



Report Date: April 3, 2017

File:107461

Report Number: 048281

Mount Polley Mining Corporation
P.O. BOX 12 Likely, BC
V0L 1N0

Dear Mount Polley Mining Corporation,

Re: Notice Letter, Pollution Abatement Order 107461, Mount Polley Mining Corporation near P.O. BOX 12 LIKELY, BC V0L 1N0, Effluent

On April 3, 2017, Ministry of Environment, Environmental Protection Division staff, completed an Office Review inspection of Mount Polley Mining Corporation (MPMC), Pollution Abatement Order 107461 (Order); dated August 5, 2014. The review was limited to a desktop analysis of the Order and any amendments made to the Order between August 5, 2014 and January 19, 2017.

Inspection Details:

Requirement Description:	2014-08-05 PAO 1: Immediately take action, under the direction of a suitably qualified professional, to abate the discharge of mine-affected materials and sediments from the impoundment facility, and specifically into Polley Lake, Hazeltine Creek and Quesnel Lake. A written summary of actions taken must be submitted to the Director on August 13, 2014.
Details/Findings:	A letter that was sent from the Ministry to Mount Polley Mining Corporation (MPMC) on June 15, 2015, deemed this requirement as complete.
Compliance:	In
Actions to be taken:	
Requirement Description:	2014-08-05 PAO 2: Immediately retain a suitably qualified professional to initiate a preliminary Environmental Impact Assessment (EIA) and provide the name of the qualified professional to the Director for approval by August 6, 2014.
Details/Findings:	A response was received from MPMC on August 6, 2014 satisfying this requirement. Jack Love B.Sc., R.P.Bio (Imperial Metals), Pierre Stecko M.Sc., EP, R.P.Bio (Minnow Environmental Inc.) and Norm Zimhelt (Environmental Quality Inc.) were all retained for the preliminary Environmental Impact Assessment (EIA).
Compliance:	In
Actions to be taken:	
Requirement Description:	2014-08-05 PAO 3: Retain a suitably qualified professional to initiate a comprehensive Environmental Impact Assessment (EIA) and provide the name of the qualified professional to the Director for approval by August 13, 2014.
Details/Findings:	A letter that was sent from the Ministry to MPMC on June 15, 2015, deemed this requirement as complete.
Compliance:	In

Ministry of Environment

Compliance
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Actions to be taken:	
Requirement Description:	2014-08-05 PAO 4: Upon completion of the preliminary EIA, immediately implement clean up activities, mitigation measures and management actions as required by the EIA.
Details/Findings:	A letter that was sent from the Ministry to MPMC on June 15, 2015, deemed this requirement as complete.
Compliance:	In
Actions to be taken:	
Requirement Description:	2014-08-05 PAO 5: Upon completion of the comprehensive EIA, immediately implement clean up activities, mitigation measures, site restoration and management actions as required by the comprehensive EIA.
Details/Findings:	A letter that was sent from the Ministry to MPMC on June 15, 2015, deemed this requirement as complete.
Compliance:	In
Actions to be taken:	
Requirement Description:	2014-08-05 PAO 6(a): Based on the preliminary EIA, develop and submit to the Director by August 6, 2014 for approval, an Action Plan detailing measures relative to the preliminary EIA to be taken to: (a) Characterize the materials that were released into the receiving environment (including their expected behaviour in the receiving environment, settling rates, etc.).
Details/Findings:	A letter that was sent from the Ministry to MPMC on June 15, 2015, deemed this requirement as complete.
Compliance:	In
Actions to be taken:	
Requirement Description:	2014-08-05 PAO 6(b): Based on the preliminary EIA, develop and submit to the Director by August 6, 2014 for approval, an Action Plan detailing measures relative to the preliminary EIA to be taken to: (b) Recover or otherwise manage mine-affected materials and sediments currently in the receiving environment.
Details/Findings:	A letter that was sent from the Ministry to MPMC on June 15, 2015, deemed this requirement as complete.
Compliance:	In
Actions to be taken:	
Requirement Description:	2014-08-05 PAO 6(c): Based on the preliminary EIA, develop and submit to the Director by August 6, 2014 for approval, an Action Plan detailing measures relative to the preliminary EIA to be taken to: (c) Mitigate residual risks to the environment.
Details/Findings:	A letter that was sent from the Ministry to MPMC on June 15, 2015, deemed this requirement as complete.
Compliance:	In
Actions to be taken:	

Requirement Description:	2014-08-05 PAO 6(d): Based on the preliminary EIA, develop and submit to the Director by August 6, 2014 for approval, an Action Plan detailing measures relative to the preliminary EIA to be taken to: (d) Assess and monitor the impacts and risks posed by the mine-affected materials and sediments currently in the receiving environment, as well as from the recovery and management efforts themselves, and
Details/Findings:	A letter that was sent from the Ministry to MPMC on June 15, 2015, deemed this requirement as complete.
Compliance:	In
Actions to be taken:	
Requirement Description:	2014-08-05 PAO 6(e): Based on the preliminary EIA, develop and submit to the Director by August 6, 2014 for approval, an Action Plan detailing measures relative to the preliminary EIA to be taken to: (e) Report on the implementation of Action Plan measures on a weekly basis to regulatory agencies and stakeholders.
Details/Findings:	A letter that was sent from the Ministry to MPMC on June 15, 2015, deemed this requirement as complete.
Compliance:	In
Actions to be taken:	
Requirement Description:	2014-08-05 PAO 7(a): Based on the comprehensive EIA, develop and submit to the Director by August 15, 2014 for approval, an Action Plan detailing measures relative to the comprehensive EIA to be taken to: (a) Fully characterize the materials that were released into the receiving environment (including their expected behaviour in the receiving environment, settling rates, etc.).
Details/Findings:	A response was received from MPMC on August 6, 2014 satisfying this requirement. The submission included a series of tables that characterize the tailings supernatant and tailing sands that migrated through the breach. The tailings material was fully characterized in the Post-Event Environmental Impact Assessment Report v1 (PEEIAR v1) that was submitted on June 9, 2015.
Compliance:	In
Actions to be taken:	
Requirement Description:	2014-08-05 PAO 7(b): Based on the comprehensive EIA, develop and submit to the Director by August 15, 2014 for approval, an Action Plan detailing measures relative to the comprehensive EIA to be taken to: (b) Fully recover or otherwise manage mine-affected materials and sediments currently in the receiving environment.
Details/Findings:	Section 4 of the Action Plan that was submitted to the Ministry by MPMC on August 15, 2014 satisfied this requirement.
Compliance:	In
Actions to be taken:	
Requirement Description:	2014-08-05 PAO 7(c): Based on the comprehensive EIA, develop and submit to the Director by August 15, 2014 for approval, an Action Plan detailing measures relative to the comprehensive EIA to be taken to: (c) Define Site mitigation and/or mitigate residual risks to the environment.

Details/Findings:	Section 4 of the Action Plan that was submitted to the Ministry by MPMC on August 15, 2014 satisfied this requirement.
Compliance:	In
Actions to be taken:	
Requirement Description:	2014-08-05 PAO 7(d): Based on the comprehensive EIA, develop and submit to the Director by August 15, 2014 for approval, an Action Plan detailing measures relative to the comprehensive EIA to be taken to: (d) Assess and monitor the impacts and risks posed by the mine-affected materials and sediments currently in the receiving environment, as well as from the recovery and management efforts themselves, and
Details/Findings:	Section 3 and Section 5 of the Action Plan that was submitted to the Ministry by MPMC on August 15, 2014 satisfied this requirement.
Compliance:	In
Actions to be taken:	
Requirement Description:	2014-08-05 PAO 7(e): Based on the comprehensive EIA, develop and submit to the Director by August 15, 2014 for approval, an Action Plan detailing measures relative to the comprehensive EIA to be taken to: (e) Report on the implementation of Action Plan measures on a weekly basis to regulatory agencies and stakeholders.
Details/Findings:	Section 6 and Section 7 of the Action Plan that was submitted to the Ministry by MPMC on August 15, 2014 satisfied this requirement.
Compliance:	In
Actions to be taken:	
Requirement Description:	2014-08-05 PAO 8(a): Prepare and submit a formal written update by September 15, 2014. The update report is to include at a minimum: (a) A list of all other qualified professionals who contributed to the report, and a summary of their qualifications.
Details/Findings:	A letter that was sent from the Ministry to MPMC on June 15, 2015, deemed this requirement as complete.
Compliance:	In
Actions to be taken:	
Requirement Description:	2014-08-05 PAO 8(b): Prepare and submit a formal written update by September 15, 2014. The update report is to include at a minimum: (b) A summary of the preliminary EIA and results.
Details/Findings:	A letter that was sent from the Ministry to MPMC on June 15, 2015, deemed this requirement as complete.
Compliance:	In
Actions to be taken:	

Requirement Description:	2014-08-05 PAO 8(c): Prepare and submit a formal written update by September 15, 2014. The update report is to include at a minimum: (c) A summary of the comprehensive EIA and results.
Details/Findings:	A letter that was sent from the Ministry to MPMC on June 15, 2015, deemed this requirement as complete.
Compliance:	In
Actions to be taken:	
Requirement Description:	2014-08-05 PAO 8(e): Prepare and submit a formal written update by September 15, 2014. The update report is to include at a minimum: (e) A description of clean up activities, mitigation measures, site restoration and management actions that were implemented as a result of the preliminary and comprehensive EIA.
Details/Findings:	A letter that was sent from the Ministry to MPMC on June 15, 2015, deemed this requirement as complete.
Compliance:	In
Actions to be taken:	
Requirement Description:	2014-08-05 PAO 8(f): Prepare and submit a formal written update by September 15, 2014. The update report is to include at a minimum: (f) Recommendations for additional mitigation and restoration measures, if appropriate, and.
Details/Findings:	A letter that was sent from the Ministry to MPMC on June 15, 2015, deemed this requirement as complete.
Compliance:	In
Actions to be taken:	
Requirement Description:	2014-08-05 PAO 8(g): Prepare and submit a formal written update by September 15, 2014. The update report is to include at a minimum: (g) A proposed ongoing monitoring program.
Details/Findings:	A letter that was sent from the Ministry to MPMC on June 15, 2015, deemed this requirement as complete.
Compliance:	In
Actions to be taken:	
Requirement Description:	2015-02-20 PAO Clarification Letter (a)(i): The post-event impact assessment report must include: (i) Information collected as part of the Mount Polley Comprehensive Environmental Impact Assessment Work Plan, dated August 29, 2014.
Details/Findings:	All information collected as part of the Comprehensive Environmental Impact Assessment (CEIA) Work Plan, dated August 29, 2014 was included in the PEEIAR v1 with the exception of the Archaeology Reports. The Archaeology Reports were filed with the Ministry of Forest, Lands and Natural Resource Operations (FLNRO) and with the relevant First Nations.
Compliance:	In
Actions to be taken:	

Requirement Description:	2015-02-20 PAO Clarification Letter (a)(ii): The post-event impact assessment report must include: (ii) Have addressed Provincial agency comments submitted in writing to Mount Polley Mine Corporation, dated September 15, 2014.
Details/Findings:	MPMC submitted responses to Provincial agency comments in a summary table dated February 9, 2016.
Compliance:	In
Actions to be taken:	
Requirement Description:	2015-02-20 PAO Clarification Letter (a)(iii): The post-event impact assessment report must include: (iii) Incorporate all available baseline/background data and compared to monitoring data results.
Details/Findings:	All available baseline/background data was compared to monitoring data results in the Technical Appendices contained within the PEEIAR v1 Report.
Compliance:	In
Actions to be taken:	
Requirement Description:	2015-02-20 PAO Clarification Letter (a)(iv): The post-event impact assessment report must include: (iv) A comparison of how soil assessments compare to Contaminated Sites Technical Guidance #1 and if there are deviations, provide rationalization for the deviation and an evaluation of the approach, and.
Details/Findings:	A comparison of how soil assessments compared to the Contaminated Sites Technical Guidance #1 was included in the PEEIAR v2 Report that was submitted on May 30, 2016.
Compliance:	In
Actions to be taken:	
Requirement Description:	2015-02-24 PAO Additional Clarification (a)(v): The post-event impact assessment report must include: (v) a detailed site investigation under the Contaminated Sites Regulation.
Details/Findings:	The Detailed Site Investigation (DSI) was submitted to the Ministry on February 15, 2017. An email dated April 6, 2016 from Hubert Bunce to MPMC indicated that while the Ministry will not be designating the Mount Polley site as a formal contaminated site under the BC CSR, there will be a similar approach and process including the development of a DSI and Risk Assessments.
Compliance:	In
Actions to be taken:	
Requirement Description:	2015-02-20 PAO Clarification Letter (b): Work under section (a)(iv) and (a)(v) must be performed by a contaminates sites approved professional.
Details/Findings:	The Detailed Site Investigation was submitted to the Ministry on February 15, 2017. The work under section (a)(iv) and (a)(v) was performed by Reidar Zapf-Gilje who currently holds his Contaminated Sites Approved Professional (CSAP) designation.
Compliance:	In
Actions to be taken:	

Requirement Description:	2015-02-24 PAO Additional Clarification (c): A description of additional post-event impact assessments that will be submitted and proposed schedule for when the additional assessment reports will be submitted. These may include, but are not limited to: -Final geochemical characterization of tailings and soils. -Vegetation sampling and plant exposure and uptake of contaminants. -Benthic community sampling; habitat impacts; zooplankton community. -Follow-up sampling for phytoplankton and chlorophyll a. -Human health and ecological risk assessment. -Benthos impacts, and. -Habitat offsets.
Details/Findings:	Superseded by the PAO Letter Amendment that was sent from the Ministry to MPMC on May 27, 2015.
Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	2015-02-20 PAO Clarification Letter (d): Consider the "Policy for Mitigating Impacts on Environmental Values (Environmental Mitigation Policy)" and submit an overview as to how the policy will be applied to the impacted areas of Polley Lake, Hazeltine Creek and Quesnel Lake.
Details/Findings:	MPMC submitted a letter dated July 15, 2015 containing an overview as to how the Environmental Mitigation Policy will be applied to the impacted areas of Polley Lake, Hazeltine Creek and Quesnel Lake.
Compliance:	In
Actions to be taken:	
Requirement Description:	2015-05-27 PAO Amended 1.0 Post-Event Impact Assessment Report: (a): The Post-Event Environmental Impact Assessment Report must be submitted by June 5th, 2015.
Details/Findings:	The PEEIAR v1 Report was submitted to the Ministry on June 5, 2015.
Compliance:	In
Actions to be taken:	
Requirement Description:	2015-05-27 PAO Amended 1.0:Post-Event Impact Assessment Report: (b): Additional post-event impact assessments must be submitted. These include, but are not limited to: -Vegetation sampling and plant exposure and uptake of contaminants. -Benthic community sampling. -Habitat impacts (i.e. lake bottom, creek habitat and terrestrial riparian areas) -Zooplankton community. -Follow-up sampling for phytoplankton and chlorophyll a. -Benthos impacts.
Details/Findings:	The PEEIAR v1 Report included post-event impact assessments for: Vegetation sampling and plant exposure and uptake of contaminants, Benthic community sampling, Habitat impacts (i.e. lake bottom, creek habitat and terrestrial riparian areas), Zooplankton community, Follow-up sampling for phytoplankton and chlorophyll a. and Benthos impacts within Appendix G: Lake Productivity and Lower Trophic Tissue Metal Analysis, Appendix H: Quesnel and Polley Lakes Aquatic Productivity Impact Assessment, and Appendix G and Appendix H of the Mount Polley Tailings Dam Failure Sediment Quality Impact Characterization report prepared by Minnow Environmental Inc. (Appendix F of the PEEIAR v1 Report).
Compliance:	In

Actions to be taken:	
Requirement Description:	2015-05-27 PAO Amended 1.0.Post-Event Impact Assessment Report: (c): For the additional work undertaken in (b), provide progress reports submitted annually to the Director with the first one due December 31, 2015.
Details/Findings:	Rescinded as per the Letter Amendment that was sent from the Ministry to MPMC on December 30, 2016.
Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	2015-05-27 PAO Amended 2.0.: Delineation of Mine Affected Material and Sediment: (a): Include, in the annual report referenced in Section 1.0 (c) of this Order, a report delineating the extent of mine affected materials and sediment in the environment.
Details/Findings:	Delineation of mine affected material and sediment can be found within the PEEIAR v1 Report under section 3.1.6 Delineation of the area affected by the event.
Compliance:	In
Actions to be taken:	
Requirement Description:	2015-05-27 PAO Amended 3.0: Reporting: Maintain water sample analysis, flow measurements and water balance, quality assurance data and field measurement data collected in accordance with the 2015 Post TSF-Breach Monitoring Plan and subsequent Post TSF-Breach annual monitoring plans, for inspection and submit the data, suitably tabulated (for submission to the provincial EMS as noted below), to Director Environmental Protection, once every three months. All reports must be submitted within 45 days of the end of the three month period during which the data was collected. The sample analysis data and field measurement data must be submitted in an electronic format suitable for entry into the provincial database system known as EMS. The first report must be submitted by August 15, 2015
Details/Findings:	This requirement is no longer applicable because it was rescinded by PAO Letter Amendment, dated January 19, 2017.
Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	2015-05-27 PAO Amended 4.0: Additional Provisions: (a): Every requirement of this Order must be carried out to the satisfaction of the Director.
Details/Findings:	This requirement is no longer applicable because it was rescinded by PAO Letter Amendment, dated January 19, 2017.
Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	2015-05-27 PAO Amended 4.0: Additional Provisions: (b): Subject to the conditions at the site, the Director may require additional action, as deemed necessary by the Director, to protect human health and the environment.
Details/Findings:	This requirement is no longer applicable because it was rescinded by PAO Letter Amendment, dated January 19, 2017.

Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	2015-06-15 PAO Requirements a.: I require that you provide a written update to the above action plan that includes how Mount Polley Mining Corporation: The update to the action plan is required by July 15 2015. (a) Will achieve turbidity at the monitoring sites QUL54, QUL55, QUL56 of no greater than 2 NTU rolling average above background, at any monitored depth, over a period of 30 days using a minimum of 5 weekly samples.
Details/Findings:	The update to the Action Plan was provided to the Ministry on July 15, 2015 outlining how MPMC intended to achieve turbidity at the monitoring sites QUL54, QUL55, QUL56 of no greater than 2 NTU rolling average above background, at any monitored depth, over a period of 30 days using a minimum of 5 weekly samples.
Compliance:	In
Actions to be taken:	
Requirement Description:	2015-06-15 PAO Requirements b.: I require that you provide a written update to the above action plan that includes how Mount Polley Mining Corporation: The update to the action plan is required by July 15 2015. (b) Will achieve turbidity at the monitoring site QUL 18 of no greater than 1 NTU above background at any monitored depth.
Details/Findings:	The update to the Action Plan was provided to the Ministry on July 15, 2015 outlining how MPMC intended to achieve turbidity at the monitoring site QUL 18 of no greater than 1 NTU above background at any monitored depth.
Compliance:	In
Actions to be taken:	
Requirement Description:	2015-06-15 PAO Requirements c.: I require that you provide a written update to the above action plan that includes how Mount Polley Mining Corporation: The update to the action plan is required by July 15 2015. (c) Will consider the Environmental Mitigation Policy, including applicable guidelines and protocols, when determining mitigation/offsets for residual impacts to the environment when presenting them for consideration by Ministry of Environment and other stakeholders.
Details/Findings:	The update to the Action Plan was provided to the Ministry on July 15, 2015 outlining how MPMC considered the Environmental Mitigation Policy, including applicable guidelines and protocols, when determining mitigation/offsets for residual impacts to the environment when presenting them for consideration by Ministry of Environment and other stakeholders.
Compliance:	In
Actions to be taken:	
Requirement Description:	2015-06-15 PAO Requirements d.: I require that you provide a written update to the above action plan that includes how Mount Polley Mining Corporation: The update to the action plan is required by July 15 2015. (d) Will provide a schedule of submission dates for the plan or plans to recover or manage the mine affected materials and sediment in the receiving environment.
Details/Findings:	The update to the Action Plan was provided to the Ministry on July 15, 2015 outlining how MPMC intended to provide a schedule of submission dates for the plan or plans to recover or manage the mine affected materials and sediment in the receiving environment.
Compliance:	In
Actions to be taken:	

Requirement Description:	2015-06-15 PAO Requirements e.: I require that you provide a written update to the above action plan that includes how Mount Polley Mining Corporation: The update to the action plan is required by July 15 2015. (e) Will complete a human health and ecological risk assessment containing a conceptual exposure model, and define when the risk amendments and conceptual model will be provided.
Details/Findings:	The update to the Action Plan was provided to the Ministry on July 15, 2015 by MPMC containing a written update regarding the completion of a human health and ecological risk assessment containing a conceptual exposure model, and defined when the risk amendments and conceptual model will be provided.
Compliance:	In
Actions to be taken:	
Requirement Description:	2015-12-18 PAO Amended 1.0: Post Event Impact Assessment Report: V2: The first additional Post-Event Environmental Impact Assessment Report must be submitted by April 29th, 2016 with a draft provided for review by February 29th, 2016.
Details/Findings:	This requirement is no longer applicable because it was rescinded by PAO Letter Amendment, dated April 27, 2016.
Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	2015-12-18 PAO Amended 2.0: Delineation of Mine Affected Material and Sediment: Provide the report delineating the extent of mine affected materials and sediment in the environment by January 15 2016. The delineation report must include a series of maps, one for each media (water, sediment, invertebrate, fish, etc.) sampling set locating all samples taken for that media as they relate to the delineation of the spill impacted areas and including the data table of the associated media sampling that indicates sampling results, dates and rationale for their location.
Details/Findings:	This requirement is no longer applicable because it was rescinded by PAO Letter Amendment, dated January 15, 2016.
Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	2015-12-18 PAO Amended 3.0. Additional Provisions: (a): Every requirement of this Order must be carried out to the satisfaction of the Director.
Details/Findings:	Superseded by the Letter Amendment that was sent from the Ministry to MPMC on January 19, 2017.
Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	2015-12-18 PAO Amended 3.0. Additional Provisions: (b): Subject to the conditions at the site, the Director may require additional action, as deemed necessary by the Director, to protect human health and the environment.
Details/Findings:	Superseded by the Letter Amendment that was sent from the Ministry to MPMC on January 19, 2017.
Compliance:	Not Applicable

Actions to be taken:	
Requirement Description:	2016-01-15 PAO Amended 1.0: Delineation of Mine Affected Material and Sediment: (a): Provide the report delineating the extent of mine affected materials and sediment in the environment by January 31 2016. The delineation report must include a series of maps, one for each media (water, sediment, invertebrate, fish, etc.) sampling set locating all samples taken for that media as they relate to the delineation of the spill impacted areas and including the data table of the associated media sampling that indicates sampling results, dates and rationale for their location.
Details/Findings:	The PEEIAR v2 Report contained maps and tables within Appendix B: Soil Quality, Appendix C: Groundwater Quality, Appendix D: Surface Water Quality, Appendix E: Sediment Quality, Appendix F: Toxicology and Benthic Invertebrate Tissue Metal Analysis, Appendix G: Lake Productivity and Lower Trophic Tissue Metal Analysis, Appendix H: Fish Tissue Metal Analysis and Appendix J: Terrestrial Plant and Invertebrate Tissue Metal Analysis.
Compliance:	In
Actions to be taken:	
Requirement Description:	2016-01-15 PAO Amended 2.0: Additional Provisions: (a): Every requirement of this Order must be carried out to the satisfaction of the Director.
Details/Findings:	Superseded by the Letter Amendment that was sent from the Ministry to MPMC on January 19, 2017.
Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	2016-01-15 PAO Amended 2.0: Additional Provisions: (b): Subject to the conditions at the site, the Director may require additional action, as deemed necessary by the Director, to protect human health and the environment.
Details/Findings:	Superseded by the Letter Amendment that was sent from the Ministry to MPMC on January 19, 2017.
Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	2016-04-27 PAO Amended 1.0. Post-Event Impact Assessment Report: (a): The second version of the Post-Event Environmental Impact Assessment Report must be submitted by May 30, 2016.
Details/Findings:	The PEEIAR v2 Report was submitted to the Ministry on May 30, 2016.
Compliance:	In
Actions to be taken:	
Requirement Description:	2016-04-27 PAO Amended 2.0. Additional Provisions: (a): Every requirement of this Order must be carried out to the satisfaction of the Director.
Details/Findings:	This requirement is no longer applicable because it was rescinded by PAO Letter Amendment, dated January 19, 2017.
Compliance:	Not Applicable

Actions to be taken:	
Requirement Description:	2016-04-27 PAO Amended 2.0. Additional Provisions: (b): Subject to the conditions at the site, the Director may require additional action, as deemed necessary by the Director, to protect human health and the environment.
Details/Findings:	This requirement is no longer applicable because it was rescinded by PAO Letter Amendment, dated January 19, 2017.
Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	2016-07-15 PAO Amended 1.0: Human Health and Ecological Risk: Further to discussions held with Mt. Polley Mining Corporation and environmental consultants to both Ministry of Environment and MPMC in Vancouver March 4, 2016 this letter will confirm that it was agreed that the submission of the Human Health and Ecological Risk Assessments as required under Pollution Abatement Order 107461 be postponed to November 30 2016 based on the need for additional input to the related problem formulation, the detailed site investigation and the collection of additional sampling data over the 2016 monitoring season. This revised submission deadline was reviewed with the Williams Lake and Soda Creek Indian Band representatives and, considering the above was determined to be acceptable.
Details/Findings:	This requirement is no longer applicable because it was rescinded by PAO Letter Amendment, dated November 30, 2016.
Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	2016-11-30 PAO Amended 1.0: Human Health Risk Assessment: Further to discussions this fall with Mt Polley Mining Corp. (MPMC) and consultants working on behalf of MPMC, Ministry of Environment and the Williams Lake and Soda Creek Indian Band's it has been determined that in order to allow for submission of a more comprehensive Human Health Risk Assessment the deadline for submission noted in a letter of July 15 2016 is hereby postponed from November 30 2016 to January 31, 2017. The requirement to complete a Human Health Risk Assessment is in partial fulfillment of Section 7(d) of Order 107461.
Details/Findings:	A draft HHRA Report was submitted to the Ministry on January 31, 2017.
Compliance:	In
Actions to be taken:	
Requirement Description:	2016-11-30 PAO Amended 2.0: Ecological Risk Assessment: Further to discussions this fall with Mt Polley Mining Corp. (MPMC) and consultants working on behalf of MPMC, Ministry of Environment and the Williams Lake and Soda Creek Indian Band's it has been determined that in order to allow for submission of a more comprehensive Ecological Risk Assessment (including risk assessments for each of the impacted terrestrial and aquatic environments) the deadline for submission noted in a letter of July 15 2016 is hereby postponed from November 30 2016 to March 31, 2017. The requirement to complete a Ecological Risk Assessment is in partial fulfillment of Section 7(d) of Order 107461.
Details/Findings:	This requirement is no longer applicable because it was rescinded by PAO Letter Amendment, dated January 19, 2017.
Compliance:	Not Applicable

Actions to be taken:	
Requirement Description:	2016-11-30 PAO Amended 3.0 Reporting: Section 7(e) of this Order requires the weekly reporting to regulatory agencies on the implementation of measures outlined in the Action Plan originally submitted August 15 2016. Considering the reduced rate of change in conditions under the Action Plan this reporting requirement is hereby reduced to once per month by the end of each month.
Details/Findings:	This requirement is no longer applicable because it was rescinded by PAO Letter Amendment, dated January 19, 2017.
Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	2016-11-30 PAO Amended 4.0: Additional Provisions: [a]: Every requirement of this Order must be carried out to the satisfaction of the Director.
Details/Findings:	This requirement is no longer applicable because it was rescinded by PAO Letter Amendment, dated January 19, 2017.
Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	2016-11-30 PAO Amended 4.0: Additional Provisions: [b]: Subject to the conditions at the site, the Director may require additional action, as deemed necessary by the Director, to protect human health and the environment.
Details/Findings:	This requirement is no longer applicable because it was rescinded by PAO Letter Amendment, dated January 19, 2017.
Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	2016-12-30 PAO Amended 1.0: Post-Event Impact Assessment Report: This amendment rescinds the requirement for submission of an annual PEEIAR. The monitoring and reporting previously required under this Order will now be included as part of the annual Comprehensive Environmental Monitoring Plan (CEMP) and the associated Annual Reporting required under section 3.2 and section 3.9 respectively of Environmental Management Act Permit 11678 (issued Sept. 19, 2016).
Details/Findings:	A draft copy of the annual Comprehensive Environmental Monitoring Plan (CEMP) was submitted by MPMC on March 31, 2017.
Compliance:	In
Actions to be taken:	The Director must approve the annual CEMP. The Director may approve the CEMP with conditions, and may require revisions to the CEMP based on reviews of monitoring data and/or any other relevant information.
Requirement Description:	2016-12-30 PAO Amended 2.0: Additional Provisions: [a]: Every requirement of this Order must be carried out to the satisfaction of the Director.
Details/Findings:	This requirement is no longer applicable because it was rescinded by PAO Letter Amendment, dated January 19, 2017.
Compliance:	Not Applicable

Actions to be taken:	
Requirement Description:	2016-12-30 PAO Amended 2.0: Additional Provisions: [b]: Subject to the conditions at the site, the Director may require additional action, as deemed necessary by the Director, to protect human health and the environment.
Details/Findings:	This requirement is no longer applicable because it was rescinded by PAO Letter Amendment, dated January 19, 2017.
Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	2017-01-19 PAO Amended 1.0: Ecological Risk Assessment: Further to submissions from Mount Polley Mining Corp. (MPMC) and consultants working on behalf of MPMC, dated January 6, 2017 it has been determined that in order to allow for submission of a more comprehensive Ecological Risk Assessment (including risk assessments for each of the impacted terrestrial and aquatic environments) the deadline for submission is hereby amended from March 31, 2017 to April 30, 2017. The requirement to complete an Ecological Risk Assessment is in partial fulfillment of Section 7(d) of Order107461.
Details/Findings:	This requirement is no longer applicable as it was rescinded due to a discussion/agreement between the Ministry and MPMC during the February 14, 2017 meeting. The new submission date for the Draft Ecological Risk Assessment is April 30, 2017, with the Final document being due June 30, 2017.
Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	2017-01-19 PAO Amended 2.0: Reporting: Section 7 e) of this Order requires the monthly reporting to regulatory agencies, First Nations and stakeholders on the implementation of measures outlined in the Action Plan originally submitted August 15, 2014. In addition to monthly reporting, MPMC must maintain water sample analysis, flow measurements and water balance, quality assurance data and field measurement data collected in accordance with the 2015 Post TSF-Breach Monitoring Plan and subsequent Post TSF-Breach annual monitoring plans, for inspection and submit the data, suitably tabulated (for submission to the provincial EMS as noted below), to Director, once every three months. All reports must be submitted within 45 days of the end of the three month period during which the data was collected. The sample analysis data and field measurement data must be submitted in an electronic format suitable for entry into the provincial database system known as EMS. A copy of the quarterly reports, and all other reports required to be submitted as a condition of this Order, must be provided to all regulatory agencies, First Nations and stakeholders within 15 days of submission to the Director. Regulatory agencies, First Nations, and stakeholders must include the following: Ministry of Energy and Mines; Forests, Lands and Natural Resource Operations; Environment Canada; Fisheries and Oceans Canada; Xatsill First Nation, Williams Lake Indian Band, Lhtako First Nation, Tsilhqot'in National Government, Cariboo Regional District, and Likely and District Chamber of Commerce.
Details/Findings:	As per the email sent from Leslie Payette on February 2, 2017 it states that there is no longer a requirement to submit any Post TSF Breach monitoring plans and that the monitoring in accordance with the CEMP that is reported quarterly to the Director satisfies the reporting requirement for the PAO. Monthly reporting to regulatory agencies, First Nations and stakeholders on the implementation of measures outlined in the Action Plan remains in effect.
Compliance:	In
Actions to be taken:	Ongoing.

Requirement Description:	2017-01-19 PAO Amended 3.0: Additional Provisions: (a): Every requirement of this Order must be carried out to the satisfaction of the Director.
Details/Findings:	The Director has not required additional action at the site, as deemed necessary by the Director, to protect human health and the environment. Therefore, this requirement is not applicable, but remains in effect.
Compliance:	Not Applicable
Actions to be taken:	
Requirement Description:	2017-01-19 PAO Amended 3.0: Additional Provisions: (b): Subject to the conditions at the site, the Director may require additional action, as deemed necessary by the Director, to protect human health and the environment.
Details/Findings:	The Director has not required additional action at the site, as deemed necessary by the Director, to protect human health and the environment. Therefore, this requirement is not applicable, but remains in effect.
Compliance:	Not Applicable
Actions to be taken:	

On April 3, 2017, Ministry of Environment, Environmental Protection Division staff, completed an Office Review inspection of Mount Polley Mining Corporation (MPMC), Pollution Abatement Order 107461 (Order); dated August 5, 2014. The review was limited to a desktop analysis of the Order and any amendments made to the Order between August 5, 2014 and January 19, 2017.

A meeting was held between MPMC and the Ministry of Environment (Ministry) on February 14, 2017 in Vancouver, BC, to confirm submission dates and Order deliverables. In attendance from the Ministry was Leslie Payette (Operations Manager), Connor Fraleigh (Environmental Protection Officer) and Colin Meldrum (Senior Environmental Protection Officer). In attendance representing MPMC was Don Parsons (Imperial Metals), Lyn Anglin (Imperial Metals), Colleen Hughes (MPMC) and Lee Nikl (Golder Associates).

Reviewed was the Order, issued August 5, 2014;
an Order clarification letter, dated February 20, 2015;
an Order clarification letter, dated February 24, 2015;
an Order letter amendment, dated May 27, 2015;
an Order letter amendment, dated June 15, 2015;
an Order letter amendment, dated December 18, 2015;
an Order letter amendment, dated January 15, 2016;
an Order letter amendment, dated April 27, 2016;
an Order letter amendment, dated July 15, 2016;
an Order letter amendment, dated November 30, 2016;
an Order letter amendment, dated December 30, 2016;
an Order letter amendment, dated January 19, 2017;
and associated data and correspondence.

The scope of this Office Review was to complete a detailed review of each Order requirement and determine which requirements have been satisfied to date. Following this inspection, the remaining Order requirements which have yet to be satisfied (as determined by the Ministry) will be incorporated into a new Order amendment.

As referenced above, the proposed report submission dates are as follows:

Human Health Risk Assessment: Draft submitted January 31, 2017, Final due April 28, 2017
Ecological Risk Assessment: Draft due April 30, 2017, Final due June 30, 2017

If you have any questions or concerns, please do not hesitate to contact me.

Please be advised that this inspection report will be published on the provincial government website in 7 days.

If you have any questions about this letter, please contact the undersigned.

Yours truly,

Connor Fraleigh
Environmental Protection Officer

cc: Dale Reimer
Don Parsons
Colleen Hughes
Lyn Anglin
Leslie Payette
Brady Nelles
Colin Meldrum

Attachments:

Deliver via:

Email: Fax: Mail:
Registered Mail: Hand Delivery:

Ministry of Environment

Compliance
Environmental
Protection Division

Mailing Address:
400-640 Borland St
Williams Lake BC V2G 4T1

Telephone: 250 398 4530
Facsimile: 250 398 4214
Website: www.gov.bc.ca/env

Ministry of EnvironmentCompliance
Environmental
Protection DivisionMailing Address:
400-640 Borland St
Williams Lake BC V2G 4T1Telephone: 250 398 4530
Facsimile: 250 398 4214
Website: www.gov.bc.ca/env**DISCLAIMER:**

Please note that sections of the permit, regulation or code of practice referenced in this inspection record are for guidance and are not the official version. Please refer to the original permit, regulation or code of practice.

To see the most up to date version of the regulations and codes of practices please visit

<http://www.bclaws.ca>

If you require a copy of the original permit, please contact the inspector noted on this inspection record or visit:

[http://www2.gov.bc.ca/gov/topic.page?id=DF89089126D042FD96DF5D8C1D8B1E41&title=Publically%20Viewable%20A
uthorizations](http://www2.gov.bc.ca/gov/topic.page?id=DF89089126D042FD96DF5D8C1D8B1E41&title=Publically%20Viewable%20A%20uthorizations)

It is also important to note that this inspection record does not necessarily reflect each requirement or condition of the authorization therefore compliance is noted only for the requirements or conditions listed in the inspection record.