ARTEMIS GOLD INC

Blackwater Mine

Air Quality Trigger Response Plan (TRP) for Fugitive Dust Non-Point Source Discharges to Air

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Air Quality and Fugitive Dust Management Plan

Version:	B.1
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Acronyms and Abbreviations

µm	Microns or micrometres
AQDMP	Air Quality and Fugitive Dust Management Plan
BC	British Columbia
BC ENV	Ministry of Environment and Climate Change Strategy
BW Gold or Proponent	BW Gold LTD.
EAO	Environmental Assessment Office
ELoMC	BW Gold's Environmental Life of Mine Committee
EMC	Environmental Monitoring Committee
Indigenous nations	Lhoosk'uz Dené Nation, Ulkatcho First Nation, Nadleh Whut'en First Nation, Stellat'en First Nation, Saik'uz First Nation, and Nazko First Nation (as defined in the Project's Environmental Assessment Certificate #M19-01)
m^3	Cubic metres
New Gold	New Gold Inc.
PM	Particulate matter
PM_{10}	Particulate matter less than 10 micrometres in diameter
$PM_{2.5}$	Particulate matter less than 2.5 micrometres in diameter
Project	Blackwater Gold Project
SOP	Standard operating procedure
Tatelkus Lake 28	Tatelkus Lake Indian Reserve 28
TSP	Total suspended particulate

1.0 Purpose and Introduction

This document is the Air Quality Trigger Response Plan (TRP) for Fugitive Dust Non-Point Source Discharges for the Blackwater Project (the Project). Fugitive dust is defined as dust that is not emitted from definable point sources, such as industrial stacks. A TRP is a proactive tool that can help facility operators manage and respond to changing conditions or situations before the situation becomes problematic or results in harm to the environment, human health, or damage to infrastructure (BC ENV 2022b).

Non-point source fugitive dust discharge for the purpose of this plan is defined as dust that is not emitted from definable point sources, such as industrial stacks.

This TRP is a requirement of the Project's air discharge permit number 110650 issued under the *Environmental Management Act* (dated May 2, 2023; BC ENV 2023):

> *4.2.1 The permittee must cause a Qualified Professional to develop a Trigger Response Plan (TRP) for authorized non-point source discharge relating to fugitive dust. The permittee must submit the TRP for approval to the director within 60 days after the issuance of this authorization.*

This TRP is used in conjunction with the Project's Air Quality and Fugitive Dust Management Plan (AQDMP; ERM 2023). Much of the information in this TRP is related to the AQDMP. Background information about the Project, facility descriptions and descriptions of air emission sources (both point-sources and non-point sources) are described in the AQDMP (ERM 2023).

This TRP is specific to fugitive dust, including total suspended particulate (TSP), particulate matter < 10 micrometres (µm) in diameter (PM_{10}) and particulate matter < 2.5 µm in diameter ($PM_{2.5}$). Non-fugitive dust air contaminants are not included in this TRP (BC ENV 2023) and are included in the AQDMP.

This TRP will be implemented during construction, operations and closure, in conjunction with the AQDMP. The latest version of this TRP must be implemented and the most recent version must be onsite at the mine for inspection by a BC ENV Officer (BC ENV 2023).

2.0 Air Quality Triggers and Responses

Fugitive dust triggers, locations and response actions are summarized in Table 2-1.

For reference, the background/baseline concentrations of TSP, PM_{10} and $PM_{2.5}$ in the Blackwater Gold Project Air Quality Modelling Technical Data Report were 18, 9 and 4 µg/m^3, respectively (AMEC 2014), and applied to all averaging periods.

Table 2-1: Fugitive Dust Trigger Action Response

Component	Location	Permit Limit	Level	Trigger	Management Response	Documentation, and People and Parties to Notify
Fugitive Dust (TSP)	Unpaved Roads	Indeterminant1	None	• Dust plume less than half the height of a haul truck tire.	• No action. Continue work in accordance with site management procedures.	No action.
			Level 1, Low	• Dust plume less than half the size of a haul truck for any period of time up to 30 minutes.	• Limited watering of high traffic areas. • Repeat visual inspection every 2 hours depending on weather.	• Immediately report to Departmental Manager.
			Level 2, Medium	• Dust plume same size as a haul truck extending beyond local area for periods longer than half a day.	• Continuous watering of high traffic areas until dust plume subsides. • Speed limit restrictions in high traffic areas.	• Immediately report to Departmental Manager, Environmental Manager, Mine Manager and Qualified Professional. • Immediately provide email notification and supporting information to the BC ENV Director[2]: envauthorizationsreporting@gov.bc.ca. • After inspections are complete, a log of the findings will be filled out by the Departmental Manager.

Component	Location	Permit Limit	Level	Trigger	Management Response	Documentation, and People and Parties to Notify
			Level 3, High	• Dust plume greater than the size of a haul truck for periods longer than 1 day, or when dust plumes extend beyond the active mine area/infrastructure.	• Increase frequency of watering and if not successful examine longer use of alternative dust suppressants (e.g., calcium or magnesium chloride, lignin compounds, environmentally friendly oils or clay additives). • Speed limit restrictions may be required if dust cannot be controlled by watering. • Closure of certain routes may be required if dust cannot be controlled by watering or speed restrictions.	• Immediately report to Departmental Manager, Environmental Manager, Mine Manager and Qualified Professional. • Immediately provide email notification and supporting information to the BC ENV Director[2]: envauthorizationsreporting@gov.bc.ca. • Notify Indigenous Nations. • After inspections are complete, a log of the findings will be filled out by the Departmental Manager.
	Surface Earthworks	Indeterminant1	None	• Minor localized dust (dust plumes that are less than 2 m in height) during construction and normal mine operations.	• No action. Continue work in accordance with site management procedures.	• No action.

Component	Location	Permit Limit	Level	Trigger	Management Response	Documentation, and People and Parties to Notify
			Level 1, Low	• Visible dust plumes rising over 2 m above the active construction area for longer than 30 minutes.	• Minimize material movement in areas with active construction or operation and heavy equipment use.	• Immediately report to Departmental Manager.
			Level 2, Medium	• Triggers per level 1 but with dust plume extending beyond local area for periods longer than half a day.	• Application of water to exposed construction area (if this is a source).	• Immediately report to Departmental Manager, Environmental Manager, Mine Manager and Qualified Professional. • Immediately provide email notification and supporting information to the BC ENV Director[2]: envauthorizationsreporting@gov.bc.ca. • After inspections are complete, a log of the findings will be filled out by the Departmental Manager.
			Level 3, High	• Extensive areas of dust generation with large dust plumes for periods longer than 1 day or when dust plumes extend beyond the active mine area/ infrastructure.	• Increase frequency of watering and if not successful apply gravel to exposed construction area (if this is a source). • Investigate long term solutions if dust plumes persist.	• Immediately report to Departmental Manager, Environmental Manager, Mine Manager and Qualified Professional. • Immediately provide email notification and supporting information to the BC ENV Director[2]: envauthorizationsreporting@gov.bc.ca. • Notify Indigenous Nations • After inspections are complete, a log of the findings will be filled out by the Departmental Manager.
Fugitive Dust (TSP) *(cont'd)*	Stockpiles	Indeterminant1	None	• Minor localized dust (dust plumes that are less than 2 m in height) during construction and normal mine operations.	• No action. Continue work in accordance with site management procedures.	• No action.

Component	Location	Permit Limit	Level	Trigger	Management Response	Documentation, and People and Parties to Notify
			Level 1, Low	• Visible dust plumes rising over 2 m above the ground for longer than 30 minutes.	• Turn on spray bar sprinklers[5]. • During periods where temperatures are below freezing add reagents to control dust.	• Immediately report to Departmental Manager.
			Level 2, Medium	• Triggers per level 1 but with dust plume extending beyond local area for periods longer than half a day.	• Increase the rate of water application using spray bar sprinklers[5]. During periods where temperatures are consistently below freezing, add reagents to control dust.	• Immediately report to Departmental Manager, Environmental Manager, Mine Manager and Qualified Professional. • Immediately provide email notification and supporting information to the BC ENV Director[2]: envauthorizationsreporting@gov.bc.ca. • After inspections are complete, a log of the findings will be filled out by the Departmental Manager.
			Level 3, High	• Extensive areas of dust generation with large dust plumes for periods longer than 1 day or when dust plumes extend beyond the active mine area/infrastructure.	• Examine the possibility of re engineering the spray bar sprinklers[5] to provide more effective water coverage of transfer points.	• Immediately report to Departmental Manager, Environmental Manager, Mine Manager and Qualified Professional. • Immediately provide email notification and supporting information to the BC ENV Director[2]: envauthorizationsreporting@gov.bc.ca. • Notify Indigenous Nations. • After inspections are complete, a log of the findings will be filled out by the Departmental Manager.
	Material handling transfer locations	Indeterminant1	None	• Minor localized dust (dust plumes that are less than 2 m in height) during construction and normal mine operations.	• No action. Continue work in accordance with site management procedures.	• No action.

Component	Location	Permit Limit	Level	Trigger	Management Response	Documentation, and People and Parties to Notify
			Level 1, Low	• Visible dust plumes rising over 2 m above the ground for longer than 30 minutes.	• Turn on spray bar sprinklers[5]. • During periods where temperature are below freezing add reagents to control dust.	• Immediately report to Departmental Manager.
			Level 2, Medium	• Triggers per level 1 but with dust plume extending beyond local area for periods longer than half a day.	• Increase the rate of water application using spray bar sprinklers. • During periods where temperature are below freezing, add reagents to control dust.	• Immediately report to Departmental Manager, Environmental Manager, Mine Manager and Qualified Professional. • Immediately provide email notification and supporting information to the BC ENV Director[2]: envauthorizationsreporting@gov.bc.ca. • After inspections are complete, a log of the findings will be filled out by the Departmental Manager.
			Level 3, High	• Extensive areas of dust generation with large dust plumes for periods longer than 1 day or when dust plumes extend beyond the active mine area/infrastructure.	• Examine the possibility of re engineering the spray bar sprinklers to provide more effective water coverage of transfer points.	• Immediately report to Departmental Manager, Environmental Manager, Mine Manager and Qualified Professional. • Immediately provide email notification and supporting information to the BC ENV Director[2]: envauthorizationsreporting@gov.bc.ca. • Notify Indigenous Nations. • After inspections are complete, a log of the findings will be filled out by the Departmental Manager.

Component	Location	Permit Limit	Level	Trigger	Management Response	Documentation, and People and Parties to Notify
PM_{10} and $PM_{2.5}$	Operations Camp	PM_{10} (24-hour average): 50 µg/m^3 $PM_{2.5}$ (24-hour average): 25 µg/m^3 $PM_{2.5}$ (annual average): 8 µg/m^3	None	The PM_{10} and $PM_{2.5}$ concentration is less than or equal to 50% of the Ambient Air Quality Objective4, or less than or equal to the baseline value: • PM_{10} (24-hour average): ≤25 µg/m^3 • $PM_{2.5}$ (24-hour average): ≤12.5 µg/m^3 • $PM_{2.5}$ (annual average): ≤4 µg/m^3	• No action. Continue monitoring.	• No action.
			Level 1, Low	The PM_{10} and $PM_{2.5}$ concentration is greater than 50% but less than or equal to 80% of the Ambient Air Quality Objective4, and is above the baseline value: • PM_{10} (24-hour average): >34 and ≤40 µg/m^3 • $PM_{2.5}$ (24-hour average): >12.5 and ≤20 µg/m^3 • $PM_{2.5}$ (annual average): >4 and ≤6.4 µg/m^3	• Continue monitoring. • Develop causal analysis and associated mitigations in addition to a schedule for implementation based on the exceedance level.	• Immediately report to Departmental Manager.

Component	Location	Permit Limit	Level	Trigger	Management Response	Documentation, and People and Parties to Notify
			Level 2, Medium	The PM_{10} and $PM_{2.5}$ concentration is greater than 80% but less than or equal to 100% of the Ambient Air Quality Objective4: • PM_{10} (24-hour average): >40 and ≤50 µg/m^3 • $PM_{2.5}$ (24-hour average): >20 and ≤25 µg/m^3 • $PM_{2.5}$ (annual average): >6.4 and ≤8 µg/m^3	• Develop causal analysis and associated mitigations in addition to a schedule for implementation. • Increase sampling frequency to every other day.	• Immediately report to Departmental Manager, Environmental Manager, Mine Manager and Qualified Professional. • Immediately provide email notification and supporting information to the BC ENV Director[2]: envauthorizationsreporting@gov.bc.ca. • After inspections are complete, a log of the findings will be filled out by the Departmental Manager.
			Level 3, High	The PM_{10} and $PM_{2.5}$ concentration is greater than the Ambient Air Quality Objective4. PM_{10} (24-hour average): >50 µg/m^3 $PM_{2.5}$ (24-hour average): >25 µg/m^3 $PM_{2.5}$ (annual average): >8 µg/m^3	• Implement mitigations developed at the medium action level. • Increase sampling frequency to daily.	• Immediately report to Departmental Manager, Environmental Manager, Mine Manager and Qualified Professional. • Immediately provide email notification and supporting information to the BC ENV Director[2]: envauthorizationsreporting@gov.bc.ca. • Notify Indigenous Nations • After inspections are complete, a log3 of the findings will be filled out by the Departmental Manager.

Notes:

[1] The air discharge Permit 110650 states the maximum authorized rate of discharge for fugitive dust is indeterminant (BC ENV 2023).

[2] The air discharge Permit 110650 states: "4.2.5 If any medium or high triggers listed in the TRP are exceeded, the permittee must immediately provide notification to the director via email to envauthorizationsreporting@gov.bc.ca. This notification must include the following information: a) Any supporting data confirming the exceedance of the trigger, and b) A summary of the actions taken and/or planned in response to the trigger exceedance." (BC ENV 2023)

[3] The log will contain information on the location where dust plumes were visible, their approximate size and temporal persistence, activities occurring that may have caused the dust plume, meteorological conditions at the time and any actions taken. See Section 3 for more information.

[4] The most recent BC Ambient Air Quality Objectives are to be used: BC ENV 2022a. These values will be updated by the government over time.

[5] Spray bar sprinklers will be installed once trialing is complete.

3.0 Monitoring Plan

3.1 TSP

TSP fugitive dust monitoring involves the visual identification of dust plumes as described in Table 2-1. Fugitive dust monitoring is described in the AQDMP, along with monitoring methods for other pollutants. The AQDMP text specific to fugitive dust monitoring is provided in the paragraphs below.

Mine personnel will be trained to be observant for dust related concerns which may arise. These observations, together with meteorological conditions and mitigation efforts taken to deal with an issue, will be recorded and included in annual reports. Dust visual monitoring will focus on areas where there are active surface earthworks, haul roads and overburden, and soil stockpiles.

Visual monitoring will occur at all locations where fugitive dust generation is occurring.

The visual dust monitoring program is intended to contribute to:

- visual identification and recording of fugitive dust events;
- assessment of the effectiveness of mitigation and management measures;
- identification of effects requiring further mitigation efforts; and
- compliance with permit, approvals, and regulatory requirements.

The visual monitoring program will consist of visual observations and documentation of fugitive dust by mine personnel. During periods of wind greater than 5 m/s and when the ground is not covered under snow, Departmental Managers responsible for the areas listed will perform visual monitoring for dust at the following locations:

- locations of active surface earthworks;
- active haul roads; and
- overburden and soil stockpiles.

In addition to these regular inspections mine personnel will be directed to inform Departmental Managers if persistent dust plumes are visible.

Inspections will not be recorded under level “none” described in the Trigger Action Response Table (Table 2-1). For Level “Medium” or “High” Alert events in the Table 2-1, after inspections are complete, a log of the findings will be filled out by the Departmental Manager referenced above. The log will contain information on the location where dust plumes were visible, their approximate size and temporal persistence, activities occurring that may have caused the dust plume, meteorological conditions at the time and any actions taken.

Monitoring will be conducted by competent personnel as designated by the Environment Manager. Data will be reported in compliance with Permit #110650 requirements (BC ENV 2023) and will be kept and made available to others for review upon request.

Employees and contractors will receive awareness-level training in fugitive dust management and air quality on their arrival on site through an environmental on-boarding training session and prior to the start of work as part of the Site Orientation. The purpose of this training is to provide all site personnel with a basic level of environmental awareness and an understanding of their obligations regarding compliance with regulatory requirements, commitments, and best practices.

Site supervisors will be provided with a copy of the AQDMP and the TRP and will be responsible for understanding and implementing the AQDMP, TRP, and operational SOPs with respect to their individual work areas. The EM will ensure additional training and advice is provided as needed. PM_{10} and $PM_{2.5}$.

The AQDMP text specific to PM_{10} and $PM_{2.5}$monitoring is provided in the paragraphs below.

A Thermo Scientific Partisol-FRM Model 2025i-D PM sampler will be installed on the mine site at the exploration camp before the start of major works construction and moved to the operations camp at the start of operations. The camp is the nearest sensitive receptor to mine operations. The station will measure PM_{10} and $PM_{2.5}$ mass concentrations on a 47 mm filter contained in a single-action filter change mechanism.

Samples will be collected over a 24-hour period at a target flow rate of 1 m^3/h. Sample volumes will be recorded and divided into the mass concentration to yield a 24-hour average concentration in units of $\mu g/m^3$. The Partisol sampler is suitable for a wide variety of climate conditions and meets the United States Environmental Protection Agency guidelines for manual air samplers.

Fine particulate sampling will occur every third day for PM_{10} and $PM_{2.5}$, between May and October. During November to April, sampling PM_{10} and $PM_{2.5}$ will occur on a six-day basis.

The location of Partisol monitoring is expected to change with the development of a permanent operations camp.

For Level “Medium” or “High” Alert events in the Table 2-1, after inspections are complete, a log of the findings will be filled out by the Departmental Manager referenced above. The log will contain information on the location where dust plumes were visible, their approximate size and temporal persistence, activities occurring that may have caused the dust plume, meteorological conditions at the time and any actions taken.

4.0 Trigger Exceedances

Trigger exceedances of Medium and High Levels (Table 2-1) will be documented in a log, as described in Section 3. The log will contain information on the location where dust plumes were visible, their approximate size and temporal persistence, activities occurring that may have caused the dust plume, PM_{10} and $PM_{2.5}$ concentrations, meteorological conditions at the time and any actions taken.

When wildfires occur in the region, the air quality can deteriorate at the mine. When PM_{10} and $PM_{2.5}$ monitoring are conducted on days when wildfire smoke is impacting the mine, the resulting concentrations of PM_{10} and $PM_{2.5}$ can increase due to the wildfire smoke, and potentially cause trigger level exceedances. On days with wildfire smoke present at the mine, this should be documented in a log to help determine if PM_{10} and $PM_{2.5}$ trigger exceedances were related to wildfire smoke. PM_{10} and $PM_{2.5}$ data can also be compared against BC ENV air quality community monitoring stations on these same days. FireSmoke Canada (https://firesmoke.ca/) can also be used to estimate the ground-level $PM_{2.5}$ concentrations that will impact the mine (select daily average forecast data to compare against the daily average $PM_{2.5}$ monitoring results). Data used from these sources should be documented in the log.

Each time a trigger level is exceeded, the log should be reviewed to see if there has been a persistent trigger exceedance trend over time. If persistent trigger exceedances are confirmed, a qualified professional will need to evaluate if an impact assessment for environmental and human health risks is needed, depending on the severity and duration of the exceedance and the receptors involved.

5.0 Mitigation Measures

Mitigation measures for each fugitive dust trigger level are presented in Table 2-1. Mitigation measures for other air emission pollutants are described in the AQDMP.

6.0 Reporting and Notification Process

The reporting and notification process for each fugitive dust trigger level are presented in Table 2-1 and summarized below:

- Level 1, Low
  - Immediately report to Departmental Manager.
- Level 2, Medium
  - Immediately report to Departmental Manager.
  - Immediately report to Environmental Manager, Mine Manager and Qualified Professional.
  - Immediately provide email notification and supporting information to the BC ENV Director: envauthorizationsreporting@gov.bc.ca
  - After inspections are complete, a log of the findings will be filled out by the Departmental Manager.
- Level 3, High
  - Immediately report to Departmental Manager.
  - Immediately report to Environmental Manager, Mine Manager and Qualified Professional.
  - Immediately provide email notification and supporting information to the BC ENV Director: envauthorizationsreporting@gov.bc.ca
  - The Environment Manager or their designate will notify Indigenous Nations
  - After inspections are complete, a log of the findings will be filled out by the Departmental Manager.

7.0 TRP Review and Revisions

7.1 TRP Annual Review by ELoMC

The TRP will be reviewed and revised in conjunction with the AQDMP. The review and revisions of the AQDMP are described below:

The AQDMP will be reviewed annually by a qualified professional per BW Gold's Environmental Life of Mine Committee (ELoMC) annual schedule to: review the monitoring program; confirm that the measures in the plan are being implemented; and identify any improvements to improve the effectiveness of fugitive dust best management practices. AQDMP revisions will be required:

- if the monitoring program shows that the effects of the Project are not mitigated to the extent contemplated or predicted in the Application/EIS or exceed adaptive management triggers;
- there are new and /or changes to emission sources;
- there are changes to other relevant management plans and regulatory requirements; and
- there are amendments to the operating permit conditions.

Proposed changes will be documented via the provision of a change log document including rationale for changes, which will be provided at the same time (where possible) or following resubmission of the AQDMP. As required by EAC #M19-01 Condition 20, the plan and any amendments thereto, will be implemented to the satisfaction of a qualified professional throughout construction, operations, and closure and to the satisfaction of the EAO. Revised draft and final versions of the AQDMP will be provided to Environmental Assessment Office (EAO), Environmental Monitoring Committee (EMC), and Northern Health through the Condition 42 public website. Upon submissions of updated Management plans, reviewers will be invited to share and direct any comments, questions, or concerns on the AQDMP updates through the ELoMC. Regular presentations of implementation of management plans including the AQDMP will also be provided to reviewers per the ELoMC annual schedule of topics/development of monthly meeting agendas.

7.2 TRP 3-year Review Report for BC ENV

The air discharge permit requires that this TRP will be reviewed every three years by a qualified professional, with the first review conducted in 2026. A qualified professional will develop a TRP Review Report based on the findings of the TRP review. The TRP Review Report will be submitted to the BC ENV as part of the Annual Report for Permit No. 110650 for the year in which the TRP review was conducted (BC ENV 2023).

The TRP Review Report will include:

- an assessment of the effectiveness of the TRP in ensuring that the provincial air quality objectives (BC ENV 2022a) are not exceeded;
- a summary of all the exceedances of trigger levels (Table 2-1) over the last three years;
- a summary of the likely causes of exceedances;
- a summary of all the actions planned or taken in accordance with the responses listed in the TRP;
- an assessment of the efficacy of mitigation included in Table 2-1; and
- recommendations for updates to the TRP.

7.3 TRP Revisions

Based on the outcomes of the annual TRP review by the ELoMC (Section 7.1) or the 3-year Review Report (Section 7.2), a qualified professional will revise the TRP based on the recommended updates. The revised TRP will be submitted to the BC ENV director within 30 days of the submission of the Annual Report. If any recommendations from the 3-year Review Report are not included in the revised TRP, justification will be provided to the BC ENV director (BC ENV 2023). The revised TRP document version and version date will be noted on the QP authenticated version.

7.4 Modifications Requested by BC ENV

The air discharge permit requires that a qualified professional modify this TRP when required by the BC ENV director. The modified TRP will be submitted to the director within the timeframe specified by the director.

8.0 Qualified Professionals

This management plan has been prepared and reviewed by the following qualified registered professionals:

Reviewer Role	Name	Signature	Date
Prepared by:	Daniel Casanova, B.Sc., EP (Air Quality) Senior Consultant		June 29, 2023
Reviewed by:	Andres Soux, M.Sc. Principal Consultant		June 29, 2023
Reviewed by:	Rolf Schmitt, P.Geo. Technical Director		June 29, 2023

ERM Permit to Practice No: 1001271

9.0 References

Definitions of the acronyms and abbreviations used in this reference list can be found in the Acronyms and Abbreviations section.

AMEC. 2014. *Blackwater Gold Project Air Quality Modelling Technical Data Report*. Prepared for New Gold Inc. by AMEC Environment & Infrastructure.

BC ENV. 2022a. *Air Quality Objectives and Standards*. https://www2.gov.bc.ca/gov/content/environment/air-land-water/air/air-quality-management/regulatory-framework/objectives-standards (accessed June 2023).

BC ENV. 2022b. *Development and Use of Trigger Response Plans*. https://www2.gov.bc.ca/assets/gov/environment/waste-management/industrial-waste/industrial-waste/mining-smelt-energy/guidance-documents/tg12_trigger_response_plans.pdf (accessed June 2023).

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