March 28, 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 Comments 270 and 274 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 Comments 270 and 274 in the October 20, 2022, Comments for the Consolidated Permit Application.

- *Waste Management Plan* (March 2023)

The document submittal records are attached. Please see the "Response (Mar 2023)" information for your consideration.

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

Sincerely,

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

Att: Document Submittal Records

Attachment
Document Submittal Records

Comment Number: 270

Comment Number: 270	**Category:** 2 **Status:** C (Preliminary Resolved)	
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	
Commentor: 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) Proposed Resolution: Reevaluate the hazardous waste generation and revise either section to state the same. Note that the Bevill Exclusion does not exempt Mineral Processing (significant physical/chemical processes) or waste generated from laboratory or maintenance activities)		
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):		
Response (Feb 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.		
Response (Mar 2023): The CPA will be edited as stated in our February response. In addition, the *Waste Management Plan* (CPA Appendix D3) has been updated, and uploaded to DOGAMI on March 28, 2023, as follows: • Section 2.1, Regulations: Added Oregon Administrative Rules 340-109, Management of Pesticide Waste, and 340-135, Toxic Use Reduction and Hazardous Waste Reduction Regulations. • Section 2.2.2, Hazardous Waste: Footnote 1 pertaining to the Bevill Exclusion has been updated to state: The "Bevill Exclusion" is an amendment to RCRA, which provides that "mining and mineral processing wastes generated by extraction, beneficiation, and processing activities" are exempt from regulation as hazardous wastes. The Bevill Exclusion does not exempt mineral processing with significant physical/chemical processes or waste generated from laboratory or maintenance activities. • Section 6.3, Hazardous Waste Determination: Clarification has been provided pertaining to process waste streams. • Section 7.6, Carbon Fines, and Section 7.24, Process Streams: Performing a waste determination added and reference made to Section 6.3. • Section 7.33, Sediment: New section added to address sediment accumulation in the Collection Pond and performing a waste determination.		

Comment Number: 274

Comment Number: 274	**Category:** 2 **Status:** C (Preliminary Resolved)	
Topic: Hazardous Materials, Safety, Accident Prevention, and Emergency Response	**CPA Reference:** Consolidated Permit Application, Section 3.3, pp. 113-196	
Commentor: DEQ Comment: Multiple processes in the milling operation generate precipitates and waste materials, both liquids and solids. The CPA should define the characteristics of these wastes and their disposition. For instance, the carbon-in-leach process includes sulfide precipitation. What are the characteristics of the precipitate and how is it handled and disposed? Similarly, what are the characteristics of the precipitates generated during the cyanide detoxification process and how are they disposed? What are the characteristics of the waste carbon fines generated from the carbon regeneration process that cannot be re-used in the elution process and how are they handled? Proposed Resolution: Applicant should provide details concerning the handling and disposal/ treatment of wastes generated during the chemical mining processes.		
Initial Response (Dec 2021): These wastes are described in more detail in the Waste Management Plan, provided in Appendix D3 of the CPA.		
Stantec – Comment Addressed as Indicated? Yes	**Stantec – Preliminary Assessment – Sufficient Response?** Yes	**TRT Response (Oct 2022):**
Preliminary Response to Comment (Nov 2022):		
Agency Comment (Jan 2023):		
Response (Mar 2023): The *Waste Management Plan* (CPA Appendix D3) has been updated, and uploaded to DOGAMI on March 28, 2023, as follows: • Section 2.1, Regulations: Added Oregon Administrative Rules 340-109, Management of Pesticide Waste, and 340-135, Toxic Use Reduction and Hazardous Waste Reduction Regulations. • Section 2.2.2, Hazardous Waste: Footnote 1 pertaining to the Bevill Exclusion has been updated to state: The "Bevill Exclusion" is an amendment to RCRA, which provides that "mining and mineral processing wastes generated by extraction, beneficiation, and processing activities" are exempt from regulation as hazardous wastes. The Bevill Exclusion does not exempt mineral processing with significant physical/chemical processes or waste generated from laboratory or maintenance activities. • Section 6.3, Hazardous Waste Determination: Clarification has been provided pertaining to process waste streams. • Section 7.6, Carbon Fines, and Section 7.24, Process Streams: Performing a waste determination added and reference made to Section 6.3. • Section 7.33, Sediment: New section added to address sediment accumulation in the Collection Pond and performing a waste determination.		