14th Floor, Centre Tower
3300 Bloor Street West
Toronto, Ontario
Canada M8X 2X4
Tel.: 416.734.3300
Fax: 416.231.1626
Toll Free: 1.877.682.8772

www.tssa.org

September 3, 2021

MICHEL PAYEUR
IAMGOLD CORPORATION
2140 REGENT ST, UNIT 2
SUDBURY ON P3E 5S8
MICHEL_PAYEUR@IAMGOLD.COM

FS-LF Variance
Service Request No.: 3066990
Private Fuel Outlet
Installed at: HWY 144, CHESTER MINE RD, GOGAMA

Re: Variance from Clauses 1.3.1 & 5.6.1.10 of the Liquid Fuels Handling Code, O. Reg. 217/01

Dear MICHEL PAYEUR,

This is in response to your variance application:

1. To use an unapproved FloMAX FNBL-P fueling nozzle to bottom load trucks and fuel equipment; and
2. To use procedures and risk mitigation methods in lieu of an oil/water separator (temporary variance until December 31, 2021 for HR-6 facility).

Please be advised that your variance application has been approved because we have received the following information:

1. FloMAX FNBL Nozzle - The fleet of mining equipment is manufactured by Caterpillar and is equipped with 1.5-inch dry-break style connections suitable for use with FloMAX nozzles. The fill system is designed by Caterpillar so that the nozzle will stop automatically when the tank reaches its intended fill level. This is a standard fill system used by major construction/mining equipment manufacturers around the world. Fill connections for these tanks are located below the top of the tank at a safe and convenient height for the operator. There are no alternative fill locations or fill methods for these fuel tanks. A report signed by Andrew Gendre, P.Eng., comparing the FloMAX nozzle to the CAN/ULC-S620, the standard for hose nozzle valves for flammable and combustible liquids concludes that the FloMAX FNBL diesel fuel nozzle meets and exceeds the requirements and safety objectives listed in the CAN/ULC-S620:2016 standard.

2. Oil/Water Separator - Several features and risk mitigation measures exist to ensure that the refueling of the mobile tanker can be performed safely without an oil/water separator. These features are outlined below:

    a) The storage tanks are being placed inside tertiary containment berms to retain minor spills which may occur during offloading;

    b) During fueling, the operator remains within approximately 2 meters of the fuel connection and emergency stop device. This allows for an immediate operator response, in the event of a concern. Even in the unlikely event of a component failure, operator response will be very rapid to avoid a significant spill;

c) The refueling connection is a double dry-break connection so that, upon disconnection, the contents from the truck and the fueling couplings are contained. It is a standard operating requirement that the operator place a containment pan under the fuel connection during the connection, fueling process and disconnection of the truck. Any minor drips or spills during the connection process will be captured before reaching the ground in the fueling lane;

d) Fuel tanker overfill prevention will be ensured using a Scully Intellitrol system which is interlocked to ensure that the vehicle cannot be inadvertently overfilled. This equipment is the same as and meets the safety standards of fuel transfer equipment at major distribution terminals. Since the fueling trucks may not be fully emptied before they return to be loaded, an additional level of spill containment is being recommended, in the event of a spill. To provide additional tertiary containment against spills, the trucks will be positioned in a fueling lane when being loaded. This granular capped lane (approx. 16 ft W x 45 ft L) will be contained by a Petrogard VI fuel resistant liner (an engineered fabric that is compatible with petroleum product and is used in the industry to line dikes) with raised sides. The entrance/exit of the lane will be protected by fuel absorbent booms when the fuel trucks are being refilled;

e) The fuel facility is equipped with numerous global emergency stop devices (situated at all fueling locations) to immediately stop the flow of ALL fuel, in the event of a leak or spill. During the tanker refueling process, the operator procedure requires that the driver will remain in attendance at the fuel connection point which is within approx. 2 meters of an emergency stop device. This proximity will help ensure that the equipment can be immediately shut down to prevent any significant spill during the tanker refueling process; and

f) The fuel facility is equipped with a readily accessible spill containment kit, in the event of a leak or spill.

Please be advised that this variance will not take effect until 15 days from the date of posting the decision on the environmental registry. This decision of the Director is subject to a right of appeal, under the Environmental Bill of Rights, if such an appeal is filed within 15 days from date of posting. In the event an appeal is filed, this decision of the director may be subsequently stayed, disallowed or significantly altered. Notice of an appeal will be placed on the Environmental Bill of Rights registry.

This variance is allowed under the authority of subsection 36.(3)(c) of the *Technical Standards and Safety Act, 2000*, (the "Act") and subject to such conditions as may be specified herein, being that:

- The installation/system/appliance dealt with in this variance must be inspected and may be periodically audited by TSSA. Please contact Mike Sanford at 705-269-1269 or by email at msanford@tssa.org to arrange for an inspection;

- A breakaway valve shall be installed on all fuel hoses on which the FloMax nozzle is installed;

- Non-conformity with the conditions specified shall thereby cause the allowed variance to become null and void;

- The applicant accepts full responsibility for any and all damages resulting from the use of the thing to which the variance applies. The applicant further accepts full responsibility for any impacts to the health and safety of any person in consequence of the allowance of the variance or of non-conformity with the conditions specified. The Technical Standards and Safety Authority accepts no responsibility for any such damages or impacts;

- In the event of any claims against the Technical Standards and Safety Authority arising from allowance of the variance or non-conformity with the conditions specified, the applicant agrees to indemnify the Technical Standards and Safety Authority and agrees to hold it harmless from such claims and attendant costs;

- The variance process is subject to public access under the TSSA Access and Privacy Code (available upon request). The fact that a variance has been granted and information about any public conditions, such as a requirement to post a sign, may be released on request. Subject to law and the TSSA Access and Privacy Code, proprietary information will not be subject to release;

- The applicant shall pay the fee associated with the review of the variance; and

- A copy of the variance letter shall always be kept readily available and permanently legible in the vicinity of the appliance/equipment.

This variance only relates to the Act and regulations made thereunder and does not exempt you from compliance with other applicable regulatory requirements. The installation may be subject to an inspection to ensure compliance with the terms of the variance.

Should you have any questions or require further assistance, please contact Marek Kulik at 416-734-3465 or by email at mkulik@tssa.org. When contacting TSSA regarding this file, please refer to the Service Request number provided above.

Yours truly,

Zenon Fraczkowski

Zenon J. Fraczkowski, P. Eng.
Manager, Fuels Safety Engineering
Delegated Authority under section 36(3) (c) of TSS Act

c. Terry Ablett, Wagg's Petroleum Equipment Ltd., tablett@waggspetroleum.on.ca
Mike Sanford, TSSA, msanford@tssa.org
Guy Castagne, TSSA, gcastagne@tssa.org