



April 6, 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 476 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 476 in the October 20, 2022, Comments for the Consolidated Permit Application.

- D4Stormwater Pollution Control Plan 2023-03.pdf
- LUCS Grassy Mtn LUCS 2.27.23 searchable.pdf (previously submitted with response to Comment 479)

The document submittal record for Comment 476 is attached. Please see the “Response (Apr 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 faint, stylized outline of a mountain range.

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 # 476

Comment Number: 476		Category: 1	Status: B (Not Resolved)
Topic: NPDES, 1200-Z Stormwater		CPA Reference: Grassy Mountain Mine National Pollutant Discharge Elimination System 1200-Z Stormwater Permit Application	
Comment:			
1) Land Use Compatibility Statement did not check box for Water Quality NPDES Stormwater General Permit (1200-Z); 2) Per Schedule A.8.b of the 1200-Z Permit, page 16, please include the 40 CFR 122.22 statement page that is signed and certified; 3) Identify on a site map the locations of springs, wetlands and other surface water bodies both on site and adjacent to the site, per Schedule A.10.b.i.(15) of the 1200-Z permit; 4) Per Schedule E.G.4.2.6, show proposed topsoil stockpile locations on site maps and provide narrative in the SWPCP for stockpile technology-based effluent limits (TBELS); 5) Per Schedule E.G.4.1.8, prior to use of sediment treatment with cationic treatment you must notify your applicable DEQ regional office or agent in advance and receive authorization under this permit after you have included appropriate controls and implementation procedures designed to ensure that your use of cationic treatment chemicals will not lead to a violation of water quality standards; 6) Change Section 4.1 Reporting Monitoring Data to accurately reflect electronic reporting. Some of the language depicts instructions for paper DMR reporting which is no longer applicable; 7) Per Schedule E.G.6.2, show on site maps proposed access and haul roads; 8) Per Schedule A.10.b.i.(19), show on site maps bulk chemical storage and transfer areas; 9) Please add specific information pertaining to road maintenance of existing access roads and construction of new road cuts addressing any steep slopes; 10) Figure 2 shows a temporary waste rock dump within the tailings facility footprint. If this is temporary, show location(s) of potential future waste rock dump(s), list potential pollutant source(s) and include TBELS to eliminate pollutant discharges in stormwater (waste rock characterization is acid-generating). Note that any changes to site conditions following permit approval will require a revised SWPCP to be submitted to DEQ for review; and 11) Construction vs operations; please make sure SWPCP revisions are submitted through YDO as required by Schedule A.9.			
Initial Response (Dec 2021): Items 3 and 8 are addressed by other documents within the CPA: Item 3 - Refer to Wetland Delineation Report, Appendix A, last figure "Wetland Map Book". Item 8 - Refer to Mill Design Report Drawing 101768-0000-G-103 for the location of and transfer areas for cyanide detox tank, carbon-in-leach tanks and process water tank. All other tanks are indoors. Item 7 is provided on SWPCP Figure 2. Item 10 response: The TWRSF is the only waste rock dump and is located above the requisite containment system where all water in contact with waste rock is managed in the TSF process fluid system. There will be no discharge of stormwater from the TWRSF as addressed in the TSF/TWRSF Design report. All waste rock will be removed through on-going mining activities or during reclamation. In closure, the TWRSF will be removed and reclaimed."			
Preliminary Response to Comment (Nov 2022): N/A			
Agency Comment (Jan 2023): N/A			

Comment Number: 476	Category: 1	Status: B (Not Resolved)
Response (Apr 2023): CPA Appendix D4, Stormwater Pollution Control Plan (SWPCP), has been updated as follows: 1) Land Use Compatibility Statement updated and included as Appendix E to SWPCP. 2) 40 CFR 122.22 statement page added to SWPCP. Signed and certified. 3) There are no springs or wetlands but other water bodies have been added to site figures. 4) Proposed topsoil stockpile locations added to site maps and narrative included in SWPCP for stockpile technology-based effluent limits (TBELS). 5) Added discussion about requirements for cationic treatment. 6) Added clarification that DMRs are submitted electronically via YourDEQOnline (YDO). 7) Site maps edited to include proposed access and haul roads. 8) Site maps edited to include bulk chemical storage and transfer areas. 9) Information added to address road maintenance for existing roads and construction of new road cuts addressing steep slopes. 10) TWRSF is within the zero-discharge area. clarification was added to SWPCP regarding post mining operation plans for removal and reclamation of this area. 11) Clarification added to note SWPCP revisions are submitted via YDO. The revised SWPCP (March 2023) and a searchable PDF of the Land Use Compatibility Statement (LUCS), signed on February 27, 2023, were submitted to DOGAMI on April 6, 2023. The LUCS file was also previously submitted in response to Comment 479.		