



Reference: 393620

December 19, 2022

Matt Boulton
Junior Partner, Mack Law Corporation
7297 West Saanich Road
Saanichton, B.C. V8M 1R7

Sent via email: matt@macklawcorp.ca

Dear Matt Boulton:

Thank you for your email of November 4, 2022, regarding the Ajax Mine effluent discharge permit and your recommendations for additional monitoring and analysis. We are committed to protecting the environment and ensuring mitigations are in place to avoid any potential environmental impacts from permitted effluent discharges, and your recommendations are helpful in that regard.

I have shared your correspondence representing the Kamloops Area Preservation Association (KAPA) dated November 2, 2022, with ministry staff in charge of the administration of the Ajax Mine effluent discharge permit PE-3904. I understand that a similar letter and request by KAPA was sent to the Ministry in October 2020. Based on that letter, ministry staff conducted a review of the file in 2021 and determined that additional monitoring was not warranted. Instead, staff determined that a more comprehensive assessment of the data being collected should be conducted by the permittee as part of the annual reporting requirements, including recommendations for future monitoring.

The Ajax mine permit was amended January 7, 2022, and included changes to the reporting requirements to allow for evaluation of water quality conditions and environmental effects in Peterson Creek including any water quality exceedances, reasons for the exceedances and the potential environmental risks posed by the exceedances. These additional requirements are expected to improve the annual report reviews and complement the 5-year assessment report also required under the effluent discharge permit.

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A copy of the amended permit is available via the ministry website here:

<https://j200.gov.bc.ca/pub/ams/Default.aspx?PossePresentation=DocumentSearch>, using the authorization number 3904.

In the November 2022 letter, you refer to the review of the Ajax Mine 2021 annual report, which was conducted by Dr Kevin Morin; you also refer to Dr Morin's six recommendations for additional monitoring. It appears that this report was based on the older permit conditions and does not reflect the changes to the permit made in January 2022. Ministry staff are currently reviewing the 2021 report and are waiting for the 2022 annual report which is due March 31, 2023. The 2022 annual report will reflect the reporting changes required from the January permit amendment.

Ministry staff have also met with Stk'emlupsemc te Secwepemc Nation representatives who have also referred to Dr Kevin Morin's review of the 2021 Ajax annual report and his recommendations. It would be very helpful if you would please share Dr. Morin's summary report of his review of the 2021 Ajax annual report with my staff.

Once ministry staff have completed their review of the 2021 annual report and the 2022 annual report (with the new assessment and recommendation requirements) they will be able to make a more informed assessment of the receiving environment to determine the potential for adverse impacts and if any further monitoring requirements are necessary for either groundwater or surface water. Ministry staff would be happy to work with SSN and KAPA once they have had an opportunity to review the report to assess whether a permit amendment is required and what, if any, additional monitoring should be considered.

I would like to suggest that you meet with Deb Epps, Director of Mining Operations at your convenience. She will be happy to discuss the permit and approach. Please contact her directly at Deb.Epps@gov.bc.ca or call 250-713-2906 and she can set up a time to meet.

Thank you again for your interest in protecting the environment and for taking the time to write.

Sincerely,



George Heyman
Minister