



## Statement of Concerns and Mayor's Request for Feedback

March 3, 2023

Good Morning

As the development of the Manh Choh mine progresses, questions from the public arise from time to time concerning the impact of the operation on the community; and as detailed in this letter, questions specifically related to the highway transportation of the raw ore.

The City of Delta Junction has not taken an official position on any aspect of mine operations, as other communities have, but has received considerable public comment. The City Council has been requested by local and statewide entities to formulate an opinion on the Kinross transportation plan thus precipitating this *Mayor's Request for Feedback* from mine affiliates and State of Alaska agencies.

### 1. Environmental Impact of Fugitive Dust

**Kinross**

Fugitive dust will escape from these vehicles; accidents and spills could happen.

- **Are details available on the chemical constituents of the ore (cobalt, copper, molybdenum, silver, selenium, arsenic, antimony etc.)?**
  - *This is addressed in the answers below.*
- **Does the ore have any hazardous components or characteristics?**
  - *Typical of any mining-grade ore, there are a wide variety of constituents. Peak Gold's target constituents are primarily gold and secondarily silver. The ore has many other trace constituents although the composition is proprietary to Peak Gold's business interests. In solid state, the ore is highly stable so virtually no hazardous components will be released to the environment. The ore will not be crushed or treated prior to transport and loads will be covered.*
- **Are there any identified health risks associated with the fugitive dust?**
  - *No, there are no identified health risks with the fugitive dust. The elemental metals are bound chemically in the rock as a compound in a stable form. Crushing, which would occur in a very controlled mining environment at Fort Knox rather than Manh Choh, may expose these metals, but a chemical change would need to occur. The volume of dust leaving the trucks will be minimal, if any, as the uncrushed ore has very few fines, ore moisture content will suppress any fines, and the trailers will be covered.*

## 2. Special Order Trucks and Trailers, Fit for Use

Kinross

- **Is there any documentation concerning these ore trucks having been tested for use in arctic conditions, or is there an intent to do so?**
  - Yes, these trucks (T880 tractors) are currently operated in Alaska.
    - T880 tractors are currently being used in Alaska (approximately 250 T880 tractors have been sold in Alaska)
    - Sidump'r trailers are in operation in northern climates, including Alaska (approximately 130).
    - Kenworth and Sidump'r comply with all FMVSS (Federal Motor Vehicle Safety Standards), which include arctic condition operation.
  - Trial runs will be conducted prior to commencement of operations to validate equipment performance.

## 3. Shortage of Qualified LCV (Long Combination Vehicle) Truck Drivers Kinross

There is a perceived shortage of qualified LCV truck drivers in Alaska (indeed, nationwide), especially for winter driving conditions.

- February 2023 had a record drop in the last 6.5 years of freight shipping prices per the LMI (Logistic Managers Index). This indicates that demand for shipping has decreased, thus allowing for a surplus of qualified drivers.
- Black Gold Transport recruiting efforts to date have indicated a very high degree of interest in this project by qualified drivers both in-state and from the northern 48 states.
- **What assurances do we have that Black Gold will hire and retain qualified arctic drivers?**
  - The contracted company, Black Gold Transport, a trusted local company, will only hire drivers that have snow and ice driving experience. Recruiting efforts have been focused on Alaska as well as drivers from northern states that experience snowy and icy conditions. They will be providing industry leading benefits and work schedule package to maximize driver retention.
- **Will there be training and testing requirements?**
  - Yes, there will be training and testing requirements. Black Gold Transport drivers will have a Class A CDL with doubles endorsement and relevant experience including pulling combination vehicles in northern climates.
  - A project specific driver training program will be implemented which will include route specific safety training, mentoring, coaching and monitoring.
  - All drivers are subject to background checks.
  - All drivers are required to pass a pre-employment drug & alcohol screening and will be subject to random drug & alcohol screening tests.
- **Has it been determined that the ore will be non-hazardous for purposes of the CDL license and background checks?**
  - Yes, it has been determined that the ore is not hazardous, and a hazardous endorsement on the drivers CDL is not required.

## 4. Inclement Weather

**Kinross**

There is an existing regulation, 17 AAC 25.014(e) which states: During movements, a long combination vehicle must:

1) stop operations during inclement weather

Inclement weather is defined under 17 AAC 25.900(18):

(18) "inclement weather" means:

(A) fog, rain, or snow conditions that restrict visibility to less than 1,000 feet;

(B) wind conditions that render a vehicle unable to maintain directional control within one driving lane; or

(C) an accumulation of ice, snow, or freezing rain upon a roadway that renders a vehicle unable to maintain traction

Interpretation of this regulation is usually left up to the trucking company and the driver.

- ***Are Kinross and Black Gold willing to voluntarily commit to and strictly abide by the rules of 17 AAC 25.014(e).***
  - *Trucks will stop when conditions are unsafe to continue even if conditions are above the minimums described in 17 AAC 25.900(18).*

## 5. Bus Stops

**Kinross**

- ***What Kinross truck driving protocols, truck stopping distance standards, and school bus operations protocols are going to be put in place to accommodate the increase in truck traffic resulting from the Kinross ore haul?***
  - *The trucks will follow all laws and regulations and like all other vehicles on the road, will stop for bus stops, make way for emergency vehicles, and pull over to clear congestion when it is safe to do so.*
  - *Black Gold Transport drivers will receive route specific training including training on locations and timing of bus stops.*
  - *Truck dispatch will monitor locations of trucks at all times and will notify drivers if they are entering an area where bus stops are located during times that buses are scheduled to be picking up or dropping off students.*
  - *Black Gold Transport has reached out to the school districts and bus contractors and is working to establish a means to communicate between each group's dispatch team regarding bus locations, road condition updates, changes to timing or location of bus stops, and to share other pertinent information regarding the bussing operations.*
  - *Every axle on the truck and trailer will have disc brakes. Federal Motor Vehicle Safety testing demonstrates that trucks with all disc brakes stop in 30% less distance than trucks with standard drum braking systems.*

## 6. Ore Transportation Plan

**Kinross**

- *Is Kinross willing to present a complete written copy of their Ore Transportation Plan?*
  - *The ore transportation plan has been shared in multiple presentations at meetings with citizens and agencies. We are happy to share this presentation with your administration.*
- *Operations Safety Plan?*
- *Accident Contingency Plans?*
- *Spill Cleanup and Mitigation Plans?*
  - *The Operations Safety Plan, Accident Contingency Plan, and Spill Cleanup are all part of a comprehensive Transportation Safety Plan that is underway. This planning was initiated during the RFP process, and since the award of the contract to Black Gold Transport, details of the plan have continued to advance and will continue to be refined as the project matures. The project is very willing to share the contents of the Plan (most has already been shared in various presentations); however, the final detailed document is not available to the public.*

## 7. Liability Coverage

**Kinross**

- *What insurance does Kinross and affiliates have for highway spill clean-up?*
  - *Kinross and Black Gold Transport take their environmental commitments very seriously. Spills would be cleaned up in accordance with all regulations and taken to the appropriate facility for processing.*
  - *The trucking operation will have coverage that exceeds requirements set by law.*
  - *Black Gold has operated safely in Alaska since 1987*
    - *Throughout the 35-year history of the company's operation, their operating authority has remained in good standing.*
    - *Black Gold's historical incident/accident rate is below industry standards.*

*Thank you*

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