

Appendix D
Plan Summary

Introduction and Basic Facility Information

This document provides a summary of the Toxic Substance Reduction Plan (“TSRP”) for vanadium, Chemical Abstracts Service (“CAS”) number 7440-62-2. Wesdome Gold Mines Ltd. (“Wesdome”) operates the Eagle River Mill (“Mill”) which is located near Wawa, Ontario, at UTM coordinates 16U 617332 m E, 5329231 m N (NAD83 datum). The Mill extracts gold through mechanical and chemical processing of ore (NAICS code 212220). Thus the facility meets the Toxic Reduction Act (“TRA”) criteria and is considered a regulated facility.

In 2016, Wesdome employed 220 full time employees (equivalent).

The NAICS codes applicable to the facility are:

Two-digit: 21 – Mining & Oil & Gas Extraction

Four-digit: 2122 – Metal Ore Mining

Six-digit: 212220 – Gold & Silver Ore Mining

The facility’s NPRI ID is 10010.

The public and technical contact for the facility is Bobby Doroudiani, Mill Metallurgist,

Mailing address:

93 Mission Rd.

PO Box 1520

Wawa, ON

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Phone: (705) 856-2721 ext. 181

Email: bobby.doroudiani@wesdome.ca

List of All Substances for which a Toxic Substance Reduction Plan has been Prepared at the Facility

Wesdome also has TSRP plans for other contaminants including: arsenic, cadmium, chromium, cobalt, copper, lead, manganese, nickel, selenium, zinc, cyanide, particulate matter, phosphorus, and hydrochloric acid.

Objectives of the Plan

Wesdome is committed to playing a leadership role in protecting the environment. Wherever feasible, Wesdome will eliminate or reduce the use, creation, and discharge of vanadium in full compliance with all federal and provincial regulations. Toxic substance reduction will be an ongoing effort, and Wesdome will continue to monitor technological advancements to ensure that options that are both technologically and financially feasible are implemented at the facility.

It is the goal of Wesdome to minimize the ecological footprint at their operations, while conducting business in a safe, efficient, and cost-effective manner.

Description of Each Process that Uses the Toxic Substance

The main raw material at the Mill is ore which contains naturally occurring metals and minerals, including vanadium. In 2015, Wesdome released to the Tailings Pond approximately 19.9 tonnes of vanadium which exceeded the NPRI use reporting threshold and thus was required to report releases. In 2016, Wesdome released to the Tailings Pond 36.4 tonnes of vanadium. In 2014, and previous years, the vanadium release did not exceed the NPRI threshold. It is expected the concentration of vanadium in the ore will vary, exceeding or missing the threshold, from year to year.

Rationale for not Implementing Toxic Reduction Options

In response to the enactment of the TRA and Ontario Regulation 455/09, Wesdome has examined toxic substance reduction in accordance with the aforementioned legislation and has determined that no technically feasible options exist to reduce the use and/or creation of vanadium beyond current operating practices.

Statement that the Plan Summary Accurately Reflect the Current Version of the Plan

This summary accurately reflects the content of the toxic substance reduction plan for vanadium prepared on behalf of Wesdome, dated 4 May 2017.

Planner Licence Number

The licensed Toxic Substance Reduction Planner responsible for providing planner recommendations on and certification of this plan is as follows:

Marie Manchester

EIT, Story Environmental Inc.

Toxic Substance Reduction Planner Licence: TSRP0308

Certifications

A copy of the Certification statements is attached.

Highest Ranking Employee

As of 4 May 2017, I, Jeff Hutchings, certify that I have read the toxic substance reduction plan for the toxic substance referred to below and am familiar with its contents, and to my knowledge the plan is factually accurate and complies with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

Toxic Substance: Vanadium



Jeff Hutchings
General Manager, Eagle River
Wesdome Gold Mines Ltd.

Licensed Planner

As of 4 May 2017, I, Marie Manchester, certify that I am familiar with the processes at the Eagle River Mill that use or create the toxic substance referred to below, that I agree with the estimates referred to in subparagraphs 7 iii, iv and v of subsection 4 (1) of the Toxics Reduction Act, 2009 that are set out in the plan dated 4 May 2017 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

Toxic Substance: Vanadium



Marie Manchester, EIT
Story Environmental Inc.
Planner Licence: TSRP0308