



GOVERNMENT OF  
NEWFOUNDLAND AND LABRADOR  
Department of Environment and Climate Change

## CERTIFICATE OF APPROVAL

Pursuant to the Environmental Protection Act, SNL 2002 c E-14.2 Section 83

Issue Date: *March 27, 2023*

Approval No. AA23-035696

Expiration: *March 27, 2028*

File No. 732.425

Proponent: **Tacora Resources Inc.**  
102 NE Third Street  
Suite 120  
Grand Rapids, MN 55744

Attention: **Sharlene Baird - Environment & IH Superintendent**

Re: **Operation of Scully Mine at Wabush**

---

Approval is hereby given for the operation of an iron ore mine and mill at Wabush, including: pit dewatering, processing ore to concentrate, disposal of tailings at Flora Lake, and other associated works.

This Certificate of Approval does not release the proponent from the obligation to obtain appropriate approvals from other concerned provincial, federal and municipal agencies. Nothing in this Certificate of Approval negates any regulatory requirement placed on the proponent. Where there is a conflict between conditions in this Certificate of Approval and a regulation, the condition in the regulation shall take precedence. Approval from the Department of Environment and Climate Change shall be obtained prior to any significant change in the design, construction, installation, or operation of the Scully Mine, including any future expansion of the Scully Mine. This Certificate of Approval shall not be sold, assigned, transferred, leased, mortgaged, sublet or otherwise alienated by the proponent without obtaining prior approval from the Minister.

This Certificate of Approval is subject to the terms and conditions as contained therein, as may be revised from time to time by the Department. Failure to comply with any of the terms and conditions may render this Certificate of Approval null and void, may require the proponent to cease all activities associated with this Certificate of Approval, may place the proponent and its agent(s) in violation of the *Environmental Protection Act*, and will make the proponent responsible for taking such remedial measures as may be prescribed by the Department. The Department reserves the right to add, delete or modify conditions to correct errors in the Certificate of Approval or to address significant environmental or health concerns.

  
For **MINISTER**

## TERMS AND CONDITIONS FOR APPROVAL No. AA23-035696

March 27, 2023

### General

1. This Approval is for the operation of an iron ore mine and mill at Wabush, including pit dewatering, processing ore to concentrate, disposal of tailings at Flora Lake, and other associated works.
2. Any inquiries concerning this Approval shall be directed to the St. John's office of the Pollution Prevention Division (telephone: (709) 729-2556; or facsimile: (709) 729-6969).
3. In this Certificate of Approval:
  - **accredited** means the formal recognition of the competence of a laboratory to carry out specific functions;
  - **acutely lethal**, in respect of an effluent, means that the effluent at 100 per cent concentration kills more than 50 per cent of the rainbow trout subjected to it for a period of 96 hours, when tested in accordance with Reference Method EPS 1/RM/13; or more than 50 per cent of the Daphnia magna subjected to it for a period of 48 hours, when tested in accordance Reference Method EPS 1/RM/14;
  - **air contaminant** means any discharge, release, or other propagation into the air and includes dust, fumes, mist, smoke, particulate matter, vapours, gases, odorous substances, acids, soot, grime or any combination of them;
  - **ALT (acute lethality test)** means a test conducted to determine whether an effluent is acutely lethal;
  - **associated product** means petroleum or a derivative of it, except gasoline, which is in a liquid state at ambient temperature and pressure;
  - **batch** means oil from one tank with nothing added to the tank between withdrawals;
  - **BOD<sub>5</sub>** means biochemical oxygen demand (five day test);
  - **CO** means carbon monoxide;
  - **CO<sub>2</sub>** means carbon dioxide;
  - **composite sample** means a quantity of undiluted effluent collected continually at an equal rate or at a rate proportionate to flow over a designated sampling period;
  - **Department** means the Department of Environment and Climate Change and its successors;

- **DGSNL** means Digital Government and Service NL and its successors;
- **DOC** means dissolved organic carbon;
- **effluent discharge criteria (EDC)** means the maximum allowable levels for the parameters listed in Table 4;
- **EDMS** means environmental data management system;
- **grab sample** means a quantity of undiluted sample collected at any given time. In this Approval it refers to used oil and effluent;
- **hazardous waste** means a product, substance or organism that is intended for disposal or recycling, including storage prior to disposal or recycling, and that:
  - (a) is listed in Schedule III of the *Export and Import of Hazardous Waste Regulations under the Canadian Environmental Protection Act, 1999*;
  - (b) is included in any of Classes 2 to 6, and 8 and 9 of the *Transportation of Dangerous Goods Regulations under the Transportation of Dangerous Goods Act, 1992*; or
  - (c) exhibits a hazard classification of a gas, a flammable liquid, an oxidizer, or a substance that is dangerously reactive, toxic, infectious, corrosive or environmentally hazardous;
- **licensed** means has a Certificate of Approval issued by the Minister to conduct an activity;
- **liquid waste** is defined by the *Slump Test* (Canadian Standards Association test method A23.2-5C. The liquid waste slump test involves placing the waste in a 30 cm open inverted cone. The cone is removed and the immediate decrease (slump) in height of the waste material is measured. If the material slumps such that the original height is reduced by 15 cm or more, the waste is considered liquid;
- **malfunction** means any sudden, infrequent and not reasonably preventable failure of air pollution control equipment, wastewater treatment equipment, process equipment, or a process to operate in a normal or usual manner. Failures caused in part by poor maintenance or careless operation are not malfunctions;
- **MDMER** means the federal *Metal and Diamond Mining Effluent Regulations*.
- **Minister** means the Minister of the Department;
- **NO<sub>x</sub>** means oxides of nitrogen;
- **oil separator** means a device used to separate and remove oily wastes from oil and water mixtures;
- **Plan** means the specific plan as identified in the section of this Approval within which it is used. For example, in the *Waste Management Plan* section it refers to the Waste Management Plan;
- **PM<sub>2.5</sub>** means particulate matter with a diameter of 2.5 µm or less;

- **QA/QC** means Quality Assurance/Quality Control;
- **register(ed)** in the context of:
  - storage tanks, means that information regarding the storage tank system has been submitted to a DGSNL office and a registration number has been assigned to the storage tank system;
  - dispersion modelling, means submitted to and approved by the Department in accordance with departmental policy and guidelines; and
  - environmental site assessment and impacted site management work, means approved by the Department in accordance with departmental policy and guidelines;
- **regulated substance** means a substance subject to discharge limit(s) under the *Environmental Control Water and Sewage Regulations, 2003*;
- **Site Professional** means an individual who is registered with the Department to oversee environmental site assessment, remediation and contaminated site management work in Newfoundland and Labrador;
- **SO<sub>2</sub>** means sulfur dioxide;
- **SOP** means Standard Operating Procedure;
- **stack** means a chimney, flue, conduit or duct arranged to conduct an air contaminant into the air;
- **storage tank system** means a tank and all vent, fill and withdrawal piping associated with it installed in a fixed location and includes a temporary arrangement;
- **Tacora** means Tacora Resources Inc.;
- **TDS** means total dissolved solids;
- **toxic pass** means a mortality rate of no more than 50 per cent during the ALT;
- **TPH** means total petroleum hydrocarbons, as measured by the Atlantic PIRI method;
- **TPM** means total particulate matter with diameters less than 100µm;
- **TSS** means total suspended solids;
- **used glycol** means glycol that, through use, storage or handling, can no longer be used for its original purpose; and
- **used oil** means oil that, through use, storage or handling, can no longer be used for its original purpose.

4. All necessary measures shall be taken to ensure compliance with all applicable acts, regulations, policies and guidelines, including the following, or their successors:
- *Environmental Protection Act;*
  - *Water Resources Act;*
  - *Air Pollution Control Regulations, 2022;*
  - *Environmental Control Water and Sewage Regulations, 2003;*
  - *Halocarbon Regulations;*
  - *Storage and Handling of Gasoline and Associated Products Regulations, 2003;*
  - *Used Oil and Used Glycol Control Regulations;*
  - *Heating Oil Storage Tank System Regulations, 2003;*
  - *Storage of PCB Waste Regulations, 2003;*
  - *Ambient Air Monitoring Guidance Document;*
  - *Sampling of Water and Wastewater - Industrial Effluent Applications Guidance Document;*
  - *Accredited Laboratory Policy;*
  - *Effluent Schedule Determination Policy for Industries*
  - *Compliance Determination Guidance Document;*
  - *Source Emission Testing Guidance Document;*
  - *Plume Dispersion Modelling Guidance Document;*
  - *Precipitation Drainage of Dyke Areas Guidance Document;*
  - *Environmental Guidelines for Controlling Emissions of Volatile Organic Compounds from Aboveground Storage Tanks; and*
  - *Guidance Document for the Management of Impacted Sites.*

This Approval provides terms and conditions to satisfy various requirements of the above listed acts, regulations, Departmental policies and guidelines. If it appears that any of the pertinent requirements of these acts, regulations, policies and guidelines are not being met, then a further review of the works shall be conducted, and suitable pollution control measures may be required by the Minister.

5. All reasonable efforts shall be taken to minimize the impact of the operation on the environment. Such efforts include:
- minimizing the area disturbed by the operation,
  - minimizing air, water or soil pollution,
  - finding alternative uses, acceptable to the Department, for waste or rejected materials,
  - removing equipment or structures when they no longer have further use, and
  - considering the requirement for the eventual rehabilitation of disturbed areas when planning the development of any area on the facility property.
6. Tacora shall provide to the Department, within a reasonable time, any information, records, reports or access to data requested or specified by the Department.
7. Tacora shall keep all records or other documents required by this Approval at the Scully Mine for a period of not less than three years, beginning the day they were made. These records shall be made available for review by officials of the Department or DGSNL when requested.
8. Should Tacora wish to deviate in any way from the terms and conditions of this Certificate of Approval, a written request detailing the proposed deviation shall be made to the Department. Tacora shall comply with the most current terms and

conditions until the Department has authorized otherwise. In the case of meeting a deadline requirement, the request shall be made at least 60 days ahead of the applicable date as specified in this Approval or elsewhere by the Department.

### **Activities Affecting Bodies of Water**

9. Any work that must be performed in a body of water below the high water mark shall be carried out during a period of low water levels, unless otherwise permitted in writing by the Department.
10. All construction operations shall be carried out in a manner that minimizes damage to land, vegetation, and watercourses, and which prevents the discharge of substances, to bodies of water, in excess of applicable regulatory limits.
11. The use of heavy equipment shall be confined to dry stable areas and shall not be carried out in streams or bodies of water, unless otherwise permitted in writing by the Department.
12. All vehicles and equipment shall be in good repair, and shall be free of leaks of oil or other harmful substances that could impair water quality.
13. During the construction of concrete components, formwork shall be properly constructed to prevent any fresh concrete from entering a body of water. Dumping of concrete or washing of tools and equipment in any body of water is prohibited.
14. Waste hardened concrete shall not be disposed as unsuitable material at the project site. Waste hardened concrete shall be put to beneficial use on site as fill material, or it shall be sent to an approved waste disposal site.
15. All areas affected by this project shall be restored to a state that resembles local natural conditions. Further remedial measures to mitigate environmental impacts on water resources can and will be specified, if necessary in the opinion of this Department.
16. Prior written permission is required from the Department for all work that takes place within 15 metres of a body of water, including but not limited to bridges, culverts, fording, stream modifications, infilling and dredging.

### **Environmental Protection Plan**

17. Tacora shall implement the most recent version of the Environmental Protection Plan. This Plan shall be reviewed annually and revised as necessary, accounting for expanding or alteration of activities. All proposed revisions shall be submitted to the Department for review.

### **Waste Management**

18. The management of waste generated at the facility is subject to compliance with the *Environmental Protection Act*. All non-industrial waste shall be stored in a manner acceptable to the Department and, on at least a weekly basis, be disposed of:

- at an authorized waste disposal site, with the permission of the owner/operator of the site; or
- by some other means acceptable to the Department.

If required, industrial waste shall be disposed of by a licensed operator.

19. Tacora shall ensure that all volatile chemical and solvent wastes, if they cannot be reused, are placed in suitable covered containers for disposal in a manner acceptable to the Department. Disposal of liquid wastes at waste disposal sites in the province is not permitted.
20. Disposal of hazardous waste in a municipal or regional waste disposal site in this Province is prohibited. Transporters of hazardous waste shall have an Approval issued by the Minister. Those generating hazardous waste shall have a waste generators number issued by the Department and shall also complete the required information outlined in the Waste Manifest Form.

### **Waste Management Plan**

21. Tacora shall continue to implement the Waste Management Plan (*May 29, 2018 revised November 21, 2022*) for Scully Mine, including all revisions. Every year the Plan shall be reviewed and revised as necessary, accounting for expanding or alteration of activities. All proposed revisions shall be submitted to the Department for review.

### **Acid Generating Waste Rock**

22. Only non-acid generating waste rock shall be reused on the surface. If waste rock is identified as potentially acid generating or metal leaching, an appropriate waste rock management program shall be developed to handle, store, and appropriately dispose of the material.

### **Burning Prohibition**

23. Materials listed in Table 1 shall not be burned in a fire, unless the burning of the material is recommended, in writing, by the Office of the Fire Commissioner or the burning occurs in combustion process equipment that has been approved, in writing, by the Department for that purpose.

<b>Table 1 - Materials Prohibited from Burning in a Fire</b>	
(a) tires	(k) manure
(b) plastics	(l) rubber
(c) treated lumber	(m) tar paper
(d) asphalt and asphalt products	(n) railway ties
(e) drywall	(o) paint and paint products

(f) demolition waste	(p) fuel and lubricant containers
(g) hazardous waste	(q) used oil
(h) biomedical waste	(r) animal cadavers
(i) domestic waste	(s) hazardous substances
(j) trash, garbage, or other waste from commercial, industrial or municipal operations	(t) materials disposed of as part of the removal or decontamination of equipment, buildings or other structures

24. The Department shall be notified prior to the burning of any materials not listed in Table 1.

### Noise

25. Efforts shall be made to minimize and control noise resulting from the Scully Mine operational activities. All vehicles hauling materials within the facility shall have exhaust and muffling devices in good working order.

### Dust Suppression

26. Tacora shall control dusting resulting from construction and operational activities at the site. Use of dust suppressants other than water or calcium chloride shall require approval of the Director. Tacora are encouraged to use best management practices when applying calcium chloride or any other approved dust suppressant.
27. Tacora shall progressively vegetate the tailings impoundment area.
28. Tacora shall develop programs for dust suppression within the operation. These shall address dust from the mines, haul roads, tailings and production drills and development drills. Each year, by *October 1*, the effectiveness of the programs shall be evaluated and any changes shall be submitted to the Department for review.
29. Each year, by *March 15*, Tacora shall submit, to the Department for review, a report of the activities of the previous year and the planned activities for the upcoming year with respect to tailings deposition, tailings re-vegetation, and the minimization of dust lift-off. The report shall include a summary of the status of the tailings including the area (hectares) that is: active, inactive, vegetated (total), vegetated during previous year, remaining to be vegetated and planned vegetation for the coming year.

### Spill and Leak Prevention and Containment

30. Areas in which chemicals are used or stored shall have spill containment systems constructed with impermeable floors, walls, dykes or curbs as applicable and be configured, maintained, inspected and repaired as follows:
- they shall not discharge to the environment;
  - they shall have an effective secondary containment capacity of at least 110% of the chemical storage tank capacity, in the case of a single storage container;
  - if there is more than one storage container, the spill containment system shall



be able to retain no less than 110% of the capacity of the largest container or 100 % of the capacity of the largest container plus 10% of the aggregate capacity of all additional containers, whichever is greater;

- they shall be kept clear of material that may compromise the containment capacity;
- they may include a floor drain system provided that the floor drains, and the place or device to which they drain, are configured in such a manner that the required effective secondary containment capacity is maintained;
- every year they shall be visually inspected for their liquid containing integrity, and repairs shall be made when required; and
- once every ten years, spill containment systems shall be inspected, by a means other than visual inspection, for their liquid containing integrity, and repairs shall be made when required.

31. All on site storage of petroleum shall comply with the *Storage and Handling of Gasoline and Associated Products Regulations, 2003*, or its successor. Storage tank systems shall be registered with DGSNL.
32. Where applicable, all tanks and fuel delivery systems shall be inspected to appropriate American Petroleum Institute or Underwriters' Laboratories of Canada standards, or any other standards acceptable to this Department. The required frequency of inspections may be changed at the discretion of the Department.
33. Refuelling and maintenance of vehicles and equipment shall, whenever possible, be undertaken on a prepared impermeable surface with a containment or collection system for spills or leaks of fluids (eg. hydrocarbons, coolants and other associated fluids). When this is not possible, due care shall be taken to prevent spillage or leakage on the ground and to the surrounding environment, particularly streams and other water bodies. The Contingency Plan for Tacora's operations shall detail the specific response actions in the event of a spill or leak from refuelling or maintenance activities.

### Contingency Plan

34. Tacora shall continue to implement the Contingency Plan (*November 21, 2022*) for Scully Mine, including all revisions. This Plan describes the actions to be taken in the event of a spill or leak of a toxic or hazardous material. Copies of the Plan shall be placed in convenient areas throughout the facility so that employees can easily refer to it when needed. Tacora shall ensure that all employees are aware of the Plan and understand the procedures and the reporting protocol to be followed in the event of an emergency. An annual response exercise is recommended for response personnel. Every year, as a minimum, the Plan shall be reviewed and revised as necessary. Any proposed significant revisions shall be submitted to the Department for review. Changes which are not considered significant include minor variations in equipment or personnel characteristics which do not affect implementation of the Plan.
35. Every time Tacora implements the Contingency Plan, information shall be recorded for future reference. This will assist in reviewing and updating the Plan. The record is to consist of all incidents with environmental implications, and include such details as:
  - date;
  - time of day;

- type of incident (i.e. liquid leak or spill, gas leak, granular chemical leak or spill, equipment malfunction, etc.);
- actions taken;
- problems encountered; and
- other relevant information that would aid in later review of the Plan performance.

Each incident report shall be submitted to the Department as per the *Reporting* section.

### Rehabilitation and Closure

36. A Rehabilitation and Closure Plan detailing the actions to be taken to restore areas disturbed by the operation has been submitted to the Department (*February 2017 or as amended*). The Plan shall be implemented progressively as required and completed upon site closure.
37. As part of the site decommissioning and restoration process, Tacora shall employ a registered Site Professional to complete a site-wide environmental site assessment, as defined in the *Guidance Document for the Management of Impacted Sites*. Should impacts be identified, Tacora shall proceed through the process outlined in the Guidance Document to achieve regulatory site closure.

### Fuel

38. Tacora is permitted to accept and combust in its boilers No. 6 fuel oil. Tacora shall not accept and combust any other fuel without the prior written approval of the Department.
39. Tacora shall obtain a certificate of analysis for a representative sample of each shipment of No. 6 fuel oil and each batch of combustible used oil, as per Table 2. All results shall be submitted to the Department as per the *Reporting* section.

Table 2 – Fuel Oil Analysis Program		
Fuel	Frequency	Parameters
No. 6 Fuel Oil	Each shipment prior to accepting delivery	A.P.I. Gravity @ 60 °F Density (kg/m <sup>3</sup> @ 15°C) Flash Point Pour Point Sulfur % by weight BTU's per US Gallon Ash % by weight Sediment % by weight Water % by volume Polychlorinated Biphenyls (PCBs) Total Organic Halogens (as Chlorine) Complete Metals Scan

40. Tacora shall maintain and submit to the Department on a monthly basis the following:
- Per shipment of No. 6 fuel oil: supplier, date of shipment, volume, and

- certificate of analysis. **EDMS location code 00719;**
- Monthly No. 6 fuel oil combustion volume. **EDMS location code 00719;**
- Monthly diesel combustion from the mine. **EDMS location code 00720;**
- Monthly diesel combustion from all other non-mine sources collectively. **EDMS location code 00719;**

As necessary, best estimates may be used. These shall be submitted as per the *Reporting* section.

### **Used Oil and Used Glycol**

41. Used oil and used glycol shall not be mixed and shall be stored in separate:
  - closed containers;
  - registered tanks; or
  - tanks that have an active approval from DGSNL.
42. Where greater than 205 litres of used oil or used glycol is stored in one or more containers, the storage shall require approval from the Department or DGSNL.
43. Used oil and used glycol shall be disposed of by a company licensed for the handling and disposal of such products.
44. Information on used oil and used glycol that is generated at the facility shall be submitted to the Department for review by *January 31* of each year. This shall include a description of the:
  - type(s) of oil and/or glycol used;
  - approximate total volume of used oil and/or used glycol generated during the previous year; and
  - method of disposal for the used oil and/or used glycol.
45. In the event that used oil and/or used glycol generated off-site is stored in the on-site storage tank(s), the information listed above shall also be required for the off-site systems.
46. The use or operation of an oil separator requires registration under the *Used Oil and Used Glycol Control Regulations*. Applications for registration shall be submitted to, and registration numbers are assigned by, DGSNL.

### **Boiler Ash**

47. Tacora shall, prior to the disposal of each batch, have the boiler ash tested (complete metal scans, including mercury) to verify that it does not contain hazardous constituents. A report including the results of analysis and quantity of boiler ash to be disposed, shall be submitted to the Department as per the *Reporting* section.
48. Where all contaminant concentrations are below, or equal to, the maximum allowable levels outlined in the *CSQG*, for industrial land use, the ash is not considered hazardous and may be disposed in an approved waste disposal site, provided the owner/operator is willing to accept such waste and the local DGSNL regional office has agreed with the disposal of the ash at the site.

49. Where one or more contaminant concentrations were in excess of the maximum allowable levels outlined in the *CSQG*, for industrial land use, the ash shall be further tested using the US Environmental Protection Agency Method 1311, the Toxicity Characteristic Leaching Procedure (TCLP), or other procedure as determined by the Department. Contaminants which shall be tested, using the TCLP, are those which were in excess of the maximum allowable levels outlined in the *CSQG*, for industrial land use. Results of analysis of the extractant shall be submitted to the Department as per the *Reporting* section.
50. Where all contaminant concentrations in the extractant are below the maximum allowable levels, as determined by the Department, the ash is not considered hazardous and may be disposed in an approved waste disposal site, provided the owner/operator is willing to accept such waste and the local DGSNL regional office has agreed with the disposal of the ash at the site.
51. Where one or more contaminants in the extractant are above the maximum allowable levels, as determined by the Department, the ash is considered a hazardous waste and will not be approved for disposal in a waste disposal site in this Province. Transporters of hazardous waste shall have an Approval issued by the Minister. Those generating hazardous waste shall have a waste generators number issued by the Department and shall also complete the required information outlined in the Waste Manifest Form.
52. Alternate ash disposal options shall require prior review and authorization by the Department.

### Effluent Monitoring and Discharge

53. Tacora shall perform an Effluent Monitoring Program as per Table 3. Refer to Table 4 for the effluent discharge criteria (EDC). Analytical results shall be submitted as per the *Reporting* section.

<b>Table 3: Effluent Monitoring Program</b>			
<b>EDMS Location Code</b>	<b>Location</b>	<b>Parameters</b>	<b>Frequency</b>
00306	Tailings Line Emergency Dump Basin #1 (Settling Basin)	pH and TSS	Weekly (at least 24 hours apart)
		ALT and TPH	Monthly (at least 15 days apart)
		EDC (except ALT)	Weekly (at least 24 hours apart)
00307	East Pit 2 Dewatering (Sylvio Settling Basin)	pH and TSS	Weekly (at least 24 hours apart)
		ALT and TPH	Monthly (at least 15 days apart)
		EDC (except ALT)	Weekly (at least 24 hours apart)
00308	West Pit Dewatering (Settling Basin)	pH and TSS	Weekly (at least 24 hours apart)
		ALT and TPH	Monthly (at least 15 days apart)
		EDC (except ALT)	Weekly (at least 24 hours apart)
00309	Knoll Lake Discharge (Settling Basin)	pH and TSS	Weekly (at least 24 hours apart)
		ALT and TPH	Monthly (at least 15 days apart)
		EDC(except ALT)	Weekly (at least 24 hours apart)
00310	Flora Lake Discharge	pH and TSS	Weekly (at least 24 hours apart)
		ALT and TPH	Monthly (at least 15 days apart)
		EDC(except ALT)	Weekly (at least 24 hours apart)

**Table 4 – Effluent Discharge Criteria (EDC) (As of June 1, 2021)**

Parameter	Maximum Authorized Monthly Mean Concentration	Maximum Authorized Concentration in a Composite Sample	Maximum Authorized Concentration in a Grab Sample
Arsenic	0.30 mg/L	0.45 mg/L	0.60 mg/L
Copper	0.30 mg/L	0.45 mg/L	0.60 mg/L
Cyanide	0.50 mg/L	0.75 mg/L	1.00 mg/L
Lead	0.10 mg/L	0.15 mg/L	0.20 mg/L
Nickel	0.50 mg/L	0.75 mg/L	1.00 mg/L
Zinc	0.50 mg/L	0.75 mg/L	1.00 mg/L
Total Suspended Solids	15.00 mg/L	22.50 mg/L	30.00 mg/L
Radium 226	0.37 Bq/L	0.74 Bq/L	1.11 Bq/L
Un-ionized ammonia	0.50 mg/L expressed as nitrogen (N)	Not applicable	1.00 mg/L expressed as nitrogen (N)
Acute Lethality	Toxic Pass		
pH	5.5 to 9 pH units		

54. Tacora may reduce the frequency of testing for a parameter that is set out in the EDC with the exception of pH, TSS, ALT and Radium 226 to not less than once in each calendar quarter, at least 30 days apart, if that parameter's monthly mean concentration in the effluent is less than 10 percent of the maximum authorized monthly mean concentration for the 12 consecutive months immediately preceding the most recent test. Tacora shall notify the Department in writing, at least 30 days in advance of a reduction in the frequency of testing.
55. Tacora may reduce the frequency of testing for Radium 226 to not less than once in each calendar quarter, at least 30 days apart, if that substance's concentration in the effluent is less than 0.037Bq/L in 10 consecutive tests. Tacora shall notify the Department in writing, at least 30 days in advance of a reduction in the frequency of testing.
56. Tacora shall increase the frequency of testing to the originally prescribed frequency for a parameter that is set out in the EDC with the exception of pH, TSS and ALT, if the parameter's monthly mean concentration is equal to or greater than 10 percent of the maximum authorized monthly mean concentration.
57. Tacora may reduce the frequency of conducting ALTs to once in each calendar quarter, at least 30 days apart, if the effluent is determined not to be acutely lethal over a period of 12 consecutive months. Tacora shall notify the Department in writing, at least 30 days in advance of a reduction in the frequency of testing.
58. If a sample is determined to be acutely lethal, an aliquot of the failing sample shall be analyzed for the parameters outlined in Table 5 without delay.
59. If a sample is determined to be acutely lethal, Tacora shall collect from the final discharge point of the failing site a grab sample twice per month and conduct an ALT

in accordance with Section 6 of the Reference Method. Samples shall be collected twice per month, not less than seven days apart, and an ALT shall be conducted on each sample, until it is determined that the effluent is not acutely lethal for three consecutive tests. Following the third consecutive non-acutely lethal test, Tacora shall conduct ALTs as per the original prescribed frequency outlined in Table 3.

60. If effluent is determined to be acutely lethal for three consecutive ALTs, Tacora shall implement a Toxicity Identification Evaluation (TIE) to identify the toxin, and from this develop measures to prevent or reduce the toxin. The report, written as a result of these identification activities, shall be submitted to the Department for review, *within 60 days* of the third consecutive failed ALT result. After review of the report, the Department may place additional requirements upon the proponent for treatment of effluent prior to discharge.
61. All oil water separators shall be checked routinely to ensure they are working properly. A log of these checks shall be maintained by Tacora.
62. Reports submitted under Section 31 of MDMER as a result of a deposit out of the normal course of events shall be provided to the Department.

### Water Chemistry Analysis

63. Four times per calendar year and not less than 30 days apart, Tacora shall perform Water Quality Analysis as per Table 5. Analytical results shall be submitted as per the *Reporting* section.

Table 5: Water Chemistry Analysis Program		
EDMS Location Codes	Location	Parameters
00306	Tailings Line Emergency Dump Basin #1 (Settling Basin)	<b>General Parameters:</b> temperature, dissolved oxygen (DO), nitrate + nitrite, nitrate, nitrite, pH, TSS, colour, sodium, potassium, calcium, sulphide, magnesium, ammonia, alkalinity, sulphate, chloride, turbidity, reactive silica, orthophosphate, phosphorous, DOC, conductance, TDS (calculated), phenolics, carbonate (CaCO <sub>3</sub> ), hardness (CaCO <sub>3</sub> ), bicarbonate (CaCO <sub>3</sub> )
00307	East Pit 2 Dewatering (Sylvio Settling Basin)	
00308	West Pit Dewatering (Settling Basin)	
00309	Knoll Lake Discharge (Settling Basin)	
00310	Flora Lake Discharge	
00313	West Pit Deep Well	
00315	Jean River	
00316	Walsh River	
00317	Vivot Lake	

00318	Long Lake	manganese, molybdenum, mercury, nickel, selenium, silver, strontium, thallium, tin, titanium, uranium, vanadium, zinc
00319	Wabush Narrows	
00322	Flora Outlet Arm	

64. Tacora may discontinue testing for mercury if the mercury concentration in the effluent is less than 0.10 ug/L in 12 consecutive quarterly samples. Tacora shall notify the Department in writing, at least 30 days in advance of a reduction in the frequency of testing.

### Environmental Effects Monitoring

65. MDMER requires that Tacora conduct Environmental Effects Monitoring (EEM) as part of the mine's authority to deposit effluent under the Fisheries Act. Copies of all EEM study designs and reports shall be submitted to the Department.

### Ambient Air

66. Tacora shall operate an ambient air monitoring program as per the conditions in this Approval and its amendments. Approval shall be obtained from the Department prior to purchase, installation or relocation of any monitoring equipment.
67. Parameters to be monitored and their locations are outlined in Table 6.

Table 6 – Ambient Air Monitoring Program	
Site	Parameter
Station #1- Provincial Building	SO <sub>2</sub> , PM <sub>2.5</sub> , TPM
Station #2 – Smallwood Drive	PM <sub>2.5</sub> , TPM

68. Ambient air monitoring shall be done in accordance with the *Ambient Air Monitoring Guidance Document (GD-PPD-065)*, or its successors.
69. Information regarding calibrations, site visits and maintenance for all continuous ambient air monitors shall be recorded into the DR DAS electronic logbook. Specific information regarding non-continuous TPM monitors, including but not limited to slopes, intercepts, initial and final masses, times, flows, etc. shall be submitted electronically, as per the *Reporting* section.
70. The air quality standards specified in Schedule A of the *Air Pollution Control Regulations, 2022* shall apply to all points outside of Tacora's administrative boundary. The administrative boundary is defined as the area encompassed by the coordinates contained in Appendix A, a total area of approximately 41.988 km<sup>2</sup>. All coordinates are referenced to NAD83 UTM Zone 19.

## Annual Air Emissions Reporting

71. Tacora shall submit an annual Air Emission Report to the Department by *June 1* of the subsequent year. This report shall include:
- the estimated annual emissions of the following flue gas constituents: SO<sub>2</sub>, NO<sub>x</sub>, CO<sub>2</sub>, CO, TPM, and PM<sub>2.5</sub>; and
  - the actual calculations including factors, formulae and/or assumptions used.

## Point Source Inventory

72. By *June 30, 2023*, Tacora shall submit, to the Department for review, a list of stationary point source emitters (e.g. boilers, process heaters, dryers, incinerators, kilns, process vents, flares, etc.) in operation. Information to be included in the list shall be manufacturer, manufactured date, installation date, specifications of the outlet stack, associated pollution control equipment, fuel burned, and any other information which Tacora considers appropriate.

## Pollution Control Equipment

73. All pollution control equipment shall be maintained and operated in a manner that ensures optimum performance.
74. The Department reserves the right to require the installation of additional pollution control equipment by Tacora within a reasonable time frame, as necessary to bring Tacora into compliance with the *Air Pollution Control Regulations, 2022*.

## Source Emissions Testing and Dispersion Modelling

75. Source emissions testing shall be done in accordance with the *Source Emission Testing Guidance Document (GD-PPD-016.1)*. Dispersion Modelling shall be done in accordance with the *Plume Dispersion Modelling Guidance Document (GD-PPD-019.2)*. Determination of frequency of source emissions testing and dispersion modelling shall be done in accordance with the *Compliance Determination Guidance Document (GD-PPD-009.4)*.
76. Tacora shall be required to complete source emissions testing once every four years if it has been shown, via a registered dispersion model, that the operation is in compliance with section 3(2) and Schedule A of the *Air Pollution Control Regulations, 2022*. If it has been shown, via a registered dispersion model, that the operation is not in compliance with section 3(2) and Schedule A of the *Air Pollution Control Regulations, 2022*, then the facility shall complete source emissions testing every two years.
77. Source emissions testing results shall be submitted to the Department within *120 days* of completion of the sampling.
78. Plume dispersion modelling results shall be submitted to the Department within *120 days* of approval of the source emissions testing results by the Department.
79. If the results from the plume dispersion modelling indicate that Tacora is not in



compliance with section 3(2) and Schedule A of the *Air Pollution Control Regulations, 2022*, then Tacora shall submit to the Department, *within six months* from the date of submission of plume dispersion modelling results, an Action Plan to bring emissions of the parameters of concern into compliance. In addition to this, the Plan shall include information detailing the improvements to be implemented to the Scully Mine equipment and instruments, and a time frame for the improvements. By *December 31* of each year, a report shall be submitted to the Department outlining the progress made to date towards accomplishing the goals of the Plan.

### **Analysis and QA/QC**

80. Unless otherwise stated herein, all solids and liquids analysis performed pursuant to this Approval shall be done by either a contracted commercial laboratory or an in-house laboratory. Contracted commercial laboratories shall have a recognized form of accreditation. In-house laboratories have the option of either obtaining accreditation or submitting to an annual inspection by a representative of the Department, for which Tacora shall be billed for each laboratory inspection in accordance with Schedule 1 of the *Accredited Laboratory Policy (PD:PP2001-01.2)*. Recommendations of the Department stemming from an annual inspection shall be addressed within six months, otherwise further analytical results shall not be accepted by the Department.
81. The exact location of each sampling point shall remain consistent over the life of the monitoring programs, unless otherwise approved by the Department.
82. Tacora shall bear all expenses incurred in carrying out the environmental monitoring and analysis required under conditions of this Approval.

### **Monitoring Alteration**

83. The Department has the authority to alter monitoring programs or require additional testing at any time when:
  - pollutants might be released to the surrounding environment without being detected;
  - an adverse environmental effect may occur; or
  - it is no longer necessary to maintain the current frequency of sampling and/or the monitoring of parameters.
84. Tacora may, at any time, request that monitoring program or requirements of this Approval be altered by:
  - requesting the change in writing to the Department; and
  - providing sufficient justification, as determined by the Department.

The requirements of this Approval shall remain in effect until altered, in writing, by the Department.

## Reporting

85. Monthly reports containing the environmental compliance monitoring and sampling information required in this Approval shall be received by the Department in digital format within 30 calendar days of the reporting month. All related laboratory reports shall be submitted with the monthly report in Extensible Markup Language (XML) format and Adobe Portable Document Format (PDF). Digital report submissions shall be uploaded through the EDMS web portal.
86. Each monthly report shall include a summary of all environmental monitoring components and shall include an explanation for the omission of any requisite data. The monthly summary reports shall be in Microsoft Word or Adobe PDF and shall be uploaded through the EDMS web portal with the data submissions.
87. All incidents of:
- *Contingency Plan* implementation; or
  - non-conformance of any condition within this Approval; or
  - a spill or leak of any amount of a regulated substance; or
  - effluent discharge criteria being, or suspected of being, exceeded; or
  - verbal or written complaints of an environmental nature received from the public by Tacora and related to the Scully Mine, including complaints submitted anonymously;

shall be immediately reported, within one working day, to the Department.

A written comprehensive incident report, including a detailed description of the incident, a summary of contributing factors, and an Action Plan to prevent future incidents of a similar nature, shall be prepared. The report shall include a description of actions already taken and future actions to be implemented, and shall be submitted to the Department within 30 days of the date of the initial incident.

88. Any:
- spill of gasoline or associated product in excess of 70 litres from a storage tank system, pipeline, or vehicle, or
  - leak of gasoline or associated product in any amount from a storage tank system, pipeline, tank car or tank vehicle, or
  - spill of used oil or used glycol in excess of 70 litres from a storage tank system, or
  - leak of used oil or used glycol in any amount from a storage tank system;

shall be reported immediately through the Environmental Emergencies 24-hour report line at 1-800-563-9089.

## Liaison Committee

89. The Department recognizes the benefits, and at times the necessity, of accurate, unbiased communication between the public and industrial operations which have an impact on the properties and residents in the area. The Department encourages the formation and regular meeting of a Liaison Committee comprised of representatives of Tacora, the Department and independent members of the general population of

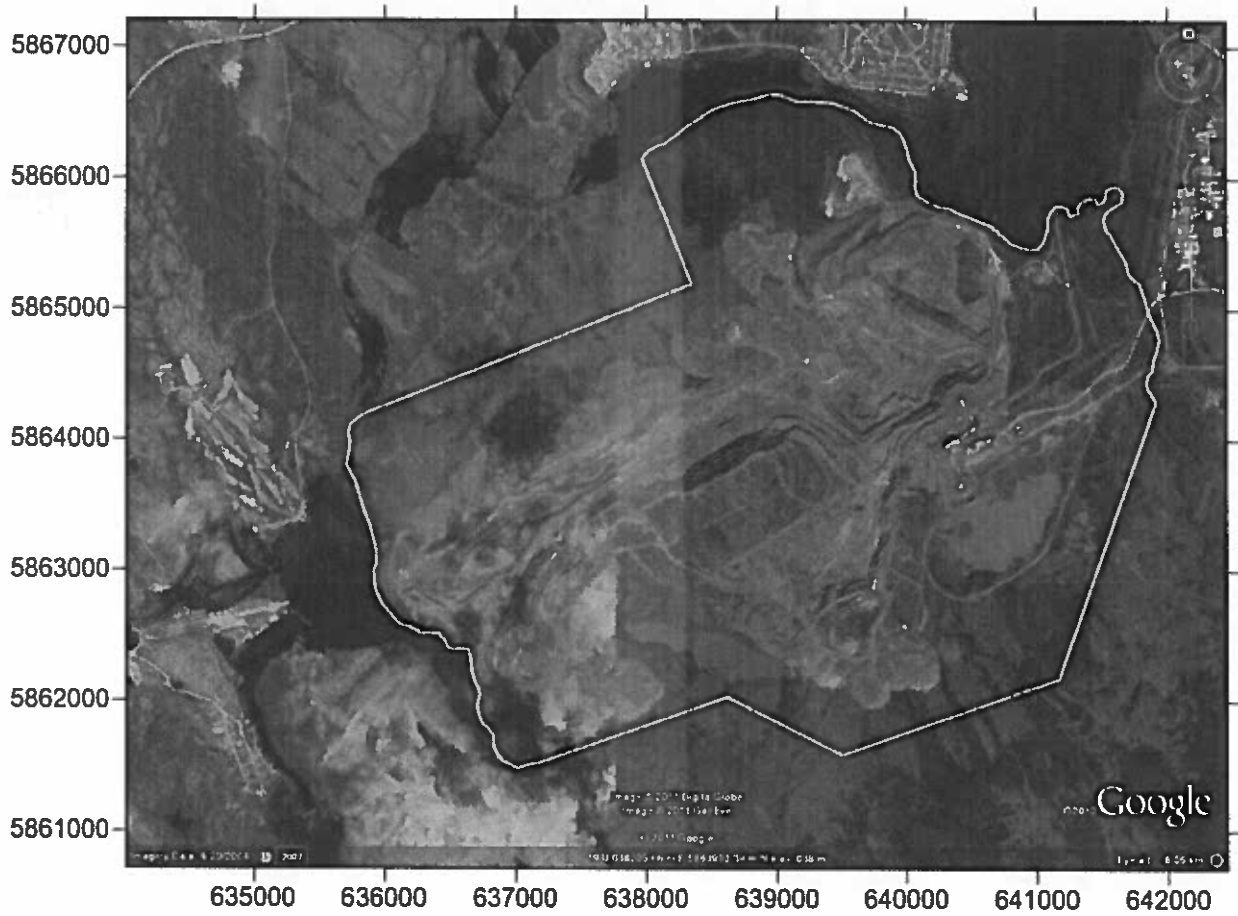
Labrador City and Wabush. Regular meetings of the Liaison Committee will provide a clear conduit of communication between concerned citizens and Tacora. The Department reserves the right to require the formation of a Liaison Committee should it is deemed necessary.

### **Expiration**

90. This Certificate of Approval expires *March 27, 2028*.
91. Should the proponent wish to continue to operate the Scully Mine beyond this expiry date, a written request shall be submitted to the Department for the renewal of this Approval. Such request shall be made prior to *August 27, 2027*.

## APPENDIX A

### West Administrative Boundary Graphic and Coordinates (Mine Site: 21.408 km<sup>2</sup>)



Note: The graphic is provided as an approximate illustration of the administrative boundary and is not intended for compliance determination.

<b>Coordinates (Mine Site)*</b>			
<b>Easting</b>	<b>Northing</b>	<b>Easting</b>	<b>Northing</b>
Starting at coordinates		Continued	
641067.983	5865555.607	636233.259	5862543.175
641079.554	5865597.132	636179.974	5862568.799
641089.14	5865637.487	636122.532	5862584.045
641086.713	5865697.528	636078.362	5862620.458
641107.402	5865749.34	636032.528	5862676.794
641146.501	5865792.784	635982.705	5862732.795
641186.77	5865796.188	635947.15	5862810.047
641238.347	5865780.999	635922.393	5862878.175
641249.602	5865741.254	635915.37	5862997.928
641272.339	5865722.995	635937.26	5863059.933

641321.401	5865747.808	635933.901	5863159.942
641318.213	5865787.79	635908.47	5863248.065
641349.948	5865829.907	635878.373	5863355.87
641401.025	5865854.78	635845.812	5863433.363
641454.359	5865848.551	635813.73	5863541.002
641477.011	5865810.253	635793.947	5863609.537
641516.02	5865833.66	635772.333	5863687.961
641532.292	5865875.325	635740.444	5863745.459
641533.135	5865915.425	635706.717	5863812.835
641574.16	5865938.892	635722.954	5863894.416
641621.789	5865943.629	635733.369	5863985.551
641662.213	5865895.835	635720.564	5864054.683
641652.841	5865825.429	635736.469	5864116.185
641615.849	5865802.08	635799.026	5864171.574
641557.671	5865766.977	635863.246	5864207.042
641524.971	5865734.849	635882.334	5864218.666
641512.354	5865683.272	635895.279	5864219.753
641535.887	5865614.945	638346.521	5865194.407
641564.59	5865576.825	637967.206	5866148.379
641602.21	5865510.024	638019.971	5866212.971
641646.846	5865433.411	638082.203	5866248.279
641682.451	5865366.551	638137.142	5866262.909
641705.903	5865278.184	638231.732	5866331.004
641741.973	5865241.395	638313.369	5866398.007
641784.094	5865204.784	638422.891	5866467.369
641808.977	5865136.497	638509.352	5866524.762
641830.205	5865078.121	638580.387	5866550.768
641851.643	5864989.695	638667.351	5866578.112
641886.906	5864911.694	638757.151	5866595.665
641923.483	5864834.845	638850.924	5866613.546
641935.594	5864766.183	638935.913	5866640.727
641918.185	5864694.426	639023.389	5866638.026
641894.052	5864622.472	639152.884	5866588.705
641885.677	5864540.963	639266.257	5866588.179
641855.66	5864508.911	639339.796	5866584.314
641835.559	5864437.076	639421.302	5866581.102
641855.856	5864387.578	639493.521	5866557.074
641888.864	5864340.681	639542.999	5866541.161
641910.474	5864292.335	639604.261	5866516.206
641168.625	5862175.109	639654.399	5866480.299
639500	5861589.628	639714.342	5866435.169
638616.526	5862032.658	639772.787	5866420.009
637182.636	5861529.541	639835.206	5866405.175
637089.848	5861511.747	639898.624	5866390.438
637008.857	5861484.906	639946.78	5866354.354
636957.558	5861510.702	639978.837	5866306.894
636895.464	5861545.61	639992.131	5866267.895

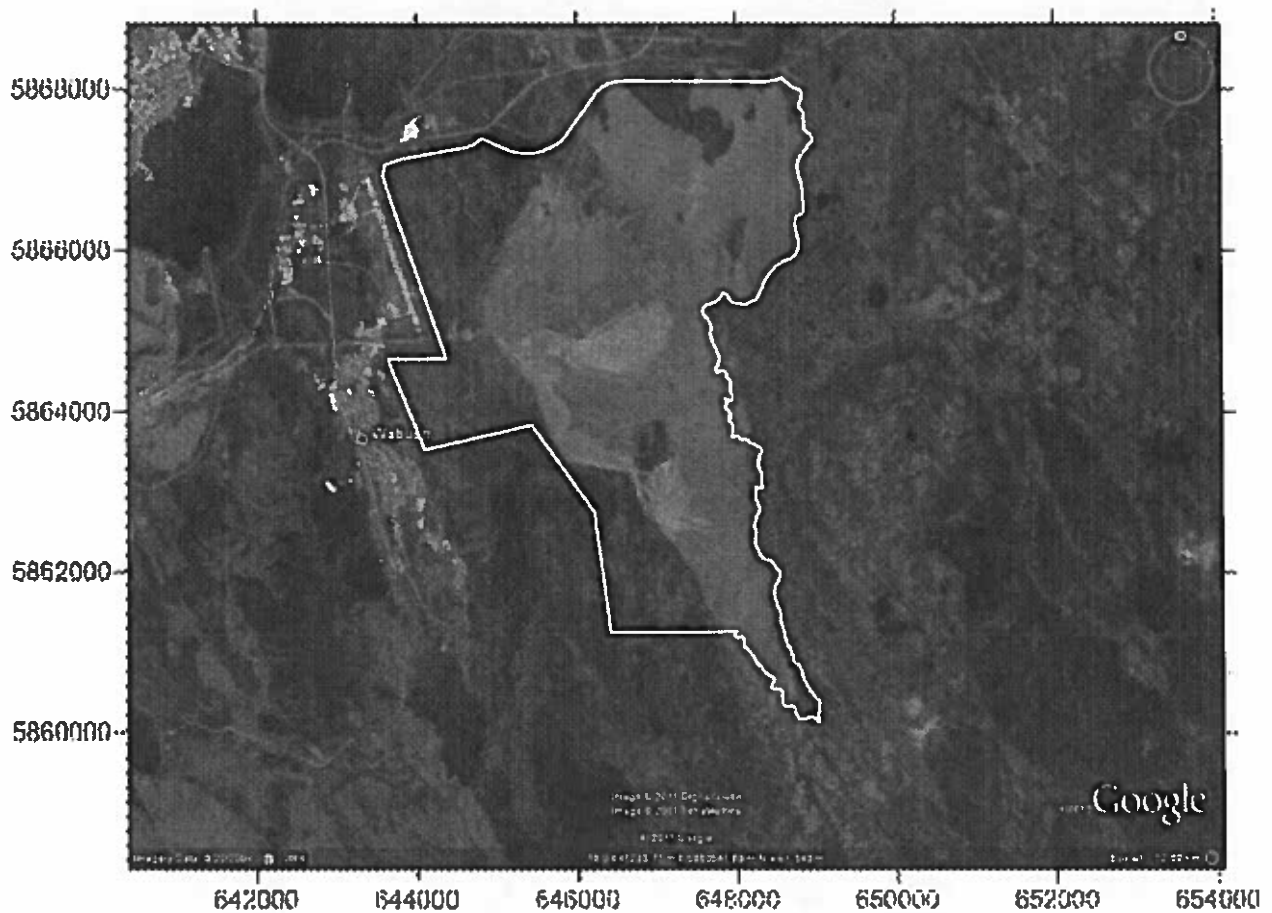
636849.63	5861601.95	640007.418	5866229.055
636826.538	5861650.152	640025.046	5866150.297
636822.528	5861709.991	640069.407	5866063.755
636819.032	5861739.791	640076.078	5865984.078
636776.178	5861796.372	640069.62	5865953.445
636734.011	5861832.959	640081.436	5865884.237
636709.253	5861901.083	640114.811	5865856.942
636697.432	5861970.298	640186.707	5865812.822
636719.645	5862052.385	640245.983	5865787.694
636701.693	5862111.051	640335.292	5865775.129
636673.787	5862168.891	640401.377	5865740.55
636655.323	5862257.597	640488.378	5865707.716
636649.488	5862327.314	640569.399	5865674.386
636633.693	5862396.194	640654.402	5865641.385
636568.121	5862400.729	640699.563	5865605.065
636515.344	5862396.311	640758.357	5865549.807
636477.819	5862413.228	640816.317	5865504.521
636453.732	5862461.358	640888.528	5865480.491
636403.917	5862517.356	640948.957	5865465.49
636359.093	5862513.597	641011.708	5865470.741
636343.323	5862522.302	641049.201	5865514.003
636327.386	5862520.973	641067.983	5865555.607
636277.599	5862516.797		

End of 351 points

Continued

\* Where the coordinates are NAD 83, UTM zone 19

East Administrative Boundary Graphic and Coordinates (Tailings Site: 20.580 km<sup>2</sup>)



Note: The graphic is provided as an approximate illustration of the administrative boundary and is not intended for compliance determination.

East Administrative Boundary Coordinates (Tailings Site)

<b>Coordinates (Tailings Site)*</b>			
<b>Easting</b>	<b>Northing</b>	<b>Easting</b>	<b>Northing</b>
Starting at coordinate		Continued	
644106.779	5863531.79	647948.075	5863682.504
643648.112	5864656.969	647981.222	5863699.105
644374.698	5864661.317	647993.931	5863701.721
643586.939	5866928.844	648008.155	5863698.817
643611.428	5867066.18	648047.008	5863661.045
643832.727	5867139.272	648067.957	5863658.348
643967.167	5867164.433	648098.014	5863665.949
644628.826	5867282.188	648112.17	5863665.27
644729.931	5867319.73	648163.265	5863623.421

644825.867	5867394.967	648204.263	5863603.528
645112.943	5867264.446	648287.103	5863558.203
645219.682	5867226.47	648298.307	5863544.075
645391.136	5867206.032	648303.663	5863523.088
645561.989	5867227.883	648303.776	5863497.487
645710.026	5867292.465	648278.003	5863459.96
645797.717	5867350.776	648273.91	5863439.796
645857.856	5867408.254	648273.019	5863403.032
646259.855	5867969.24	648263.785	5863374.918
646319.343	5868025.592	648261.812	5863351.48
646412.692	5868074.067	648266.062	5863322.667
646520.892	5868098.505	648301.065	5863256.948
646640.986	5868107.722	648309.317	5863229.371
648375.731	5868095.108	648305.699	5863127.956
648526.251	5868120.893	648316.823	5863072.637
648579.177	5868149.242	648316.024	5863054.801
648583.688	5868133.795	648308.022	5863052.328
648685.799	5868050.11	648277.688	5863053.624
648728.347	5868022.478	648259.723	5863068.657
648801.267	5867991.331	648244.186	5863070.407
648824.66	5867974.241	648239.717	5863062.477
648829.741	5867962.152	648233.776	5863036.691
648808.711	5867859.085	648239.074	5862995.664
648788.877	5867826.189	648233.041	5862950.95
648784.325	5867799.331	648238.944	5862912.168
648789.783	5867775.008	648276.216	5862816.462
648843.34	5867717.659	648280.228	5862795.434
648851.918	5867701.225	648272.781	5862752.903
648835.321	5867650.617	648246.296	5862716.467
648857.317	5867613.446	648239.273	5862704.006
648861.83	5867598	648235.291	5862658.242
648849.264	5867547.517	648209.829	5862588.441
648854.016	5867524.285	648231.885	5862527.89
648864.247	5867497.883	648237.277	5862505.791
648922.271	5867448.466	648224.921	5862381.845
648939.825	5867424.516	648226.778	5862365.203
648964.08	5867379.623	648238.837	5862323.271
648955.119	5867364.874	648257.794	5862275.984
648933.96	5867353.088	648282.133	5862228.863
648922.016	5867326.001	648306.097	5862193.975
648897.065	5867306.306	648336.949	5862175.997
648889.085	5867281.568	648413.281	5862146.058
648893.857	5867279.489	648455.112	5862099.475
648882.88	5867264.678	648493.956	5862040.555
648881.673	5867260.188	648514.719	5862022.268
648859.135	5867249.473	648528.047	5862004.866
648846.038	5867237.937	648526.963	5861952.511



648838.297	5867205.414	648514.671	5861914.284
648808.175	5867178.88	648460.223	5861823.553
648769.015	5867096.406	648454.19	5861778.838
648763.79	5867069.527	648453.344	5861718.698
648777.061	5866966.406	648471.13	5861665.81
648784.879	5866931.023	648487.138	5861605.075
648810.938	5866849.448	648498.791	5861576.489
648834.202	5866727.709	648522.759	5861541.603
648835.869	5866695.477	648528.3	5861492.791
648831.124	5866653.027	648535.301	5861484.101
648840.919	5866575.403	648532.119	5861456.172
648845.269	5866499.837	648523.258	5861415.824
648831.066	5866480.474	648542.152	5861370.763
648806.953	5866455.239	648574.935	5861268.241
648767.107	5866438.425	648582.267	5861205.012
648750.888	5866419	648622.156	5861090.464
648740.731	5866377.497	648653.096	5861048
648737.672	5866323.968	648663.975	5861022.73
648744.934	5866262.964	648662.173	5860993.731
648749.79	5866236.396	648665.914	5860981.601
648772.923	5866162.522	648697.857	5860950.3
648782.67	5866108.274	648701.028	5860934.812
648784.302	5866077.154	648679.702	5860927.477
648776.97	5866031.285	648683.1	5860926.468
648753.108	5865976.001	648681.96	5860919.754
648729.836	5865945.226	648706.879	5860875.991
648699.773	5865916.469	648747.16	5860858.306
648596.044	5865876.537	648765.841	5860842.183
648494.981	5865815.538	648795.016	5860769.608
648417.021	5865725.195	648815.285	5860680.061
648341.929	5865607.11	648845.019	5860633.108
648323.21	5865537.514	648855.707	5860592.247
648289.188	5865484.147	648886.308	5860560.906
648257.729	5865413.047	648893.221	5860533.289
648240.125	5865394.695	648927.895	5860500.96
648186.254	5865374.116	648970.293	5860436.586
648132.017	5865343.507	649010.18	5860409.985
648105.264	5865338.233	649019.01	5860385.766
648055.244	5865345.604	649010.128	5860324.265
648001.966	5865349.536	649018.023	5860286.659
647953.018	5865365.847	648996.719	5860234.794
647932.237	5865385.248	648996.698	5860213.642
647873.315	5865463.594	649014.233	5860147.389
647854.05	5865477.476	649012.317	5860143.99
647839.899	5865478.156	648972.77	5860159.47
647819.069	5865455.253	648950.948	5860189.968
647800.026	5865417.934	648933.006	5860203.887

647731.109	5865361.276	648901.946	5860206.27
647643.827	5865333.001	648868.709	5860191.887
647595.033	5865300.338	648834.125	5860177.464
647579.213	5865267.571	648801.253	5860173.112
647582.012	5865242.053	648766.087	5860177.596
647607.276	5865186.051	648748.179	5860190.404
647641.203	5865154.806	648736.887	5860229.019
647647.696	5865140.532	648709.649	5860260.465
647663.941	5865115.425	648705.828	5860297.083
647688.738	5865052.73	648701.141	5860318.09
647692.176	5865028.345	648687.134	5860335.471
647681.964	5865010.221	648664.015	5860342.553
647668.152	5864999.779	648607.224	5860327.448
647665.131	5864988.554	648557.678	5860361.548
647717.765	5864829.861	648549.227	5860373.534
647751.1	5864774.107	648555.068	5860402.657
647755.917	5864748.651	648546.835	5860451.386
647783.27	5864690.487	648551.169	5860463.764
647788.998	5864657.266	648549.973	5860502.69
647770.726	5864616.631	648531.851	5860544.436
647763.21	5864576.325	648516.101	5860552.858
647743.252	5864546.77	648479.832	5860549.517
647744.171	5864516.741	648450.794	5860551.965
647757.729	5864491.552	648430.299	5860561.355
647767.176	5864490.728	648408.892	5860578.509
647796.718	5864515.01	648405.186	5860589.527
647827.111	5864511.488	648427.987	5860614.718
647850.882	5864504.423	648442.804	5860658.589
647864.908	5864485.928	648449.329	5860665.468
647875.148	5864437.26	648454.131	5860684.541
647916.079	5864397.325	648411.899	5860699.942
647925.102	5864366.431	648391.029	5860721.566
647914.073	5864287.054	648344.18	5860755.751
647916.27	5864259.291	648310.858	5860788.125
647938.316	5864198.739	648269.954	5860848.097
647939.67	5864176.516	648248.72	5860859.691
647933.764	5864149.618	648236.906	5860871.574
647917.226	5864140.206	648212.893	5860929.838
647895.708	5864139.546	648123.188	5861043.976
647872.165	5864161.09	648078.226	5861082.674
647863.253	5864166.383	648083.216	5861139.601
647877.8	5864108.941	648065.33	5861195.827
647867.289	5864078.562	648045.98	5861211.932
647864.71	5864052.879	648026.911	5861196.876
647874.167	5864029.791	648008.915	5861190.759
647929.334	5863964.688	647989.267	5861194.61
647931.998	5863943.618	647965.173	5861211.684

647922.823	5863935.545	647966.042	5861227.296
647897.27	5863934.762	647989.779	5861265.872
647895.865	5863914.681	647991.033	5861270.855
647906.906	5863883.849	647544.18	5861257.191
647945.254	5863840.495	646410.498	5861259.799
647951.333	5863773.888	646213.462	5862753.842
647933.169	5863707.651	645435.535	5863837.855
647937.179	5863686.623	644106.779	5863531.79

Continued

End

\* Where the coordinates are NAD 83, UTM zone 19

cc: Ms. Julie Robbins  
Environment and Climate Change Canada  
4 Herald Ave., 5th Floor, Suite 503  
Corner Brook, NL  
A2H 4B4

Mr. Chris Parsons - Manager of Operations and Environmental Protection  
Digital Government and Service NL  
149 Smallwood Drive  
Mount Pearl, NL  
A1B 4J6

Mr. Keith Bradbury – Director  
Mineral Development Division  
Department of Natural Resources  
P.O. Box 8700  
St. John's, NL  
A1B 4J6

Charlie Perry - Manager  
Town of Wabush, NL  
P.O. Box 19015  
Whiteway Drive  
A0R 1B0