



95 Wellington Street
Suite 1010
Toronto, Ontario
M5J 2N7
416-628-0216

November 2, 2017

Ms. Eva Paul
Water Resource Officer
Indigenous and Northern Affairs Canada
PO Box 1500, 4923-52 St
Yellowknife, NWT
X1A 2R3

Re: TMAC Response to INAC Inspection Report October 10-11, 2017

Dear Ms. Paul,

TMAC Resources Inc. (TMAC) is providing this letter in response to action items identified in the Inspection Report provided by Indigenous and Northern Affairs Canada (INAC) on October 10-11, 2017. Action items and TMAC response are detailed below:

- A. Please ensure that usage of the fuel farm berms is consistent with CCME Code of Practice as per Part D item 11a of the Type A Water Licence 2AM-DOH1323.

TMAC Response: Products that had been stored in the Roberts Bay tank farm will be relocated to the single-5 million L tank farm berm for temporary storage. Before the 5 million L tank is placed back into fuel storage service a separate lined berm area will be constructed for the purpose of storing totes and drums of new hydrocarbon products to be used at site and waste products destined for backhaul. Images provided below for more detail.

- B. The Waste rock pile is to be wholly contained within the diversion berm, and all runoff from Pad T must report as intended to the Pollution Control Pond.

TMAC Response: The plan has been developed to re-establish a clear division between the Diversion berm and the waste rock/ore storage piles. Excavators will be used to pull this material away from the Diversion berm and reposition it within the appropriate stockpile. The barrier berm at the boundary of the waste rock pile will be re-established to prevent material from migrating towards the Diversion berm. Signage will be posted along this boundary to alert operators that no material is to extend beyond that point. This work will be completed by the end of November. Weekly inspections of this area will be conducted to ensure that this boundary remains in place and that no material encroaches onto the Diversion berm.

- C. Hazardous waste is to be handled and stored in a manner that prevents any further contamination and is consistent with the HWMP. Removal from site in a timely fashion is required.

TMAC Response: The contents of the open totes of contaminated oil/hazardous waste will be transferred to containers that will be sealed as per TMAC's Hazardous Waste Management Plan (HWMP). The open totes have been relocated to a lined Quonset building in Roberts Bay to allow Waste Management personnel to transfer this material to appropriate containers which will be securely closed.

TMAC will backhaul hazardous waste in 2018. Waste will be packaged, labelled and transported offsite as per the HWMP. TMAC will utilize aircraft backhauls to transport material to Yellowknife where it will be disposed of with a registered waste disposal facility.

- D. Implementation of the Landfarm Management Plan should be undertaken in 2018

TMAC Response: Staff will be assigned to actively manage the Doris landfarm in accordance with the Landfarm Management Plan prior to the backhaul of material from the Boston site. Material within the landfarm will be managed as per this plan as revised in the future.

- E. Please provide an alternate plan to demonstrate that the equipment used to manage detoxified tailings is not used for any purpose that may contaminate non-contact materials or areas.

TMAC Response: A road has been constructed from the mill pad directly to the portal for the purpose of transporting detoxified tailings to the underground workings. Underground haul trucks carrying detoxified tailings will use this road to travel from the detoxified tailings collection pad on the south side of the mill to the portal. This route will ensure that this material does not leave the pollution control management area. Images of the completed roadway are provided below.

A surface 980 front-end loader has been dedicated to the task of loading detoxified tailings into the underground haul trucks. Due to limited space on the south side of the mill, this loader is parked at the equipment line-up located south-west of the mill pad when not in use. This parking location is within the pollution control management area and runoff from this area reports to the Sedimentation Pond. Heavy equipment operators and supervisors are aware that this piece of equipment cannot be used for any other purpose on site.

Note: The backhoe excavator pictured in the inspection report is not used for loading detoxified tailings. This excavator is positioned in this location to feed the primary crusher of the mill and move material within the coarse ore stockpile below the primary crusher located within the reclaim shed.

Should you have any further questions please feel free to contact me at john.roberts@tmacresources.com.

Sincerely,



John Roberts

Vice President, Environmental Affairs TMAC Resources Inc.

Cc: Dan Gagnon, TMAC Resources
NWB Licencing Department (via email)



Action Item A: Relocation of stored materials from the Roberts Bay tank farm to the single-5 ML tank farm has begun.



Action Item B: Open totes of contaminated oil/hazardous waste have been removed from single-5 ML tank farm berm.



Action Item E: Road constructed from detoxified tailings management pad to underground portal.