



January 30, 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 270 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 270 in the October 20, 2022, Comments for the Consolidated Permit Application.

- D3WasteMgntPlan 2022-10.pdf

The document submittal record for Comment 270 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 the printed name and title.

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 270

Document Submittal: D3WasteMgmtPlan 2022-10.pdf

Comment Number: 270		Category: 2	Status: D
Topic: Hazardous Materials, Safety, Accident Prevention, and Emergency Response		CPA Reference: Consolidated Permit Application, Section 3.4.2, Page #199 and 3.6..6, Page #217	
Comment: DEQ Comment: Section 3.4.2 first paragraph, states that the site is expected to be a CESQG (<100kg/month HW generation). Whereas; section 3.6.6 states that the facility anticipates they will be a SQG (>100kg – <1000kg /month of HW generation)			
Initial Response (Dec 2021): The Waste Management Plan identifies small quantity generator and large quantity generator requirement (Section 6). See Appendix D3 of the CPA.			
Stantec – Comment Addressed as Indicated? Yes; however, the category is not indicated for the mine operator.	Stantec – Preliminary Assessment – Sufficient Response? Uncertain. The lack of a category assignment (e.g., SQG, LQG, VLQG) and definitions only may not be sufficient according to the comment. To be determine.		TRT Response (Oct 2022):
Preliminary Response to Comment (Nov 2022): CPA Section 3.4.2 will be edited to indicate Small Quantity Generator status is anticipated.			
Agency Comment (Jan 2023):			
Revised Response to Comment (Jan 2023): Our preliminary response referred to Section 3.4.2, which does not exist in the current CPA. Sections 3.8.3 and 3.9.8 both state that the Mine is expected to be in the “small quantity generator” category as defined by the EPA. The Waste Management Plan (CPA Appendix D3) assumes an SQG status. LQG requirements are provided in the event the Mine becomes an LQG; however, this is not expected nor planned.			