



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 363 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 363 in the October 20, 2022, Comments for the Consolidated Permit Application.

- Solid Waste Rules Cross-reference table.pdf

The document submittal record for Comment 363 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', is 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 363

Document Submittal: Solid Waste Rules Cross-reference table.pdf

Comment Number: 363		Category: 2	Status: D (Preliminary Not Resolved)
Topic: Land Use		CPA Reference: General	
Comment: OAR 340-093-0130 requires that the site characterization report includes, among other things, a list of adjacent landowners and a map showing the boundaries of those adjacent properties. This was not found in the application.			
Proposed Resolution: Revise application to include this information.			
Initial Response (Dec 2021): OAR 340-093-0130 is not applicable. The Site Characterization report as required by OAR 340-093-0070(3)e is applicable for a new disposal site permit. This project is not applying for a disposal permit. This application does include a list of adjacent landowners and a map showing the boundaries of those adjacent properties. See Table 1 and Map 3.			
Stantec – Comment Addressed as Indicated? Yes	Stantec – Preliminary Assessment – Sufficient Response? Yes	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), - 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): N/A			
Agency Comment (Jan 2023): N/A			
Revised Response to Comment (Jan 2023): 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 OAR 340-093, -095, -096, and -097 rules was developed and submitted for agency review on February 1, 2023, and will be incorporated into the CPA. 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.			