

PERMIT FOR DEVELOPMENT

Pursuant to the *Water Resources Act*, SNL 2002 cW-4.01, specifically Section(s) 39

Date: **JANUARY 30, 2019**

File No: 550-01-02-05-075
Permit No: PRO10093-2019

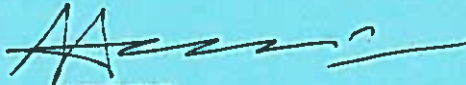
Permit Holder: **Beaver Brook Antimony Mine Inc.**
PO Box 160
Glenwood NL A0G 2K0
email: aburt@bbamnl.com

Attention: **Amanda Burt**

Re: **Gander Lake WSMC - Gander Lake PPWSA - Resumption of Operations - Beaver Brook Antimony Mine Inc.**

Permission is hereby given for : **resumption of mining and milling operations at the Beaver Brook Antimony Mine, in the Gander Lake Protected Public Water Supply (used by the Towns of Appleton, Gander and Glenwood) with reference to application dated November 13, 2018.**

- This Permit does not release the Permit Holder from the obligation to obtain appropriate approvals from other concerned municipal, provincial and federal agencies.
- The Permit Holder must obtain the approval of the Crown Lands Administration Division if the project is being carried out on Crown Land.
- This Permit is subject to the terms and conditions indicated in Appendices A and B (attached).
- It should be noted that prior to any significant changes in the design or installation of the proposed works, or in event of changes in ownership or management of the project, an amendment to this Permit must be obtained from the Department of Municipal Affairs and Environment under Section 49 of the *Water Resources Act*.



MINISTER

APPENDIX A
Terms and Conditions for Permit

PPWSA General

1. All operations must be carried out in a manner that prevents damage to land, vegetation, and watercourses, and which prevents pollution of bodies of water.
2. Any areas adversely affected by this project must 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 considered necessary in the opinion of this Department.
3. All persons working on this project must be informed that they are within a Protected Public Water Supply Area, and must be made aware of all conditions of this Permit. A copy of this Permit must be on site during operations.
4. The attached Completion Report (Appendix C) for Permit No. 10093 must be completed and returned to this Department upon completion of the approved works. Pictures must be submitted along with the completion report, showing the project site prior to and after development.
5. An undisturbed (no vegetation cutting or ground disturbance) buffer zone of at least **100 metres** shall be maintained along both sides of the Northwest Gander River, at least **50 metres** along both sides of all streams and main tributaries running into the Northwest Gander River, and at least **30 metres** around all ponds and along both sides of all other water bodies including wetlands. Activity or development within these buffer zones is prohibited. All buffer zones must be marked with signs or flagging tape to avoid encroachment into the buffer zones.
6. All maintenance other than emergency repairs must be carried out within the existing maintenance facilities. No new equipment storage or maintenance facilities associated with this project, will be permitted within the Protected Public Water Supply Area.
7. All waste material is to be collected in appropriate refuse containers, and disposed of at an approved waste management or transfer facility outside the Protected Public Water Supply Area in accordance with the *Environmental Protection Act, SNL 2002 cE-14.2*. The closest site Central Newfoundland Waste Management facility at Norris Arm. Under no circumstance will waste material be buried or disposed of on site.
8. Any activity within a freshwater body (including wetlands and flood risk areas), requires a Permit under Section 48 of the Water Resources Act, 2002. This Permit refers to Section 39 of the Water Resources Act, 2002 and does not grant permission for the above stated work including fording and/or culvert or bridge installation.
9. The Department reserves the right to require that the Permit Holder follow, and cover all costs incurred by the Permit Holder or this department, associated with any water quality monitoring program that may be ordered by the Minister for the purpose of ensuring that the water quality is maintained within acceptable guidelines.
10. Officials of the Department and the appropriate Municipal Authority, Operator, or Watershed Management Committee may visit the site to ensure compliance with this Permit.
11. Liaison is to be maintained with the appropriate Municipal Authority and Environmental Scientist. If there are any specific problems (ie sedimentation, fuel spill, other potential water quality impairment), the appropriate Town Manager/Clerk, Mayor, Chair of the Local Service District Committee, or Chair of the Water Supply Committee must be notified immediately at (709)651-5915. The Environmental Scientist must also be notified immediately at (709)292-4280.
12. Treated wood shall not be used in a water body or within 30 meters of the high water mark of any water body. The use of creosote or pentachlorophenol (PCP or Pentox) treated wood anywhere within the Protected Public Water Supply Area is strictly prohibited.
13. The Permit Holder must inspect the site daily, and any water quality impairment related problems are to be reported immediately to the Environmental Scientist at 292-4280 and the appropriate Municipal Authority or Watershed Monitoring Committee at (709)651-5915.

14. The location of the work is highlighted on the Location Map for this Permit attached as Appendix D.
15. This Permit is valid for five (5) years from the date of issue. If required, an application for Permit renewal must be submitted prior to the expiry date.
16. Any changes in water quality resulting directly from this project, rendering the water unsuitable as a public water supply, are the responsibility of the Permit Holder. The Minister may order the Permit Holder to provide an alternate source of potable water to the affected community until water quality returns to an accepted level.
17. All vehicles and equipment must be in good working order with no leaking fuel, oil, or other harmful substances that could impair water quality.
18. All stationary motorized equipment and fuel tanks shall have metal trays, absorbent pads, berms or impervious liners under them to catch any leaking or spilled fuel or oil. Secondary containment must have a capacity of at least 110% of the total volume of fuel and oil.
19. Drainage from roads and other disturbed areas into any body of water must first be discharged into a settling pond, a vegetated area or pass through a sedimentation fence where all suspended material can settle out before draining into any body of water.
20. Any streams not visible on a 1:50,000 scale map (including field identified streams) shall require a minimum buffer of 30 m.

Fuel Storage

21. Fuel storage shall be limited to a maximum of six (6) existing tanks as detailed below. Every precaution shall be made to prevent spills, leaks, or other discharges from these tanks during refueling by fuel suppliers and refueling of equipment. Apart from the mobile Slip Tank, storage sites shall be located only as detailed on 'Appendix A Site Plan 2012'.
 - Tank 1, GA-GAP04-120062.01, s/n 330C, 13500 litres - Diesel.
 - Tank 2, GA-GAP0412-0167, s/n 495027, 9080 litres - Diesel.
 - Tank 3, CB-GAP0412-0177.3, 13500 litres - Gasoline.
 - Tank 4, GA-U0C08-07001, s/n 2079 - 6819 litres - Used Oil.
 - Tank 5, Steel Slip Tank, s/n 0888, 200 litres - Diesel, Mobile.
 - Tank 6, Generator Set, 800 litres (Single Wall) - Diesel.
22. Fuel Tanks 1, 3, 4 and 6 are not located within a secondary containment berm. Therefore, within 30 days of the issuance of this permit, Beaver Brook Antimony Mine Inc. shall propose in writing, with details and specifications, how they propose to facilitate secondary containment around these tanks, such that there is 110% of the total volume of the tank or tanks situate within the proposed secondary containment. Once this proposal is received and approved secondary containment must be in place around these tanks by September 30, 2019, and remain in place until the end of the project when the tanks are removed.
23. Within 30 days of the issuance of this permit, Beaver Brook Antimony Mine Inc. shall propose in writing, with details and specifications, a means of containment to catch and contain any spilled or leaked fuel adjacent to and outside the aforementioned berm or means of secondary containment, for Tanks 1, 2, 3 and 4 during the refueling tanks by fuel suppliers and refueling of equipment. This shall include areas underneath and adjacent to all pumps, hoses and nozzles, and the vehicles which are delivering fuel and those being refueled. Once this proposal is received and approved this means of containment must be in place by September 30, 2019, and remain in place until the end of the project when the tanks are removed.
24. A complete oil spill clean-up kit must be on site at all times when gasoline or fuel powered equipment is being used or refueled. As a minimum, the kit must contain the following:
 - Fire pump and 100 metres of hose
 - Two hand operated fuel pumps
 - Six recovery containers such as empty 205 litre drums
 - Four shovels
 - Two pick axes
 - Ten metres of containment boom
 - Twenty-five absorbent pads
 - One hundred litres of loose absorbent material
25. Any spills of gasoline, fuel or oil, regardless of volume, shall be reported immediately to the Environmental Scientist and the appropriate Municipal Authority or Watershed Management Committee by calling 292-4280 and (709) 651-5915 respectively. Furthermore, all spills in excess of 70 litres shall be reported immediately to the 24 hour spill report line at 1-800-563-9089.

26. Contaminated snow and soil must be removed from the site and disposed of at an approved location outside the protected public water supply area, in accordance with the *Environmental Protection Act, SNL 2002 cE-14.2*.

Protected Miscellaneous

27. The Permit Holder is required to ensure that adequate sanitary (bathroom) facilities are available or provided on site. This may be in the form of a portable toilet, chemical toilet, pit privy (outhouse), sub-surface disposal system, or municipal sewer system. If a portable toilet or chemical toilet is used, the waste water must be disposed of in a septic disposal system approved by Service NL, or at an approved waste disposal site, outside the Protected Public Water Supply Area in accordance with the Environmental Protection Act, SNL 2002 cE-14.2. If a pit privy (outhouse) or sub-surface disposal system is used, it must be located outside the required buffers, and be subject to Service NL standards, requirements and approval.
28. The Permit Holder is required to provide this Department with all documentation, information and data which may be requested or required in order to carry out the inspection or investigation.
29. In addition to the Terms and Conditions of this Permit, The Permit Holder is required to abide by the Terms and Conditions of Certificate of Approval AA18-035647 issued by the Pollution Prevention Division of the Department of Municipal Affairs and Environment, any Permits or Authorizations issued by the Department of Natural Resources, and any other permits, certificates or amendments that may be subsequently issued. In the case of similar Terms and Conditions, the more stringent of the two shall prevail. In the case of conflicting conditions, the Permit Holder should seek clarification from the respective Departments.
30. Notwithstanding Condition 9 above, at this time, the Permit Holder is not required to undertake any additional water quality monitoring program other than the Effluent Monitoring and Discharge Program required under Certificate of Approval AA18-035647 issued by the Pollution Prevention Division of the Department of Municipal Affairs and Environment. In addition to the reporting requirements under Certificate of Approval AA18-035647, the regional Environmental Scientist shall be notified of any and all exceedances, by immediately by calling 709-292-4280, and subsequently providing copies of all related reports.

APPENDIX B
Special Terms and Conditions for Permit

1. The Permit Holder and its agent(s), subcontractor(s), and consultant(s) shall keep all systems and works in good condition and repair and in accordance with all laws, by-laws, directions, rules and regulations of any governmental authority. The Permit Holder or its agent(s), subcontractor(s), or consultant(s) shall immediately notify the Minister if any problem arises which may threaten the structural stability of the systems and works, endanger public safety and/or the environment or adversely affect others and/or any body of water either in or outside the said Project areas. The Permit Holder and its agent(s), subcontractor(s), and consultant(s) shall be responsible for all damages suffered by the Minister and Government resulting from any defect in the systems and works, operational deficiencies/inadequacies, or structural failure.
2. The Permit Holder and its agent(s), subcontractor(s), and consultant(s) shall operate the said Project and its systems and works in a manner which does not cause any water related and/or environmental problems, including but not limited to problems of erosion, deposition, flooding, and deterioration of water quality and groundwater depletion, in or outside the said Project areas. The Permit Holder and its agent(s), subcontractor(s), and consultant(s) shall be responsible for any and all damages associated with these problems caused as a result of changes, deficiencies, and inadequacies in the operational procedures by the Permit Holder or its agent(s), subcontractor(s), or consultant(s).
3. If the Permit Holder or its agent(s), subcontractor(s), or consultant(s) fails to perform, fulfil, or observe any of the terms and conditions, or provisions of this Permit, as determined by this Department, the Minister may, without notice, amend, modify, suspend or cancel this Permit in accordance with the *Water Resources Act*.
4. The Permit Holder and its agent(s), subcontractor(s), and consultant(s) indemnify and hold the Minister and Government harmless against any and all liabilities, losses, claims, demands, damages or expenses including legal expenses of any nature whatsoever whether arising in tort, contract, statute, trust or otherwise resulting directly or indirectly from granting this Permit, systems and works in or outside the said Project areas, or any act or omission of the Permit Holder or its agent(s), subcontractor(s), or consultant(s) in or outside the said Project areas, or arising out of a breach or non-performance of any of the terms and conditions, or provisions of this Permit by the Permit Holder or its agent(s), subcontractor(s), or consultant(s).
5. This Permit is subject to all provisions of the *Water Resources Act* and any regulations in effect either at the date of this Permit or hereafter made pursuant thereto or any other relevant legislation enacted by the Province of Newfoundland and Labrador in the future.
6. This Permit shall be construed and interpreted in accordance with the laws of the Province of Newfoundland and Labrador.

- cc: Amir Ali Khan, Ph.D., P.Eng.
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Appendix C - Completion Report

Pursuant to the *Water Resources Act*, SNL 2002 cW-4.01, specifically Section(s) 39

Date: **JANUARY 30, 2019**

File No: 550-01-02-05-075
Permit No: PRO10093-2019

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I (the Permit Holder named above or agent authorized to represent the Permit Holder) do hereby certify that the project described above was completed in accordance with the plans and specifications submitted to the Department of Municipal Affairs and Environment and that the work was carried out in strict compliance with the terms and conditions of the Permit issued for this project.

Date: _____ Signature: _____

This completion report must be completed and forwarded to the following address upon completion of the approved work.

Department of Municipal Affairs and Environment
Water Resources Management Division
PO Box 8700
St. John's NL A1B 4J6

APPENDIX D
Location Map for Permit

