



February 1, 2023

Mr. Dayne Doucet
Consolidated Mining Permit Lead
Oregon Department of Geology and Mineral Industries
Mineral Land Regulation & Reclamation
229 Broadalbin St SW
Albany, Oregon 97321

**RE: Submittal of Documents in Response to Comment 248 in October 20, 2022,
Comments for the Consolidated Permit Application, Grassy Mountain Mine Project**

Dear Mr. Doucet:

This letter accompanies the submittal of the document listed below in response to Comment 248 in the October 20, 2022, Comments for the Consolidated Permit Application.

- D9Petro-ContSoilsMgntPlan 2022-10.pdf

The document submittal record for Comment 248 is attached. Please see the “Revised Response to Comments (Jan 2023)” information for your consideration.

Please contact me at (775) 625-3600, glen@paramountnevada.com if you have questions or need clarification.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Glen van Treek', written over a horizontal line.

Glen van Treek
President

Calico Resources USA Corp./Paramount Gold Nevada Corp.
(775) 625-3600
glen@paramountnevada.com

Att: Document Submittal Record

Attachment
Document Submittal Record

Comment Number: 248		Category: 1	Status: D (Preliminary Not Resolved)
Topic: Hazardous Materials, Safety, Accident Prevention, and Emergency Response		CPA Reference: [2019 CPA] Appendix Y SWPCP pg. 9 2.1.2, 2.1.5	
Comment: DEQ			
No application or supporting materials received for an industrial solid waste landfill, which is referenced in the CPA documents.			
2 PROJECT DESCRIPTION			
Calico Resources USA Corp. (Calico) plans to construct, operate, reclaim, and close an underground mining and precious metal milling operation. In general, the proposed mining and precious metal processing operations will consist of an underground mine and ore processing facilities, including a conventional mill and tailings storage facility (TSF) and a waste rock storage area (WRSA), as well as other support facilities. The Project will include the following major components:			
- Ancillary facilities that include the following: haul, secondary, and exploration roads; truck workshop; warehouse; stormwater diversions; sediment control basins; reagent and fuel storage; storage and laydown yards; explosive magazines; fresh water storage; monitoring wells; meteorological station; an administration/security building; borrow areas; growth media stockpiles; a landfill; and solid and hazardous waste management facilities to manage wastes; and			
Proposed Resolution: Submit a permit application for an industrial solid waste landfill that complies with requirements in OAR 340-093 and 340-095, including:			
• Permit application • Recommendation from local jurisdiction • Payment of fees • Site characterization report • Detailed plans and specifications • Written closure plan • Evidence of Financial Assurance			
Initial Response (Dec 2021): No landfill is proposed for the site.			
Stantec – Comment Addressed as Indicated?		Stantec – Preliminary Assessment – Sufficient Response?	
No. The updated Petroleum-Contaminated Soils Management Plan (October 2021) maintains that ‘...a landfill; and solid and hazardous waste management facilities to manage wastes’ are major project components.		No. If a landfill and solid and haz waste facilities are not proposed for the project, the management plan should be revised accordingly.	
TRT Response (Oct 2022):			
The project includes four solid waste disposal facility elements:			
- the TSF (a captive industrial solid waste landfill, intended as a permanent solid waste disposal facility that also functions as a wastewater containment facility),			
- the waste rock dump (a captive industrial solid waste landfill, intended as a temporary solid waste storage facility),			

Document Submittal:

Comment Number: 248	Category: 1	Status: D (Preliminary Not Resolved)
- concrete neutralization of the waste rock (a solid waste treatment facility), and - the underground backfill (a solid waste land disposal facility). ORS 459.215 provides facilities operated under a permit issued under ORS 468B.050 are not required to obtain a permit from the Department of Environmental Quality pursuant to ORS 459.205. However, exclusion from the permit requirements of ORS 459.205 does not relieve any person from compliance with other requirements of ORS 459.005 to 459.105 and 459.205 to 459.385 and the rules and regulations adopted pursuant thereto. The application must submit to DEQ all the required elements for a solid waste permit as required by OAR 340-093, 340-095, 340-096, and 097. Where the requirements have been substantively been met under the WPCF permit application, please clearly indicate.		
Preliminary Response to Comment (Nov 2022): The Petroleum-Contaminated Soils Management Plan was edited to remove reference to a solid waste landfill and solid/hazardous waste management facility as neither of these are planned for the facility.		
Agency Comment (Jan 2023): N/A		
Revised Response to Comment (Jan 2023): The Petroleum-Contaminated Soils Management Plan (CPA Appendix D9) was edited to remove reference to a solid waste landfill and solid/hazardous waste management facility as the solid waste activity onsite would not be used to dispose of petroleum-contaminated soils. ORS 459.215 provides those facilities that operate under a permit issued under ORS 468B.050 are not required to obtain a permit from the DEQ pursuant to ORS 459.205. However, compliance with ORS 459.005 to 459.105 and 459.205 to 459.385 as well as OAR 340-093, -095, -096 and -097 is required. A cross-reference to the OAR 340-093, -095, -096, and -097 rules was developed and shared as a response to Comment 363. This cross-reference demonstrates compliance with rules that are applicable to the TSF and the TWRSF. The underground backfill meets the definition of "Clean Fill" per OAR-340-093-0030(18) and therefore is not a regulated solid waste activity. The concrete rock material is exempt from the definition for "Disposal Site" per OAR-340-093-0030(38) and therefore is not a regulated solid waste activity.		