

Notice of Alteration Report

Clean Environment Act Order 960VC Concentrate Storage

Preface

This Notice of Alteration Report is submitted in support of a license alteration proposal allowing the (former) Copper Precipitate Storage Tent to be repurposed for the storage of Concentrate from the Thompson Concentrator, and to document and review any potential environmental impacts.

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1.0 Alteration Description

Currently, concentrate produced by the Thompson Complex is stored in the Thompson Concentrate Loadout Facility (TCLO) and the VBN building authorized under the Manitoba Clean Environment Act Order 960 VC and its alterations. With the planned repurposing of the Copper Precipitate Handling Tent to store concentrate, Vale will continue to adhere to the TCLO conditions within this approval.

Concentrate will be hauled by truck to the tent formerly used to store Copper Precipitate. All existing procedures for handling concentrate and all monitoring and mitigation strategies focused on the prevention and control of fugitive dust shall apply.

Figure 1 below provides an overview of the location of the tent.



Figure 1: Thompson Complex Site Plan



Figure 2 below provides a view of the Stockpile Storage Tent's interior.



Figure 2: Stockpile Storage Tent

2.0 Scope of Alteration

The scope of alteration will be repurposing the Storage Tent previously used to store Copper Precipitate, following the conclusion of the Copper Pond Project. Vale proposes using the Storage Tent for overflow storage of Nickel Concentrate produced by the Thompson Concentrator.

Storage capacity shall be limited to 8,954 tons (8,123 metric tonnes), the base dimensions shall not exceed 14,875 $\rm ft^2$, the top dimensions not more than 10,075 $\rm ft^2$ (1:2 slope) and the maximum height of the pile limited to five feet.

3.0 Summary of Potential Environmental Effects

Any potential impact from the scope of storing concentrate in the tent will be mitigated through design, best practices and existing Vale standards and procedures. In considering potential effects resulting from the proposed alterations, this was done in the context of effects from the existing development at Vale's Thompson operations and considered effects on the terrestrial, aquatic, and atmospheric environments. The alteration will not significantly change the environmental effects of the operations.

3.1 Health Effects

All applicable Vale health and safety policies and procedures including monitoring and mitigation will apply to Vale employees working inside the tent, per current practices for working in poor air quality environments. Any contractors retained to support handling of concentrate will further be required to implement health and safety programs intended to mitigate risk to workers.



Given the scope and history of the Thompson Complex, there is not believed to be any potential for health effects on the community or public resulting from this change.

3.2 Terrestrial Environment

The storage tent is located on previously disturbed land formerly used for concentrated material handling. There will be no new footprint needed to support this change.

3.3 Aquatic Environment

All effluent discharged through the final discharge point; Area 5 Weir of the Thompson Complex's Tailings Storage Facility which receives run off from the site will continue to adhere to the discharge limits specified in Clean Environment Act Order 960 VC. Sampling and analyses, as well as reporting, will continue in accordance with the approval. There is then anticipated to be no change in effluent water quality.

3.4 Atmospheric Environment

There are no expected changes to the air emissions profile from the Thompson Complex. Fugitive dust emissions are controlled by ensuring that moisture content is between 6-10%, that the established procedures for handling are applied at this new location, and that monitoring and mitigation measures (in effect at the TCLO and the VBM facilities) are applied to prevent and control track out.

3.5 Noise

There will be no new noise-generating equipment required.

3.6 Potential for Community Impact

There are no material changes to land use, effluent quality, air quality or noise emissions locally or that may impact the neighboring City of Thompson because of the change.

3.7 Closure

No update to the Closure Plan is required. The plan is updated at a regular frequency where changes to the scope of the operation are captured.

4.0 Conclusion

Vale trusts that the preceding report meets the requirements in published guidance to provide a detailed description of the proposed changes to the development as licensed and to describe any potential environmental effects (specifically including consideration for effects on the terrestrial, aquatic, and atmospheric environments) and human health effects from the alteration. It is Vale's assessment that there will be no significant adverse effects from the proposed alterations.

Attached Appendices:

• Vale, 2025, Storage Tent Capacity Assessment



