the Spills Response and Reporting Flowchart in Appendix 2-F and fill out the Internal Spill Report Form in Appendix 2-G.

Some materials present (such as sodium cyanide during the cyanidation process) may release toxic hydrogen cyanide gas. To minimize exposure of toxic gas, the following actions will be taken:

- Sodium cyanide will be transported and stored as solid briquettes to reduce potential for gas leaks or liquid spills;
- Sodium cyanide will be mixed in small batches as needed during the cyanidation process to reduce the amount of hydrogen cyanide gas produced;

- 3. Mixing vessels will be tightly sealed to prevent leakage of any gas;
- The process plant will be equipped with automated sensors that trigger alarms for evacuation in the event of a hydrogen cyanide gas leak; and
- 5. Ventilation systems in the process plant will be equipped with a carbon filtration system to prevent hydrogen cyanide gas from venting to the outside atmosphere.

See Appendix 2-A for information on the classes of dangerous goods (hazard classification system) and their placards.

Measures to Avoid Occurrence

All chemicals such as liquid and solid reagents which pose a potential risk to the environment will be stored and as practical, used within contained areas, with sealed floors and sumps or drains reporting to facilities which will provide for retrieval of the spilled materials. As such there is no reasonable potential for such materials to be released directly to the environment or to have an environmental effect.

All chemicals used at the site will have a Material Safety Data Sheet (MSDS), in order to comply with the best practices in the industry for health and safety, and to provide relevant regulatory standards for the safe use of these materials. This inventory of on-site chemicals and their associated MSDS will have continual reviews and updates to remain current. These will also be used in the training programs conducted by the health and safety department personnel.

The following procedures will be taken to mitigate the potential for an uncontrolled release of a substance which could cause harm to worker health and safety and/or the environment:

- Pressurized vessels will be designed and constructed to industry standards, and will be operated in accordance with industry best practices. It is standard industry practice for all pressurized vessels to have relief valves to release excess pressure gradually if needed;
- 2. All pressurized vessels will be tested prior to entering service. Good safety practices will be following during any repairing or altering of the tanks subsequently, all work will be according to industry codes;
- 3. Appropriate systems will be in place, such as continual level transmitter, high level switch, flow meter, excess flow valve, pressure transmitter, dual venting system (for SO2), gas detection and alarms allowing a safe and automated operation;
- 4. Inspections and testing will occur on a regular basis of pressure relief systems, as well as periodically inspecting the tanks for corrosion in defects during operation;
- 5. All tankage and storage areas will be constructed to recognized industry standards and conform to Technical Standards and Safety Authority leak detection requirements;
- 6. Use of bollards (collision protection poles) and other measures to prevent collision; and Enviro tanks will be situated to minimize the risk from collision and puncturing of both walls and protected using bollards or similar; and
- 7. Enviro tanks will be situated to minimize the risk from collision and puncturing of both walls and protected using bollards or similar.

Measures to Minimize or Manage the Occurrence

The following measures will be in place to mitigate the effects if an uncontrolled release occurs:

- 1. The oxygen storage area includes a spill pad for liquid oxygen. Spills from the sulphur dioxide area will be managed in a containment area which will be cut off from the ventilation system in the event of a spill to prevent sulphur dioxide from entering other areas of the plant.
- 2. Containment berms will placed around all permanent tanks that do not have internal secondary containment; and
- 3. Storage areas are distant from water courses and sensitive habitat (except where impractical, such as the pump houses for the water intake, where a minimum buffer of 30 m will be maintained if powered by generators).

2.3.3. Explosion

Explosives needed for mine development will be prepared in dedicated explosives plant/storage areas located to the northwest of the process plant. Explosives used at the site are expected to be ammonium nitrate/fuel oil, but could also include emulsion or emulsion-blend explosives types.

Explosive components are not individually explosive when handled and stored properly, though the hazardous nature of the materials, such as the oxidizing nature of ammonium nitrate, is noted. Explosives will only explode if mixed in the correct proportions, placed under certain confined conditions, and detonated with an external device. Pre-packaged explosives also require an external detonation device. Nevertheless, the explosive component materials will be stored according to the supplier/manufacturer recommendations.

The worst possible scenario would involve improper handling of explosives by inexperienced personnel, resulting in bodily harm or fatalities. Damage to facilities, infrastructure and the local environment may be possible, but would generally only occur in association with the explosives storage, or where used at the open pit (or other blasting locations such as the process plant site during construction). Any damage envisioned is recoverable, except for issues associated with worker health and welfare.

In the event of an uncontrolled explosion, the following actions will immediately be taken:

- 1. Site Security is to be notified; a site-wide alarm will be sounded, and all work will stop with personnel reporting to the nearest muster station to check in. Staff at remote sites will check in by radio and remain at their location until given further direction;
- 2. External emergency services (police, fire, ambulance) will be notified by Site Security to ensure resources can be made available in the event of a fire or injuries; and
- 3. The Communication Plan (Section 2.7.2 of this document) will be implemented.

See Appendix 2-A for information on the classes of dangerous goods (hazard classification system) and their placards.

Measures to Avoid Occurrence

Any on-site explosives magazines or explosives manufacturing area will be located in accordance with the guidelines set out in the Quantity Distance Principles User's Manual published by the Explosives Regulatory Division of Natural Resources Canada with respect to the nearest inhabited building, airstrip, transmission lines, road and blast sites. This guide dictates locations of facilities, in part to ensure public safety.

The transportation of explosives is controlled by the Explosives Regulatory Division of Natural Resources Canada and the Transportation of Dangerous Goods Directorate (Transport Canada). All companies that transport explosives materials for the Project will be required to comply with the requirements of these agencies.

Explosives handling and storage is highly regulated in Canada and compliance is mandatory. The Project will use an explosives contractor that is well versed in the Canadian requirements, as dictated by the *Federal Explosives Act* and associated regulatory instruments and as enforced by Natural Resources Canada. All personnel who handle explosives will have appropriate training; all other individuals will be restricted from access.

An operational blasting plan will be developed by the explosives contractor describing all proposed blasting operations at the site (see the 'Blasting' section of *Drilling/Blasting, Fuel and Geotechnical Plan* in the CEMP (section 9)), and addresses:

- 1. Personnel responsibilities
- 2. Type of equipment and materials to be utilized
- 3. Safety requirements including pre- and post-blast notification and/or notices for site personnel, pre- and post-blast pit inspections
- 4. Periphery signs
- 5. Dust suppression
- 6. Spillage control and clean-up

Destruction of explosives (such as explosives unfit for use) and misfire procedures will be according to applicable regulatory instruments. Deteriorated explosives are potentially more hazardous than explosives in good condition, and will be handled with even more care under strict procedures. All destruction will be completed by experienced personnel.

It is believed that by contracting an experienced explosives firm, by following the regulatory requirements, and ensuring good housekeeping in general, explosives will be well managed at the site with minimal likelihood of inadvertent detonation or other accidents.

Measures to Minimize or Manage the Occurrence

During operations, explosives will not be stored or used in close proximity to the process plant or any other structure, and as a result, excessive damage and injuries to workers not involved in explosives preparation and use are not expected.

2.3.4. Vehicle / Equipment Collision or Upset

A vehicular accident on site could happen at any time of the year. On-site accidents are most likely to involve personnel vehicles or haul trucks transporting coarse materials (ore, mine rock or overburden). Off-site accidents could include construction materials and other nonhazardous materials needed for the Project. Accidents involving strictly personnel and the public will have a detrimental impact on the associated families and communities and on the Project. Notification and/or reporting will follow provincial (Ministry of Environment, Conservation and Parks (MECP)) and other applicable requirements.

Spill of diesel fuel from the haul trucks could result in fire or effects to water quality of nearby waterbodies. Any spill of non-hazardous material would not be expected to cause a significant environmental disturbance. Heavy materials such as mine rock could crush vegetation and compact any soil in the spill. Any impacts will be temporary in nature and readily remediated.

In the event of a collision or upset of vehicles or equipment the following steps will be immediately carried out by those involved and/or any first responders:

- 1. If safe to do so, all personnel should exit the vehicle/equipment and move away from the immediate scene. If there are injuries, operators should not move until they receive assistance;
- 2. Site Security should be called immediately with the details of the incident to close off the area, and notify any external resources if required (such as police, fire, ambulance in the event of serious injuries or collision on off-site roads). Site Security will also notify senior Project personnel (Mine Manager, Environmental Manager);
- 3. All work in the immediate area of the collision/upset is to stop, and traffic is to be directed around the area;
- 4. If diesel is spilled, the area will be monitored for an explosive atmosphere that could result in a fire; absorbent booms and banks of soil will be used to prevent the spread of diesel into waterbodies and any impacted material will be collected and disposed of using proper techniques; and
- 5. Any spilled mine rock that has been identified as potentially acid generating (PAG) will be removed to prevent any adverse effects to water quality.

See Appendix 2-A for information on the classes of dangerous goods (hazard classification system) and their placards.

Measures to Avoid Occurrence

The potential for environmental impacts associated with vehicular collision/upset will be minimized by the following operational procedures which will be incorporated into site policies and contractor contracts as possible:

- 1. Speed limits are to be strictly adhered to;
- 2. Oversized loads will only travel during daylight, to the extent practicable, to reduce the potential for collision; transportation of material during times of limited visibility will be avoided where possible;
- 3. Drivers will be required to meet all applicable regulatory training requirements,
- 4. All vehicles transporting materials to site will be required to maintain a supply of basic emergency response equipment, including communication equipment, first aid materials and a fire extinguisher;
- 5. Waste management and littering;
- 6. Regular maintenance of fuel trucks and other vehicles carrying hazardous materials; and
- 7. Penalties for operational violations.

Measures to Minimize or Manage the Occurrence

For accidents involving non-hazardous materials, the first goal will be to ensure public and worker health and safety. Thereafter, appropriate corporate and external personnel will be notified as appropriate, and spilled material will be removed. The affected environment will be rehabilitated if needed. After any major accident, a review will be conducted to ensure that the required design changes and/or procedures are in place to avoid a repeat.

Potential ignition sources will be removed in the event of a spill of flammable or combustible materials if safely possible, and the spill will be stopped or slowed. Appropriate corporate and external personnel will be notified, and an assessment will be conducted to determine the best means to prevent immediate environmental impacts. Spill countermeasures may include the use of absorbent materials, establishment of a collection trench downslope and setting collection booms on water if effective for the spilled material.

Prodigy will work closely with local authorities to ensure public health and safety is maintained at all times.

2.3.5. Failure of Hydraulic Structure

During construction of the Magino Project, a number of smaller hydraulic structures such as sedimentation ponds and coffer dams will be constructed at various locations around the site in order to manage water in areas where construction activities will take place, as well as to provide for treatment systems of waters which have come into contact with construction works.

The tailings management area dams have been designed to meet the most severe flood and earthquake criteria, being the probable maximum flood and maximum credible earthquake in accordance with the *Ontario Lakes and Rivers Improvement Act* requirements.

Failure or Imminent Failure of Hydraulic Structure

In the event of a failure or imminent failure of the Tailings Management Facility (TMF) dams the following actions will be carried out:

- 1. Any work in the area of the TMF dam is to cease and personnel are to evacuate the area;
- 2. Immediate shutdown of the tailings discharge pipeline from the process plant;
- 3. The Communications Plan (refer to Section 2.7.2 of this document) will be implemented to provide the appropriate notifications to Indigenous communities, any neighbouring residents, downstream communities, and regulatory authorities (including IAAC).
- Silt fences, turbidity curtains, sandbags and other erosion and sediment control measures will be deployed as possible to prevent the entry of sediments into a downstream waterbody;
- 5. Emergency repair will be carried out once it is safe to do so; and
- 6. The TMF pond could be pumped to the Water Quality Control Pond if possible to reduce the amount of released effluent during the emergency repair.
- 7. If the event of a failure of a hydraulic structure, where there is a release of a contaminant (including suspended solids) to water, follow the Spills Response and Reporting Flowchart in Appendix 2-F and fill out the Internal Spill Report Form in Appendix 2-G.

A remedial action plan would be developed in consultation with appropriate government agencies in the event of dam failure. Spilled tailings will need to be effectively contained to minimize the potential environmental impact. This means that Prodigy may need to excavate spilled tailings and return them to the repaired tailings management area. All areas where tailings are removed would be reclaimed to the extent practical.

See Appendix 2-A for information on the classes of dangerous goods (hazard classification system) and their placards.

Measures to Avoid Occurrence

Operational safeguards for construction water management structures include:

- 1. Inspection on a regular interval by site employees for any visible signs of concern and particularly during and after major storm events; and
- 2. Maintaining water levels such that risks of overtopping or other hydraulic failures are minimized.

The tailings management area dams will be designed to hold the environmental design flood for the Project over the maximum operating water level of the tailings management area dam. An emergency spillway will pass any flows in excess of the environmental design flood. Operational safeguards for the TMF include:

- 1. Visual inspections of the tailings management area dams daily during each 12 hour shift.
- 2. Piezometers and other geotechnical monitoring equipment will be installed to monitor any movement of the tailings management area dams and allow early maintenance if required.
- 3. Geotechnical inspections of the tailings management area dams will be conducted at regular intervals.

Measures to Minimize or Manage the Occurrence

The initial response of any failure will be to protect worker and environmental health and safety. Proper installation and maintenance of regular erosion and sediment control measures will be carried out in the course of construction to minimize the sediment load associated with construction water management structures.

In the event of a failure or imminent failure of any construction water management structures, the following actions will be carried out, consistent with EIS Commitment 87 and 112:

- 1. Pumping to the affected pond will immediately cease;
- 2. Emergency repair will be carried out once it is safe to do so;
- Silt fences, turbidity curtains, sandbags and other erosion and sediment control measures will be deployed as possible to prevent the entry of sediments into a downstream waterbody;
- 4. If required, a spill report will be lodged with applicable regulatory agencies and downstream health authorities will be notified.

2.4. MONITORING AND FOLLOW-UP PROGRAMS

The environmental monitoring team will use a plan-do-check-act approach to meeting the requirements of regulatory instruments and applicable law. The objective of the environmental monitoring approach will be to ensure that adjacent environments including the aquatic environment are not harmed as a result of the works.

The environmental monitoring team will implement a risk-based approach that will dictate monitoring requirements and frequency.

Appropriate monitoring for the various work areas and activities will be undertaken throughout the life of the Magino Project. These activities will consist of:

- Daily visual inspections of high-risk work areas will be undertaken, including dams, active excavations near watercourses, fuel and chemical storage areas; risk modifiers such as weather conditions may increase or decrease monitoring frequency at the discretion of site environmental staff;
- 2. The effectiveness of erosion and sediment control measures will be monitored, with notification to site environmental staff made and preventative maintenance or actions

taken if any deficiencies are noted in accordance with EIS Commitment 87 and 112 (see also the Sediment and Erosion Control Plan in the CEMP (section 10));

- 3. The conditions of all regulatory permits will be monitored;
- 4. Documentation from suppliers, contractors, delivery personnel, etc. will be reviewed to ensure appropriate licencing and other qualifications are maintained; and
- 5. All work areas will be inspected to ensure they are kept tidy and any hazardous and/or flammable material is properly stored and disposed of.

A surface water monitoring plan has been developed as part of the construction Environmental Compliance Approval [*ECA # to be added once received*] (included as part of the *Water Management Plan* in the CEMP (section 6)). If water quality monitoring finds that total suspended solids (TSS)/turbidity concentrations are greater than threshold values, activities will stop until sufficient sediment and erosion control measures are in place, or alternative methods will be used that do not cause runoff to surface water receivers or that produce runoff to meet the threshold values.

There is no requirement for a follow-up program related to accidents and malfunctions as part of the federal EA conditions.

2.5. FOLLOWING AN ACCIDENT OR MALFUNCTION

This Plan is a tool to ensure that Prodigy's objectives and environmental commitments are achieved. As part of adaptive management, these Plans will be living documents and will be updated on a regular basis to ensure that they capture/incorporate the requirements outlined in the terms and conditions of the Project authorization and permits, as well as other commitments made to Indigenous communities and local municipalities and stakeholders.

Follow up will be implemented by site environmental, health and safety, and specific work-area personnel following any accident or malfunction to ensure that measures are in place to prevent a recurrence of the event. The follow up programs will be implemented within seven days of the incident to help inform the required reporting (Section 2.7 below), and will include:

- 1. Review of incident reports, photographs, trip logs, or any other relevant documentation to determine the root cause of the incident;
- 2. Review of any applicable company and regulatory requirements and guidance such as permit conditions, provincial and/or federal regulations, company policies, or engineering/environmental criteria;
- 3. Wherever possible, interviews with personnel involved;
- 4. Inspections of the incident area to ensure any required clean-up has been effectively carried out;
- 5. In the event of an uncontrolled discharge to a watercourse (i.e. spill or sediment release), monitoring as necessary of the water quality, sediments, benthos and/or fish of downstream watercourses to assess any continuing impacts as a result of the incident; and

6. Any other actions or investigations which are deemed necessary to help prevent a future occurrence.

Following a malfunction or accident, the following actions will be taken:

- 1. Soils in the vicinity of a spill will be tested and the affected soils delineated. Impacted soil will either be treated onsite in a bioremediation area or hauled offsite for treatment and disposal;
- 2. Spilled fuel or other chemicals would be collected and hauled off site for disposal. Used absorbent material would be sent offsite to be disposed at a licenced facility;
- 3. Any affected tankage or equipment and associated mechanical systems will be inspected, repaired or replaced as needed, and tested prior to being brought back into service; and
- 4. Notification and/or reporting will follow Provincial (MECP) and other applicable requirements, including those requirements discussed in Section 2.7 below.

2.6. RELEVANT EMP-SPECIFIC AUTHORIZATIONS AND PERMITS FOR THE PROJECT

The following regulatory requirements or permits/approvals are applicable to activities which may result in an accident or malfunction and which require the implementation of protective measures during construction, operation and decommissioning:

- 1. Fisheries Act Authorization
- 2. Permit to Take Water
- 3. Environmental Compliance Approval
- 4. Lakes and Rivers Improvement Act authorizations

This Plan is subject to revision based on the final terms and conditions of any site approvals, as applicable to the related activities, as well as following review of actions taken in the event of an accident or malfunction.

2.7. REPORTING

2.7.1. Documentation

As part of the response to a malfunction or accident, all documentation required by regulatory authorities will be prepared and filed in a timely manner (typically within one week, or as otherwise prescribed in any Project approvals or applicable regulations).

For a minor event where external notification is not required (such as a minor vehicle collision with no injuries, a non-reportable spill), a form such as that contained in Appendix 2-B or for a spill the form in Appendix 2-G will be completed by the person who identifies the incident and will be filed at site. This information will be kept in the event it is requested by a relevant authority, or for use in revising procedures to avoid a future occurrence.

For more significant events, this same information will be prepared in a standalone report format, to allow for inclusion of additional information. For spills, complete the form in

Appendix 2-G. See also the reporting to IAAC noted as part of the Communication Plan in Section 2.7.2 below.

The goal of this reporting is to accurately document the event and improve site designs/operational practices to prevent a future occurrence.

2.7.2. Communications Plan (Notifications)– Internal/External

This Communication Plan addresses the requirements of EA condition 8.4 (notification and reporting), 8.5 (communication plan), and EIS Commitment 52.

In the event of an accident or malfunction, the following communication, notification and reporting procedures are required. See also the Spills Reporting and Reporting Flowchart in Appendix 2-F.

- In the event of a spill or discharge of pollutants or contaminants (including explosives), it will be reported immediately to Site Security, the Project or Site Manager and the site Environmental Manager (Environmental Department). See Appendix 2-A for information on the classes of dangerous goods (hazard classification system) and their placards.
- Dangerous Goods Emergency: In the event of an emergency involving dangerous goods, call CANUTEC at 1-888-CAN-UTEC (226-8832), 613-996-6666 or *666 on a cellular phone. The Transport Canada Emergency Response Guidebook can be found online at: <u>https://tc.canada.ca/en/dangerous-goods/canutec/2020-emergency-response-guidebook</u>.
- Spills will be reported to the MECP Spills Action Centre (SAC) in accordance with O.Reg.
 675/98, at a minimum. The SAC operates 24 hours a day and can be reached through a Province-wide toll-free number:

1-800-268-6060 or at 416-325-3000.

Environmental officers who receive the calls at the SAC can provide advice and information related to spills or drinking water events through a series of operating procedures. They can also activate a field response when needed or initiate service continuity arrangements if necessary. See also the description of typical reportable and exempt from reporting construction site spills in Appendix 2-D for additional information. The Spill Reporting poster in Appendix 2-E may also be displayed on-site as a reference.

- As per EA condition 8.4.1, in all instances of an accident or malfunction with the potential to cause adverse environmental effects, the following actions shall be taken:
 - a) As soon as possible, notify by telephone and e-mail:
 - Indigenous communities, referring to the single master Indigenous Communities Master Contact List in Appendix 2.3 of the CEMP, for current contact information
 - ii. relevant authorities and
 - b) notify the IAAC in writing (via e-mail) no later than 24 hours following the accident or malfunction.

- **c)** For the notification to Indigenous communities and the IAAC, the report shall specify:
- The date the accident or malfunction occurred;
- Description of the accident or malfunction;
- A list of any substances potentially released in the environment as a result of the accident or malfunction.

For Current Contact Information Refer to:

- Appendix 2.3 of the CEMP: Indigenous Communities Master Contact List
 - Appendix 2.4 of the CEMP: Regulators Master Contact List
- 5. As per EA condition 8.4.2, **submit a written report to the IAAC no later than 30 days** after the day on which the accident or malfunction occurred. The written report shall include:
 - A detailed description of the accident or malfunction and of its adverse environmental effects and any associated potential health risks;
 - A description of the measures that were taken to mitigate the adverse environmental effects caused by the accident or malfunction;
 - Any view(s) from Indigenous communities and advice from relevant authorities received with respect to the accident or malfunction, its adverse environmental effects, the associated potential health risks and the measures taken to mitigate these adverse environmental effects;
 - A description of any residual adverse environmental effects and any modified or additional measures required to mitigate residual adverse environmental effects; and
 - Details concerning the implementation of this Plan.
- 6. As per EA condition 8.4.3, **submit a written report to the IAAC no later than 90 days after the day on which the accident or malfunction** occurred that includes a description of changes made to avoid a subsequent occurrence of the accident or malfunction and of the modified or additional measure(s) implemented by the Proponent to mitigate and monitor residual adverse environmental effects and to carry out any required progressive reclamation, taking into account the information submitted in the written report described above. The report shall include all additional views from Indigenous communities and advice from relevant authorities received by the Proponent.

2.8. FORMS

A summary form for minor incidents is included in Appendix 2-B.

An internal report form for spills is included in Appendix 2-G.

APPENDIX 2-A: HAZARD CLASSIFICATION SYSTEM AND PLACARDS

DANGEROUS GOODS EMERGENCY:

In the event of an emergency involving dangerous goods, call CANUTEC at: 1-888-CAN-UTEC (226-8832); 613-996-6666; or *666 on a cellular phone.

The information presented below is reproduced from the 2020 Emergency Response Guidebook, for the purposes of assisting in identification of a potential hazardous material. The Guidebook is available at:

https://tc.canada.ca/en/dangerous-goods/canutec/2020-emergency-response-guidebook

HAZARD CLASSIFICATION SYSTEM

The hazard class of hazardous materials/dangerous goods is indicated either by its class (or division) number or name. Placards are used to identify the class or division of a material. The hazard class or division number must be displayed in the lower corner of a placard and is required for both primary and subsidiary hazard classes and divisions, if applicable. For other than Class 7 placards, text indicating a hazard (for example, "CORROSIVE") is not required. Text is shown only in the U.S. The hazard class or division number and subsidiary hazard classes or division numbers placed in parentheses (when applicable), must appear on the shipping paper after each proper shipping name.

Class I	Explosives				
	Division 1.1	Explosives which have a mass explosion hazard			
	Division 1.2	Explosives which have a projection hazard but not a mass explosion hazard			
	Division 1.3	Explosives which have a fire hazard and either a minor blast hazard or a minor projection hazard or both, but not a mass explosion hazard			
	Division 1.4	Explosives which present no significant hazard			
	Division 1.5	Very insensitive explosives with a mass explosion hazard			
	Division 1.6	Extremely insensitive articles which do not have a mass explosion hazard			
Class 2	Gases				
	Division 2.1	Flammable gases			
	Division 2.2	Non-flammable, non-toxic* gases			
	Division 2.3	Toxic* gases			
Class 3	Flammable liquids (and Combustible liquids [U.S.])				
	Flammable solids				
Class 4	Substances liable to spontaneous combustion				
	Substances which, on contact with water, emit flammable gases				
	Division 4.1	Flammable solids, self-reactive substances and solid desensitized explosives			
	D	Culestan and lights to an enter second such as a first second such as a			
	Division 4.2	Substances liable to spontaneous compustion			
	Division 4.2 Division 4.3	Substances liable to spontaneous combustion Substances which in contact with water emit flammable gases			
Class 5	Division 4.2 Division 4.3 Oxidizing sul	Substances liable to spontaneous combustion Substances which in contact with water emit flammable gases bstances and Organic peroxides			
Class 5	Division 4.2 Division 4.3 Oxidizing sul Division 5.1	Substances liable to spontaneous combustion Substances which in contact with water emit flammable gases bstances and Organic peroxides Oxidizing substances			
Class 5	Division 4.2 Division 4.3 Oxidizing sul Division 5.1 Division 5.2	Substances liable to spontaneous combustion Substances which in contact with water emit flammable gases bstances and Organic peroxides Oxidizing substances Organic peroxides			
Class 5 Class 6	Division 4.2 Division 4.3 Oxidizing sul Division 5.1 Division 5.2 Toxic* substa	Substances liable to spontaneous combustion Substances which in contact with water emit flammable gases bstances and Organic peroxides Oxidizing substances Organic peroxides ances and Infectious substances			
Class 5 Class 6	Division 4.2 Division 4.3 Oxidizing sul Division 5.1 Division 5.2 Toxic* substa Division 6.1	Substances liable to spontaneous combustion Substances which in contact with water emit flammable gases bstances and Organic peroxides Organic peroxides ances and Infectious substances Toxic* substances			
Class 5 Class 6	Division 4.2 Division 4.3 Oxidizing sul Division 5.1 Division 5.2 Toxic* substa Division 6.1 Division 6.2	Substances liable to spontaneous combustion Substances which in contact with water emit flammable gases bstances and Organic peroxides Organic peroxides ances and Infectious substances Toxic* substances Infectious substances			
Class 5 Class 6 Class 7	Division 4.2 Division 4.3 Oxidizing sul Division 5.1 Division 5.2 Toxic* substa Division 6.1 Division 6.2 Radioactive	Substances liable to spontaneous combustion Substances which in contact with water emit flammable gases bstances and Organic peroxides Organic peroxides ances and Infectious substances Toxic* substances Infectious substances materials			
Class 5 Class 6 Class 7 Class 8	Division 4.2 Division 4.3 Oxidizing sul Division 5.1 Division 5.2 Toxic* substa Division 6.1 Division 6.2 Radioactive of Corrosive sul	Substances liable to spontaneous combustion Substances which in contact with water emit flammable gases bstances and Organic peroxides Organic peroxides ances and Infectious substances Toxic* substances Infectious substances materials bstances			

* The words "poison" or "poisonous" are synonymous with the word "toxic".



TABLE OF MARKINGS, LABELS, AND PLACARDS USE THIS TABLE ONLY IF MATERIALS CANNOT BE SPECIFICALLY IDENTIFIED BY AND INITIAL RESPONSE GUIDE TO USE ON-SCENE USING THE SHIPPING PAPER, NUMBERED PLACARD, OR ORANGE PANEL NUMBER



In some cases, such as on drums or international bulk containers (IBCs), which must address information for all sectors, the GHS label may be found in addition to the required transport labels and placards. Both types of labels (GHS and transport) will differ in a way that will make them easy to identify during an emergency.

GHS Pictograms	Physical hazards	GHS Pictograms	Health and Environmental hazards
\land	Explosive;	\wedge	Skin corrosion;
	Self-reactive;	£.	Serious eye damage
	Organic peroxide		
\land	Flammable;		Acute toxicity (harmful);
	Pyrophoric;		Skin sensitizer;
	Self-reactive;		Irritant (skin and eye);
	Organic peroxide;		Narcotic effect;
	Self-heating;		Respiratory tract irritant;
	Emits flammable gases when in contact with water		Hazardous to ozone layer (environment)
	Oxidizer		Respiratory sensitizer;
< 2 >			Mutagen;
			Carcinogen;
			Reproductive toxicity;
			Target organ toxicity;
			Aspiration hazard
\diamondsuit	Gas under pressure		Hazardous to aquatic environment
	Corrosive to metals		Acute toxicity (fatal or toxic)

APPENDIX 2-B: MALFUNCTION OR ACCIDENT (WITH MATERIAL ENVIRONMENTAL EFFECT) SUMMARY FORM – MINOR INCIDENT

For a spill, complete the Internal Spill Report Form in Appendix 2-G.

Description	of Malfunction or Accident
Date	
Time	
Description	
Suspected C	ause (if Known) / Proposed Investigation (if cause not known)
Suspected e	
Recommend	led Follow-up Actions / Measures to Prevent a Future Occurrence
L	

Prepared by:

APPENDIX 2-C: EA CONDITIONS/EIS COMMITMENTS RELATED TO ACCIDENTS AND MALFUNCTIONS

The federal EA approval received via the Decision Statement issued on January 24, 2019³ included a suite of EA conditions; those relevant to Accidents and Malfunctions are included in Table 2-C-1 below. In addition, Prodigy made commitments in the EIS with respect to Accidents and Malfunctions (December 2018⁴); these are summarized in Table 2-C-2.

EA Conditions Related to Accidents and Malfunctions (January 2019)				
Condition #	Action Required			
EA Condition 8.1	"The Proponent shall take all reasonable measures to prevent accidents and			
	malfunctions that may result in adverse environmental effects."			
EA Condition 8.2	"The Proponent shall, prior to construction, consult with Indigenous groups and relevant			
	authorities on the measures to be implemented to prevent accidents and malfunctions."			
EA Condition 8.3	"The Proponent shall, prior to construction and in consultation with Indigenous groups			
	and relevant authorities, develop an accident and malfunction response plan in relation			
	to the Designated Project. The accident and malfunction plan shall include:			
	8.3.1 the types of accidents and malfunctions that may cause adverse environmental			
	effects;			
	8.3.2 the measures to be implemented in response to each type of accident and			
	malfunction referred to in condition 8.3.1 to mitigate any adverse environmental			
	effect(s) caused by the accident or malfunction; and			
	8.3.3 the role of Indigenous groups in the implementation of the accident and			
	malfunction plan."			
EA Condition 8.4	"In the event of an accident or malfunction with the potential to cause adverse			
	environmental effects, the Proponent shall immediately implement the measures			
	appropriate to the accident or malfunction as described in the accident and malfunction			
	response plan referred to in condition 8.3.2 and shall:			
8.4.1 notify, as soon as possible, Indigenous groups and relevant authorities of the				
	accident or malfunction, and notify the Agency in writing no later than 24 hours			
	following the accident or malfunction. For the notification to Indigenous groups and the			
	Agency, the Proponent shall specify:			
	8.4.1.1 the date the accident or malfunction occurred;			
	8.4.1.2 a description of the accident or malfunction;			
	8.4.1.3 a list of any substances potentially released in the environment as a result of the			
	accident or malfunction.			
	8.4.2 submit a written report to the Agency no later than 30 days after the day on which			
	the accident or malfunction occurred. The written report shall include:			
	8.4.2.1 a detailed description of the accident or malfunction and of its adverse			
	environmental effects and any associated potential health risks;			

Table 2-C-1: Federal EA	Conditions Related to	Accidents and Ma	lfunctions (Janua	rv 2019)
	contantions nerated to		ij aničenonio (saniae	

³ Canadian Environmental Assessment Agency. January 2019. *Decision Statement Issued Under Section 54 of the Canadian Environmental Assessment Act, 2012 for the Magino Gold Project*. <u>https://iaac-aeic.gc.ca/050/documents/p80044/126612E.pdf</u>

⁴ Prodigy Gold Inc. December 2018. *Magino Project Commitments List*. <u>https://iaac-aeic.gc.ca/050/documents/p80044/125783E.pdf</u>

EA Conditions Related to Accidents and Malfunctions (January 2019)							
Condition #	Action Required						
	8.4.2.2 a description of the measures that were taken by the Proponent to mitigate the adverse environmental effects caused by the accident or malfunction;8.4.2.3 any view(s) from Indigenous groups and advice from relevant authorities						
	received with respect to the accident or malfunction, its adverse						
	environmental effects, the associated potential health risks and the measures						
	taken by the Proponent to mitigate these adverse environmental effects;						
	8.4.2.4 a description of any residual adverse environmental effects and any modified of						
	additional measures required by the Proponent to mitigate residual adverse						
	environmental effects; and						
	8.4.2.5 details concerning the implementation of the accident or malfunction response						
	plan referred to in condition 8.3.						
	8.4.3 submit a written report to the Agency no later than 90 days after the day on which						
	the accident or malfunction occurred that includes a description of changes made to						
	avoid a subsequent occurrence of the accident or malfunction and of the modified or						
	additional measure(s) implemented by the Proponent to mitigate and monitor residual						
	adverse environmental effects and to carry out any required progressive reclamation,						
	taking into account the information submitted in the written report pursuant to						
	condition 8.4.2. The report shall include all additional views from Indigenous groups and						
	advice from relevant authorities received by the Proponent since the views and advice						
	referred to in condition 8.4.2.3 were received by the Proponent." [Note: The reference to						
	9.4.2.3 in condition 8.4.3 has been revised to 8.4.2.3 (there is no 9.4.2.3)]						
EA Condition 8.5	"The Proponent shall develop a communication plan in consultation with Indigenous						
	groups. The Proponent shall develop the communication plan prior to construction and						
	shall implement and keep it up to date during all phases of the Designated Project. The						
	plan shall include:						
	8.5.1 the types of accident and malfunction requiring the Proponent to notify the						
	respective Indigenous groups;						
	8.5.2 the manner by which Indigenous groups shall be notified by the Proponent of an						
	accident or malfunction and of any opportunities for the Indigenous groups to assist in						
	the response to the accident or malfunction; and						
	8.5.3 the contact information of the representatives of the Proponent that the						
	Indigenous groups may contact and of the representatives of the respective Indigenous						
	groups to which the Proponent provides notification."						

Table 2-C-2: Prodigy's EIS Commitments Related to Accidents and Malfunctions (December 2018)

EIS Commitments Related to Accidents and Malfunctions (December 2018)				
Commitment #	Action Required			
EIS Commitment 30	"Mitigation measures are identified below which could further avoid or reduce the			
	severity of the adverse effects on Migratory and Breeding Birds			
	•The Emergency Response and Spills Control Plan will ensure that spills are contained			
	and cleaned up effectively to minimize exposure of birds to potential contaminants."			
EIS Commitment 52	"Prodigy will notify relevant parties as determined by the Health and Safety;			
	Emergency Response. Indigenous groups will be notified in the event of an			
	emergency."			
EIS Commitment 57	"All transport of the explosive chemicals will be by a licensed explosive contractor			
	with the driver trained in handling and spill management of the components."			
EIS Commitment 87	"The mitigation measures identified below consider the project design and effects			
	analysis and will be implemented to avoid or reduce the severity of any adverse			
	effects on sediment quality:			
	• Development of a Spills Prevention and Response Plan that provides a framework			
	for action, clean up and monitoring.			
	Monitoring to assess effectiveness of mitigation and enhancement measures."			
EIS Commitment 112	"Mitigation measures are identified below which consider the design of the Project			
	and the results of the effects analysis, to avoid or reduce the severity of effects on			
	water quality:			
	• Development of a Spills Prevention and Response Plan that provides a framework			
	for action, clean up and monitoring.			
	• Monitoring to assess effectiveness of mitigation and enhancement measures."			
EIS Commitment 114	"Transportation of fuels will be contracted to a licenced qualified contractor. Fuels			
	will be transported in trucks specifically designed to carry these materials. The			
	transporters will be fully licensed to carry these materials and split kits will be			
	supplied on each vehicle. The drivers will be trained in spill management and nave a			
	supplies required to be carried on the trucks will be defined in the EPSPC Plan "			
EIS Commitmont 117	"Taking into consideration the design of the Project and the results of the effects			
	analysis further mitigation measures are identified below to further avoid or reduce			
	the soverity of the adverse effects on Community Vitality:			
	Provide a trained on-site Emergency Response Team that includes the necessary			
	vehicles and equipment "			
FIS Commitment 118	"Taking into consideration the design of the Project and the results of the effects			
	analysis further mitigation measures are identified below to further avoid or reduce			
	the severity of the adverse effects on Infrastructure and Services:			
	• The Project will have a trained on-site Emergency Response Team including vehicles			
	and equipment.			
	• An detailed Emergency Response Plan will be established for the Project.			
	• Liaison and consultation with local and regional emergency service providers will			
	occur to plan for potential Project-related on- and off-site events, and develop			
	mitigation as appropriate (e.g., comprehensive sharing of information related to			
	hazards, resources, materials and the emergency response plan, inspections. training			
	related to transportation, and possible responses to on-site calls).			
	• The Prodigy Emergency Response Team will be made available for mutual aid."			

EIS Commitments Related to Accidents and Malfunctions (December 2018)			
Commitment #	Action Required		
EIS Commitment 135	"The Emergency Response and Spill Contingency plan will be fully developed prior to		
	commencing construction."		

APPENDIX 2-D: TYPICAL CONSTRUCTION SITE SPILLS: EXTERNAL REPORTABILITY TO THE SPILLS ACTION CENTRE SPILL REPORTING POSTER

Table 2-D-1: Spills Reportable to the Spills Action Centre

Quantity	Pollutant/Conditions	reference:
ALL	Any Spills to Water, including sediment or off-specification	Environmental
	water	Protection Act
ALL	All fluids at are NOT part of the operating component of a	Environmental
	vehicle, released to the natural environment	Protection Act
>100 Litres	Fuels that are from the operating components of vehicle	Environmental
	(e.g. gas tank), released to the natural environment	Protection Act
>100 Litres	Fuels from Bulk Stationary Fuel Tanks that have restricted	
	access (i.e. no public access), released to the natural	Environmental
	environment	Protection Act

Table 2-D-2: Spills Exempt from Reporting to the Spills Action Centre

	EXEMPT FROM REPORTING	
Quantity	Pollutant/Conditions	reference:
<100 Litres	Fuels that are from the operating components of vehicle	
	(e.g. gas tank)	O. Reg. 675/98 S. 6
<100 Litres	Fuels from Bulk Stationary Fuel Tanks that have restricted	
	access (i.e. no public access)	O. Reg. 675/98 S. 8
		Environmental
All	Spills indoors (i.e. not released to the Natural Environment)	Protection Act

APPENDIX 2-E: SPILL REPORTING POSTER

Spill Reporting

REPORT ALL SPILLS INTERNALLY TO:

REPORT these spills to the Spills Action Centre (1-800-268-6060)

• ALL Spills to Water (including sediment)



- If into the Natural Environment:
- Fuel >100L from operating component of vehicle (gas tank)
- Fuel >100L from Bulk Storage tank (Stationary)
- Any amount of:
 - Hydraulic Oil
 - Fuel/gasoline from a container/mobile tank
 - Antifreeze
 - Any other chemical or potential pollutant



These specific spills are **EXEMPT** from reporting to the Spills Action centre:

- Fuel <100L from operating component of vehicle (gas tank)
- Fuel <100L from Bulk Storage tank (Stationary) that is not accessible to the public
- Completely contained indoors

WHEN IN DOUBT, REPORT THE SPILL!

APPENDIX 2-F: SPILLS RESPONSE AND REPORTING FLOWCHART



APPENDIX 2-G: SPILL REPORTING FORM

ARGONAUT GOLD	Magino Project - Internal Spill Report Form						
PRODIGY COLD INCORPORATED	Division or Contractor	Name:					
	Name of Person Repor	ting Spill:		Date:			
IF YOU DISCOVER A SPILL: ✓ <u>check boxes as you complete:</u>							
2 - STOP the source	of the spill						
3 - CONTAIN the sp	iled material						
4 - NOTIFY As Soo	n As Possible:						
Site Security	Occurrity Descent of Marrie	Data	The s				
Project Manager	PM Name	Date	Time				
Environmental Dept.	PWINAII	Date					
	Env. Dept. Rep. Name	Date	Time				
5 - COMPLETE this inform	ation and return it to the Constr	uction Manager and E	nvironmental Departi	nent BY THE END OF THE SHIFT			
DATE OF SPILL:		TIME OF	SPILL:				
MATERIAL SPILLED:							
QUANTITY SPILLED:		DURATIC	IN OF SPILL:				
OWNER OF SPILLED M	ATERIAL: D Prodigy Gol	d ⊡ Contra	ctor:				
LOCATION OF SPILL:							
CAUSE OF SPILL:							
IS THE SPILL CONTAIN	ED: I YES I NO	DID THE SPILLED MA	TERIAL CONTACT	WATER: I YES I NO			
HOW WAS THE SPILL O	CLEANED UP:						
WHERE WAS THE SPIL	L CLEAN-UP MATERIAL DISP	OSED OF:					
WERE THERE ANY ADV DESCRIBE:	/ERSE EFFECTS AS A RESUL	T OF THE SPILL: E	JYES DNG	>			
WHAT ACTIONS SHOU	LD BE TAKEN TO AVOID FUTU	JRE SIMILAR INCIDE	NTS:				
OTHER COMMENTS:							
Internal Investigation	Complete		DATE:				
Submitted to Environ	mental Manager and Construct	ion Manager	DATE:				
SIGNED:	-		DATE:				
MANDATORY SPILL RE	PORTING To be Completed	by: Site Environm	ental Manager or D	Construction Manager			
		prime		backup			
AND	erous Goods? LINO LIYes - C/	ALL Canutec: 1-888-3	20-8832				
Is the spill reportable to the Spills Action Centre? (Refer to Spill Reporting Flowchart) DNo DYes - CALL SAC: 1-800-268-6060							
Comments/Notes:							
To be Completed by Kyle Stanfield							
Indigenous Commun	tiies Notified		<u>1</u>	0183.			
Federal Compliance & Enforcement IAAC via email							
Written reports (2) to Compliance & Enforcement IAAC via email							