



Newfoundland Labrador

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: **December 12, 2022**

Approval No. AA22-125694

Expiration: **December 12, 2027**

File No. 735.430

Proponent: **Marathon Gold Corporation**
P.O. Box 4006
Mount Pearl, Newfoundland
A1N OA1

Attention: **James Powell - VP, Regulatory and Government Affairs**

Re: **Valentine Gold Project Temporary Diesel Generators**

Approval is hereby given for the temporary operation of prime power diesel generators associated with the Valentine Gold Project, located approximately 60 km south of the Town of Millertown, Newfoundland and Labrador.

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 requirement 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 Valentine Gold Project Temporary Diesel Generators, including any future expansion of the Valentine Gold Project Temporary Diesel Generators. 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. AA22-125694

December 12, 2022

General

1. This Certificate of Approval is for the temporary operation of prime power diesel generators associated with the Valentine Gold Project. Extensive future expansion or change of activities will require a separate Certificate of Approval.
2. Table 1 provides a summary of the temporary prime power diesel generators included under this approval. Final details for the generators listed shall be submitted to the Department prior to startup.

Table 1 – Summary of Diesel Generators for Valentine Gold Project

Description	Number of Units	Power Rating (kW)	Manufacturer	Model Number
Accommodations Complex	3	1500	Aggreko	GHP/QSB7G6
Exploration Camp	1	150	Caterpillar	TBD
	1	140	Caterpillar	TBD
	1	100	Caterpillar	TBD
Temporary Exploration Camp	1	200	TBD	TBD
	1	175	TBD	TBD
Portable Crusher	1	900	Cummins	1000DQFAD
	1	175	Cummins	175DSGAD
Explosives Facility	1	150	Caterpillar	TBD
Freshwater Intake Pumps	1	150	Caterpillar	TBD
Truck Workshop, Warehouse	1	250	TBD	TBD
Security Gatehouse	1	50	TBD	TBD
Temporary Maintenance Shop	2	150	Caterpillar	TBD
Effluent Treatment and Polishing Ponds	1	250	TBD	TBD
Seepage Pond and Decant Water Pumps	1	250	TBD	TBD
Assay Lab	1	250	TBD	TBD

3. Any inquiries concerning this Approval shall be directed to the Western Regional Office of the Pollution Prevention Division (telephone: (709) 643-6114; or facsimile: (709) 643-8654).
4. In this Certificate of Approval:
 - **associated product** means petroleum or a derivative of it, except gasoline, which is in a liquid state at ambient temperature and pressure;
 - **Department** means the Department of Environment and Climate Change and its successors;
 - **DGSNL** means Digital Government and Service NL and its successors;
 - **GAP** means *Storage and Handling of Gasoline and Associated Products Regulations, 2003*;
 - **licensed** means has a Certificate of Approval issued by the Minister to conduct an activity;
 - **Minister** means the Minister of the Department;
 - **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; ; 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;
 - **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;
 - **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.

5. All necessary measures shall be taken to ensure compliance with all applicable acts, regulations, policies, guidance documents 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; 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, policies, guidance documents 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.

6. 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.

7. **Marathon** shall provide to the Department, within a reasonable time, any information, records, reports or access to data requested or specified by the Department.

8. **Marathon** shall keep all records or other documents required by this Approval at the Valentine Gold project site 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.

9. Should **Marathon** 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 Minister. **Marathon** shall comply with the most current terms and conditions until the Minister 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.

Environmental Protection Plan

10. **Marathon** shall implement the most recent version of the Valentine Gold Project: Construction Environmental Protection Plan (*August 25, 2022*). 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

11. 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.

12. **Marathon** shall continue to implement the Waste Management Plan (***July 2022***) for their Valentine Gold Project (Early Works), 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.

Noise

13. Efforts shall be made to minimize and control noise resulting from operations and maintenance activities associated with the temporary prime power diesel generators utilized for the Valentine Gold Project.

Spill and Leak Prevention and Containment

14. 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.

15. 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.

Contingency Plan

16. **Marathon** shall continue to implement the Contingency Plan (***July 2022***) for their Valentine Gold Project, 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. **Marathon** 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.

17. Every time **Marathon** 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/spill, gas leak, granular chemical leak/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

18. A Rehabilitation and Closure Plan detailing the actions to be taken to restore areas disturbed by the operation has been submitted to the Department (***August 26, 2022***). The Plan shall be implemented progressively as required and completed upon site closure.

19. As part of the site decommissioning and restoration process, **Marathon** 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, **Marathon** shall proceed through the process outlined in the Guidance Document to achieve regulatory site closure.

Used Oil and Used Glycol

20. 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.

21. 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.

22. Used oil and used glycol shall be disposed of by a company licensed for the handling and disposal of such products.

23. 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.

Annual Air Emissions Reporting

24. **Marathon** 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: SO₂, NO_x, CO₂, CO, TPM, and PM_{2.5}; and
- the actual calculations including factors, formulae and/or assumptions used.

Monitoring Alteration

25. Although a monitoring program is not part of this Approval, the Department may require a monitoring program when it is the judgement of the Department that:

- pollutants might be released to the surrounding environment without being detected; or
- an adverse environmental effect may occur.

Reporting

26. 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
- verbal or written complaints of an environmental nature received from the public by **Marathon** and related to the Valentine Gold Project Temporary Diesel Generators, 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.

27. 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.

Expiration

28. This Certificate of Approval expires ***December 12, 2027***.
29. Should **Marathon** wish to continue to operate the Valentine Gold Project Temporary Diesel Generators 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 ***June 12, 2027***.

cc: Ms. Julie Robbins
Environment and Climate Change Canada
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