

*Acid Rock Drainage and Metal
Leachate Management Plan – Water
Quality Annual Report:
January 1 to December 31, 2025*

*Site C Clean Energy Project
March 31, 2026*

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Appendix C – Site C Clean Energy Project Water Quality Monitoring for Shale Rock Cuts and Other Occurrences 2025 Annual Report (Tetra Tech)

Acronyms

ABA	acid base accounting
AFDE	Aecon, Flatiron, Dragados, and EBC
AG	Acid Generating
ARD/ML	acid rock drainage/metal leaching (or leachate)
BCWQG	British Columbia Water Quality Guidelines for Protection of Aquatic Life
CEMP	construction environmental management plan
CVC	conventional vibrated concrete
DOC	diversion outlet cofferdam
DT	diversion tunnel outfall
DTIP	diversion tunnel inlet portal
DTOP	diversion tunnel outlet portal
EAC	Environmental Assessment Certificate
EOP	end of pipe (in relation to discharge limits)
EPP	environmental protection plan
IDZ	initial dilution zone
IEM	Independent Environmental Monitor
LB	left bank (of the Peace River, when facing downstream)
LBCD	left bank cofferdam
LBDA	left bank drainage adit
LBDT	left bank drainage tunnel
LBEX	left bank excavation
MCW	main civil works
Non-PAG/NPAG	non-potentially acid generating
PAG	potentially acid generating
PMQ	Portage Mountain Quarry
PRHP	Peace River Hydro Partners
RB	right bank (of the Peace River, when facing downstream)
RBDT	right bank drainage tunnel
RCC	roller compacted concrete
RSEM	relocated surplus excavated materials (area)
SBIAR	south bank initial access road
TSS	total suspended solids
QP	Qualified Professional

WTF

mobile water treatment facility

1. ACID ROCK DRAINAGE AND METAL LEACHATE MANAGEMENT PLAN

1.1 Background and Reporting Requirements

The Acid Rock Drainage and Metal Leachate Monitoring Plan has been developed in accordance with the following regulatory conditions:

- Condition 7 of the Site C Project's Federal Decision Statement, issued to BC Hydro on October 14, 2014 and re-issued November 25, 2014, which requires BC Hydro to:
 - "...develop, in consultation with Environment Canada and Natural Resources Canada, a water quality management plan to address environmental effects to the aquatic environment from the Designated Project, including acid rock drainage and metal leaching."
- Condition 3 of the Site C Project's Environmental Assessment Certificate, (EAC #E14-02), issued to BC Hydro on October 14, 2014, which requires BC Hydro to:
 - "... develop a water quality monitoring program, [which] must be detailed in the Acid Rock Drainage and Metal Leachate Management Plan."

The Site C Project's Construction Environmental Management Plan (CEMP; Revision 12 dated October 23, 2023), Appendix E – Acid Rock Drainage and Metal Leachate Management Plan (Version 6.1, October 4, 2023) fulfills the requirements of the water quality management plan referenced in the above conditions.

This update satisfies the annual reporting requirements specified by these conditions, covering the reporting period from January 1 to December 31, 2025.

We acknowledge this work is being conducted on the traditional territory of Treaty 8 First Nations of Dunne Zaa, Cree and Tse'khene cultural descent.

2. OVERVIEW OF SITE ACTIVITIES IN 2025

2.1 General Description of Site Activities

On August 25, 2024, Site C reservoir filling began, and the first turbine came into operation on October 28, 2024; the subsequent units came into service over the following months until the sixth and final generating unit came online on August 9, 2025, marking the start of full operations.

The location of construction areas and water management structures relevant to ARD/ML material management are described below. On the dam site, the areas are categorized per their location on the Right (south) Bank or Left (north) bank of the Peace River, and are listed by excavation site, followed by permanent storage facility. Complete details of the site activities related to ARD/ML, should be referenced in the attached appendices.

2.2 Environmental Protection Plans (EPPs)

Each construction area is required to have a BC Hydro approved environmental protection plan (EPP) which describes ARD/ML mitigation and management plans relevant to the site work as per Appendix E of the CEMP. A chance find procedure is included in the EPP document where exposure or disturbance of bedrock is not anticipated as part of the construction activities. As of December 31, 2025 (cumulatively since the start of project construction), 2266 EPPs (including revisions) have been reviewed by BC Hydro covering all contractors and scopes of work. In the calendar year 2025, 67 of these EPPs (including revisions) were submitted to and reviewed by BC Hydro. Implementation of these plans is the responsibility of site contractors, and is overseen by BC Hydro, the Independent Environmental Monitor (IEM) and ARD/ML Qualified Professionals (QPs).

2.3 ARD/ML Mitigation Hierarchy

The baseline geochemical characterization of bedrock determined that all bedrock units that will be disturbed by dam site construction activities are PAG (KCB, 2015). This report specifies that bedrock should be assumed to be PAG or AG, unless direct sampling and analyses determine otherwise. ARD/ML monitoring is recommended for areas where bedrock is excavated and where these materials are stored.

Mitigation measures implemented to minimize exceedances of discharge limits due to ARD/ML include material management (e.g. excavating or covering bedrock exposure), water management to contain water that may be influenced by ARD/ML, and water treatment to neutralize pH and remove total and dissolved metals.

The primary mitigation strategy for ARD/ML is material management to limit exposure of PAG material and the generation of PAG contact water that may trigger the implementation of additional water management. Weathered material that has been exposed for several months and is becoming acidic is monitored to determine when mitigation is required. PAG bedrock monitoring is discussed in Section 2.4. In addition, material that is placed in RSEM disposal areas is monitored, and weathered material is covered with recently excavated bedrock or overburden. The majority of PAG and AG material will be stored within the future reservoir footprint. This is to slow reaction rates, and ARD/ML to minimal levels once the material is permanently submerged in the reservoir.

The secondary mitigation strategy is water management, including diversion of non-contact runoff from above the project to bypass the construction site, such as Garbage Creek, and retaining as much contact water as possible within the site. Water that must be released is directed to RSEM sediment control ponds or monitored and discharged from the associated rock cut location, from where it is discharged to the Peace River. The construction of two pipelines to facilitate the pumping of R5B Phase 2 Sump water during MCW construction to RSEM R5A Pond A, the RSEM R6 ponds or to the water treatment plant (WTP) greatly improved the water management system at site and decreased the risk of discharging non-compliant water to the Peace River.

The tertiary mitigation strategy is water treatment, wherein contact water not anticipated to meet end of pipe (EOP) discharge limits is conveyed to the WTP which is positioned at RSEM Area R6 and discharges treated effluent through a series of sludge settling cells and ultimately to the RSEM R6W sediment pond.

The implementation of various erosion and sediment control measures at site has reduced the frequency of TSS-related exceedance of EOP discharge limits from RSEM Area sediment ponds since the monitoring program was initiated in autumn 2016.

2.3.1 Sediment Monitoring

Section 7.2.4 of the Acid Rock Drainage and Metal Leachate Management Plan (CEMP, Appendix E) addresses the testing and disposal of accumulated sediment from a PAG contact sediment control pond. It states the following:

“If the Contractor must remove accumulated sediment from a PAG contact sediment pond, the Contractor shall test the sediment for metals and hydrocarbon to ensure it meets the regulated limits for the site where that accumulated sediment will be deposited.”; and,

“Prior to decommissioning or infilling of the PAG contact sediment pond, the contractor shall test the sediment for metals and hydrocarbon to ensure it meets the regulated limits.”

The accumulated sediment at the bottom of sediment control ponds that may be removed by dredging is referred to as dredgeate.

2.3.2 Upper River Road Shale Slope and Cut-Off Ditch

Construction of the long-term ARD/ML mitigation covers for the Upper River Road shale slope and Cut-Off ditch were started in November 2024 and was completed in mid-March 2025.

The long-term ARD-ML mitigation measure for the Upper River Road shale slope consists of a cover system that includes an impermeable geomembrane liner overlain by a cellular confinement system. The impermeable liner prevents oxygen and water ingress into the shale surface, thereby eliminating ARD-ML reactions once the cover is in place. The purpose of the cellular confinement system is to protect the liner from UV light degradation and physical damage, such as abrasion and puncture, and create a traversable surface primarily for wildlife. The extents of the cover system were supported by field rinse pH tests to define areas of active acid generation, and to confirm depth of scraping on the slope prior to cover placement. The shale slope was prepared prior to placement of the geosynthetic materials. The portion of the slope representing the footprint of the cover system design was excavated to remove actively acid generating shale material and create a level surface for the geomembrane liner.

Detailed design of a similar cover system for the Lower River Road shale slopes is completed, and construction is expected to take place in Spring 2026.

2.3.3 South Bank Initial Access Road

The South Bank Initial Access Road (SBIAR) shale slope was initially exposed in 2015 as part of road construction works on the south bank. Management and mitigation measures currently include reduction of surface contact water through capture of up-gradient flow and diversion through a pipe to limit flow along the exposed shale slope, and collection of any remaining PAG contact water in ditches at the toe of the east and west slopes. The effectiveness of the mitigation is evaluated through monthly monitoring of water quality stations along the road (Section 3.2.1).

A cover design for long-term mitigation of ARD/ML from the shale slopes has been developed. Construction of the cover is expected to occur in Spring 2026, concurrent with the construction of the permanent site roads.

2.3.4 Left Bank Excavation (LBEX) Slope

The permanent ARD/ML mitigation cover on the LBEX West area was completed in June 2024. The cover design featured a 0.5-meter topsoil layer over 0.1 meters of sand and gravel blended with agricultural lime for short-term pH adjustment. The topsoil was seeded, and the slope cover was reinforced with High-Performance Turf Reinforcement Mats (HPTRM) across 30,000 square meters. The HPTRM was pinned to secure the cover, prevent erosion, and support vegetation growth.

Following implementation, the cover system has demonstrated strong performance, as observed in 2025. The slope is now well-vegetated with native species, and visual inspections confirm no signs of surficial erosion across the treated area. The HPTRM has effectively stabilized the soil, supported vegetation growth, and maintained moisture levels, validating the design's long-term sustainability goals.

A lower portion of the LBEX slope was not covered in 2024 due to project requirements to facilitate the debris haul from the reservoir along the temporary haul road. A cover design for this section has been developed and is expected to be constructed in Summer-Fall 2026.

WM-DWB-LP has advised on water management of water from LBEX since 2024. Water quality monitoring is completed by WM-DWB-LP and reported in Appendix A. Neutral pH values are reported in the water sampling results. Contact water was regularly monitored via in situ testing and lab analysis until September of 2024 when the filling of the reservoir began. Until the filling of the reservoir, water from the LBEX and LBEX Lower Sump was pumped to Garbage Creek when it met BC Water Quality Guidelines (compared to background values). When BC Water Quality Guidelines could not be met and once reservoir levels submerged Garbage Creek, water from LBEX and LBEX Lower Sump was transported to RSEM-R6 pre-treatment ponds to be treated before discharge.

The Lower LBEX Sump sampling location is at the toe of the currently uncovered slope exposure. The LBEX Sump location will continue to be monitored and transported to the RSEM-R6 treatment area to be treated when required.

2.3.5 Area 20/21 Temporary PAG Stockpile

A temporary stockpile was constructed in 2024 in the Area 21 laydown area to hold PAG material prior to ultimate disposal in an approved location. The stockpile was designed by Tetra Tech, with input from the geotechnical, hydrotechnical and QP-ARD teams for stockpile.

The shale material stored in the Area 20/21 Temporary PAG pile is classified as PAG, and rinse pH testing from 2024 indicates that the material is currently acid generating (AG). Rinse pH testing has indicated that isolated areas of the Area 20/21 stockpile have rinse pH values in the range of pH 2 to 4. The BC Hydro stockpile report (July 15, 2025) shows there is a PAG material (shale) volume of 18,200 cubic meters (cu.m.) stored in Area 20/21 Temporary PAG pile. The long-term storage of this shale material is expected to be in the Outlet Portal PAG disposal area.

A water quality sample location was established in January 2024 for the purpose of monitoring run off from the Area 21 Temporary PAG stockpile area. Results are presented in Section 3.2 and detailed in Appendix C.

2.3.6 Left Bank Diversion Tunnel Outlet Area

There was active work in the Left Bank Tunnel Outlet Portal area. There are small shale exposures on the walls of the outlet portal work area. PAG contact water as well as construction concrete contact water from this area is managed in sumps and pumped to the RSEM L6 sediment pond. Due to work in the area, a much larger volume of PAG/AG water was regularly pumped into the L6 Pond beginning in December of 2024. After treatment and regular sampling to confirm the water met EoP parameters, it was ultimately discharged from into the Peace River.

BC Hydro has progressed design plans for permanent PAG storage in the outlet portal area immediately adjacent to the Left Bank Tunnel Outlet portals. Tetra Tech has been engaged as QP(ARD) to review the design. The PAG material to be stored here is from the temporary stockpile in Area 20/21 as well as incidental excavations occurring during the permanent dam site roads work at the Lower River Road shale slope.

2.3.7 R6 Abutment Slope

Geotechnical design work was undertaken on the R6 Abutment shale slope, east of the spillway, which resulted in PAG excavation in 2024. There was foundation preparation to remove weathered shale bedrock from the existing slope such that the Zone 3 material cover could be placed against fresh and geotechnically sound bedrock. The existing slope was benched back, with the temporary excavations progressed in 10m sections of limited height, and with each section backfilled before the next is excavated on the slope. Tetra Tech was engaged by BC Hydro as the ARD(QP) to review and provide recommendations. The PAG shale removed from the slope was transported to the temporary stockpile in Area 20/21.

BC Hydro had initially indicated that a monitoring program to collect water quality samples downstream of the slope to evaluate impacts during and post-construction. Tetra Tech included this consideration in their summary memo as QP(ARD). Due to operational and safety

constraints, a water quality monitoring program at this location was not possible. BC Hydro field staff review the area for visual signs of ARD-ML.

Tetra Tech reviewed this area during June 2025 to evaluate if the removal of a planned water monitoring program was acceptable. No visual signs of ARD/ML were noted. Tetra Tech observed that there is a significant amount of limestone rip-rap placed in all directions from the project area. This includes down-gradient of the slope in the spillway drainage, adjacent to the spillway east (right) wall, and up-gradient of the slope. This all contributes to reducing the potential impacts from ARD-ML from the shale slope. The water quality from this project area is monitored as part of the overall receiving water monitoring program. Based on this review, Tetra Tech considers it acceptable that BC Hydro is not directly sampling at this location.

2.4 Off Dam Site Activities Related to PAG Material Management

No activities were completed offsite related to PAG material management. Refer to previous years annual reports for details on PAG material management associated with the Highway 29 realignment, Portage Mountain Quarry, Transmission Line Right Away and other areas.

3. OVERVIEW OF WATER QUALITY MONITORING PROGRAMS RELATED TO ACID ROCK DRAINAGE AND METAL LEACHING

The CEMP Appendix E identifies responsibilities specific to BC Hydro and the contractor. In 2025, BC Hydro, as owner, and Peace River Hydro Partners, as MCW contractor, engaged QPs in ARD/ML to assist with implementation of the various water quality monitoring programs identified in Table 2. Additional qualified professionals were engaged by contractors as warranted. These roles were filled in accordance with CEMP Appendix E, S.6.1.2.

- DWB Consulting Services Ltd. (West Moberly-DWB Limited Partnership, WM DWB LP), monitors surface water quality within the construction site, operates the mobile water treatment facility and samples sediment from RSEM settling ponds (Appendix A Annual Report)
 - WM-DWB LP was retained by BC Hydro in 2024 to oversee the water treatment portion of the ARD-ML program. The annual summary report provided in Appendix A summarizes the water quality results from between April 15 – December 31 of 2024, and all of 2025.
- ASKI Environmental Reclamation and Trinity Consultants Canada (formerly Ecofish Research Ltd.), BC Hydro's QP, complete Peace River mixing dynamics and water quality monitoring work undertaken in relation to discharge from PAG-contact RSEM sediment ponds. (Appendix B Annual Report)
- Tetra Tech Canada Inc., BC Hydro's QP(ARD) acted in the capacity of auditor of contractor compliance with CEMP Appendix E, while also providing professional advice on the topic of ARD/ML to BC Hydro (Appendix C Annual Report)

The results of the 2025 ARD/ML water quality program are summarized below. The network of monitoring stations for the Site C project has been adapted as site conditions change, with some stations that were established early in the construction phase no longer in use, and other new stations added. Water quality monitoring is conducted at end of pipe and upgradient station

locations. In addition to the surface water quality stations within the construction area, surface water quality samples at established upstream, far-field downstream and IDZ locations in the Peace River are sampled.

Table 2 Water Quality Monitoring Programs related to the ARD/ML Management Plan (CEMP Appendix E)

Program Description		CEMP Appendix E Reference	Frequency	Duration	Geographic Extent	Program Responsibility	Monitoring Program Qualified Professional (QP), 2025
Monitoring associated with PAG-contact RSEM Sediment Ponds	Collected/Contained Water						
	PAG-contact RSEM Sediment Pond Water Quality Water quality sampling, and installation and operation of data loggers for measurement of pH, turbidity and electrical conductivity from PAG containing RSEM sediment ponds.	7.3.2	Hourly (<i>in situ</i> measurements) Daily (water quality sampling)	Ongoing from December 2016	RSEM sediment ponds conveying PAG-contact water	Contractor (Peace River Hydro Partners)	DWB Consulting Services Ltd. (West Moberly-DWB Limited Partnership)
	RSEM Sediment Pond Toxicity Collection of acute toxicity tests (96hr LC50) from water in PAG-contact RSEM sediment ponds	7.2.1, 7.3.1	1) Bi-monthly In event of failure, additional sample 96 hours after first failed sample, additional samples every 96 hours until sample passes. Targeted acute toxicity if pH drops below 6.5 for more than one hour.	Ongoing from November 2016	RSEM sediment ponds conveying PAG-contact water	BC Hydro	ASKI Environmental Reclamation and Trinity Consultants Canada
	Groundwater						
	Groundwater Monitoring <i>Install groundwater monitoring wells upgradient and downgradient of RSEM R5A and R5B, and water quality monitoring of groundwater.</i>	7.2.5, 7.3.3	<i>Quarterly (No longer required as of September 2020 due to river diversion/headpond creation)</i>	<i>September 2016 to July 2020 (wells decommissioned September 2020)</i>	<i>RSEM R5A and RSEM R5B</i>	<i>Contractor (Peace River Hydro Partners)</i>	<i>DWB Consulting Services Ltd. (West Moberly-DWB Limited Partnership)</i>
	Peace River Surface Water						
	Peace River Mixing Dynamics and Water Quality Monitoring Field verification of modelled river mixing dynamics for the RSEM discharge sites, assessment of appropriateness of Initial Dilution Zone (IDZ) sample sites through discharge plume characterization, and collection of surface water quality samples at established upstream, far-field downstream and IDZ locations in the Peace River.	6.1.1, 7.2.3, 7.3.4	Monthly during RSEM discharge events	Ongoing from December 2016	Peace River at locations upstream and downstream of PAG containing RSEM areas	BC Hydro	ASKI Environmental Reclamation and Trinity Consultants Canada
Other Monitoring	Surface Water						
	Dam Site Road Cut Water Quality Monitoring Water quality monitoring at construction-related road cuts into PAG material.	5.2.1.7	Monthly (except while dry/frozen) for first year of observation, then quarterly thereafter unless otherwise directed by the QP(ARD)	Ongoing from fall 2016	Throughout the dam site (left and right Peace River banks)	BC Hydro & Contractor (Peace River Hydro Partners), in their respective work areas	Tetra Tech Canada Inc. (on behalf of BC Hydro) DWB Consulting Services Ltd. (West Moberly-DWB Limited Partnership (on behalf of Peace River Hydro Partners))

3.1 Summary of Implementation Status: Monitoring Programs Associated with PAG-contact RSEM Sediment Ponds

3.1.1 RSEM Sediment Pond Water Management

Water management focuses on segregating possible ARD influenced water (i.e., PAG contact water) from non-PAG contact waters within PAG containing construction areas. Transfers within and between Project area catchments are conducted to improve water management efficiency and to ensure contact waters are routed through an appropriate treatment facility prior to discharge. This is achieved with a network of sumps, ponds, baker tanks, ditches and pipelines, and active water management (i.e., pumps, hoses and water trucks). Water quality monitoring data are used to identify potentially ARD/ML influenced water that requires treatment using the WTP. RSEM sediment control ponds are used to treat suspended sediments (i.e., TSS).

The general water management objectives are to:

- Segregate ARD influenced water that must be treated by the WTP;
- Maximize storage capacity for surges of ARD/ML influenced PAG contact water associated with heavy runoff from rainfall or snowmelt; and,
- Minimize the number of treatment facilities (i.e., sediment control ponds) that require daily management.

The water management system is continuously adapted as earthworks are undertaken, and generally utilizes a series of one or more conveyance and holding structures, including ditches, sumps, and settling ponds. This maintenance of the water management systems in catchments mitigates risk through 2025, as detailed in Appendix A.

As detailed in the WM DWB LP report (Appendix A), WM DWB LP water source characterization is conducted to ensure that water generated across the Site is appropriately classified, managed, and directed to the correct treatment system based on anticipated contaminant exposure. Characterization is based on the expected water quality conditions associated with the source area and the type of contact the water has experienced prior to collection.

Water sources are generally categorized as runoff road water, PAG contact water, or concrete contact water. Runoff road water is typically associated with elevated suspended sediments and potential incidental contact with PAG materials. PAG contact water is characterized by elevated turbidity, elevated dissolved metals, and acidic pH conditions. Concrete contact water is typically associated with elevated turbidity, elevated metals, and alkaline pH. These source characterizations determine whether water is transported to the RSEM R6 treatment system or the RSEM L6 treatment system, depending on treatment objectives, system capacity, and compatibility with existing treatment processes.

In 2025, R6W, R6E, and L6 ponds were the only PAG contact RSEM ponds that were in place, although R6E was no longer in use in 2025. Table 1 provides a summary of PAG contact RSEM pond construction and discharge history; the status of each of these three ponds is further described below.

Water generated across the Site that is anticipated to exceed applicable EoP discharge criteria is directed to the R6 or L6 treatment system prior to release. Treatment routing is determined based on in situ monitoring, analytical results, water quality characteristics, flow volumes, operational limitations, and regulatory compliance considerations. Impacted water is conveyed to either the RSEM R6 Pond System and associated WTF or the RSEM L6 Settling Pond (RSEM-L6-SP or L6-SP) treatment system.

An overview of the main PAG and non-PAG water collection areas and discharges during 2025 is provided in the Appendix A and Appendix B reports.

Left Bank Water Management

The RSEM L6 sediment pond is used to manage PAG-contact water from the RSEM Area L6 catchment. The RSEM L6 pond has also been designated as a hydrovac dump site for AFDE. Additionally, when conditions are not frozen, the pond may receive runoff from the adjacent laydown area and roadway during heavy rain and melting events. The L6 catchment is small; therefore, the RSEM L6 pond generally did not discharge, and was managed to prevent passive discharge. However, as of December 2024, RSEM L6 receives water from the Diversion Tunnel Outlet Area and as a result, frequent discharge to the Peace River began. Furthermore, starting on October 23, 2025, water was also transferred daily from the Left Bank Drainage Approach to the RSEM L6 pond.

WM DWB LP has advised on the management of water from LBEX, LBEX Lower Sump and RSEM-L6 catchment areas on the left bank. Contact water from the LBEX and LBEX Lower Sump was regularly monitored via in situ testing and lab analysis until September of 2024 when the filling of the reservoir began. Until the filling of the reservoir, water from the LBEX and LBEX Lower Sump was pumped to Garbage Creek when it met BC Water Quality Guidelines (compared to background values). When BC Water Quality Guidelines could not be met and once reservoir levels submerged Garbage Creek, water from LBEX and LBEX Lower Sump was transported to RSEM-R6 pre-treatment ponds to be treated before discharge.

Right Bank Water Management

The RSEM R6 pond is divided by a berm, resulting in two ponds: an east pond (RSEM R6E) and a west pond (RSEM R6W). Sampling at the RSEM R6E pond was discontinued in December 2024 as the pond is no longer actively used.

Contact water from the RSEM-R6 area and other catchments above the RSEM area is conveyed to the RSEM R6 Pre-treatment ponds via either pumping or transport by vac truck.

Areas 20 and 21 located south of RSEM-R6 area sees runoff from stockpiled aggregate material as well as contact with nearby concrete waste stockpiles. Runoff from this location is either trucked to the RSEM-R6 pre-treatment ponds or pumped into the nearby South Bank Initial Access Road (SBIAR) Ditch. The SIBAR ditch led to the RSEM-R6-EP pond until September of 2024, at which point the ditch was re-directed into the RSEM-R6 East Pre-Treatment Pond. Since May 9, 2020, RSEM R6W receives treated effluent from the water treatment facility sludge pond.

As of December 2, 2024, BC Hydro began discharging the accumulated powerhouse seepage water directly to the tailrace.

In 2025, the RSEM R6W pond passively discharged water to the Peace River between January and May 2025; the RSEM R6W pond did not discharge between June and December 2025.

Water Treatment

The RSEM R6 Treatment System is designed to manage elevated turbidity, dissolved metals, and variable pH conditions, including PAG contact water and concrete contact water. While the RSEM L6 System is designed mainly to treat suspended sediments and select total metals only.

The RSEM R6 Pond System and WTF provide centralized treatment for the majority of the water sources from across the site. These sources include PAG contact water; road runoff water; and concrete contact water characterized by elevated turbidity, elevated metals, and high pH conditions. The system is designed to achieve metals precipitation, suspended solids removal, and pH adjustment prior to discharge at the RSEM R6 West EOP station.

RSEM R6 Treatment

The treatment process begins with the diversion of water from the SBIAR Ditch to the East Pre-Treatment Pond (EPTP). From the EPTP, water is pumped into West Pre-Treatment Pond (WPTP). These lined pre-treatment ponds provide initial sediment precipitation and allow coarse suspended solids to settle prior to treatment, thereby reducing sediment loading to the downstream ponds. From the western side of the WPTP, water is pumped to the WTF for active chemical treatment. Details of the full RSEM-R6 WTF treatment system is provided in Appendix A

RSEM L6 Treatment

The RSEM-L6-SP pond was initially constructed to manage runoff from the small left bank catchment area. In late November 2024, the pond was repurposed to support treatment of LBDT and Diversion Tunnel Outfall (DT) water during diversion tunnel sealing, decommissioning, and dewatering works. The treatment objective at RSEM-L6-SP is solely the reduction of turbidity/TSS and associated particulate-bound (total) metals from select sources prior to discharge

The initial configuration consisted of two recirculating pumps at the western end of the pond. As part of winter 2025 operational planning, the RSEM-L6-SP treatment system was redesigned. Under the updated configuration, flow from DT and the left bank Drainage Adit (LBDA) were conveyed via pipeline to a dedicated settling tank. Liquid flocculant was dosed at a controlled rate based on measured DT flow volumes. Following flocculant introduction and initial settling within the tank, water was gravity fed into the L6 pond system where turbidity curtains provide additional residence time and settling opportunities

Sediment Pond Discharge from PAG-Containing RSEM Catchments

The active PAG-contact sediment ponds on the dam site are presented below with approximate volumes of water discharged during the year. Details of water discharge by month is provided in Appendix A.

A total volume of 242,550 m³ of water was discharged from the right bank between April 15, 2024 and December 31, 2025. All of this volume was discharged from the RSEM R6 west end of-pipe.

Between April 15, 2024 and December 31, 2025, a total volume of 195,462 m³ of water was discharged from the Left Bank, from the RSEM L6 sediment pond.

3.1.2 RSEM Sediment Pond and Input Sources Water Quality

A brief summary of monitoring undertaken at PAG-contact RSEM sediment ponds is provided below; a detailed description is included in Appendix A West Moberly-DWB Limited Partnership report on water quality.

In general, operational PAG-contact RSEM sediment ponds are subject to the following monitoring regime:

- Continuous monitoring of discharge flow from each RSEM sediment control pond discharge pipe;
- Continuous monitoring (15 minute intervals) of pH, turbidity and electrical conductivity using in situ sonde measurements of PAG-contact RSEM sediment control pond water quality, when discharging;
- Daily field measurements and analytical water quality samples collected end of pipe from each PAG containing RSEM sediment control pond;
- Periodic field measurements and analytical samples collected in-pond from each PAG containing RSEM sediment control pond when not discharging;
- Daily, weekly or periodic field measurements and analytical samples of water quality at upstream sumps and ditches; and
- Quality assurance and quality assurance.

These monitoring measures are undertaken except when the pond is dry or frozen.

Water quality at stations within the construction site upgradient of RSEM sediment ponds are compared to RSEM EOP limits described in the CEMP Appendix E (Table 2) to inform water management. Discharge EOP limits are established for pH, TSS, Cd, Co, Cu and Zn.

Water that accumulates at these stations is not discharged directly to the Peace River. Consequently, water quality at these stations that exceeds RSEM EOP limits does not indicate non-compliance with CEMP requirements. It indicates only that water management may be required.

Overall Summary

The results of surface water quality monitoring have been used to measure the effectiveness of mitigation measures, and to verify compliance with RSEM EoP discharge limits and BC WQG. The surface water quality monitoring program is supported by robust quality assurance

procedures for field sampling and quality control procedures as implemented by ALS laboratories. This applies to the results of monitoring from RSEM Area L6 and R6 sediment ponds and End of Pipe discharge locations.

Discharge monitoring during this reporting period confirmed R6 and L6 EoP discharge limits were not exceeded in 2024 or 2025.

The surface water quality monitoring program has been effective overall. The high frequency of sampling and laboratory analyses have been reliable and effective in identifying water quality trends in the RSEM area sediment ponds, and within upgradient catchment areas. The program allowed contaminants to be identified from catchment areas ahead of time, and the potential effects from ARD/ML contact water on EoP discharge limits to be predicted and addressed through effective treatment of the water prior to discharge.

Right Bank

RSEM Area R6 Sediment Control Ponds

The RSEM R6 sediment control ponds receive water from across the Site. Water is trucked or pumped to the pre-treatment ponds, where it is pumped through the WTF for treatment before flowing through the settling ponds. This allows metals and sediments to settle out and allows sufficient time for turbidity/TSS, and pH to be monitored and adjusted accordingly before discharging to the Peace River (as long as the water quality remains within EoP limits).

Water from the last settling pond was discharged consistently throughout 2024 and during the first half of 2025, however in the latter half of 2025 discharge from last settling pond ceased due to low inflows to the West Pre-Treatment Pond as a result of construction activities winding down in the area.

The discharge points for R6 ponds serve as the compliance points where EoP limits and BC Water Quality Guidelines must be met. RSEM R6 east EOP did not discharge at any point in 2024 and 2025. RSEM R6 west EOP discharged for most of 2024 and the first half of 2025.

Water quality monitoring results for the ponds and EOP stations prior to discharge into the Peace River is provided in Appendix A.

Left Bank

RSEM L6

The L6-SP receives runoff water from RSEM Area L6 as well as construction water pumped from LBDT, LBDA and DT. L6-SP discharges through a culvert onto a rip rap protected outfall, which descends the bank to the Peace River. Water quality is monitored at EoP when discharging, and otherwise at the in-pond station.

The RSEM L6 Sediment Control Pond did not discharge for most of 2024 due to low water levels. In late 2024 new work scopes began in DT, LBDT and LBDA which resulted in construction water being transported to L6-SP. Analytical samples were collected on a twice per week basis between December 2024 and 2025. Due to the volume of water being received

from the new work scopes on left bank to L6-SP, discharge began from L6-EoP in December of 2024.

L6-SP was set up with a flocculant dosing system along with CO₂ dosing equipment to assist in settling suspended solids and total metals from the incoming water along with pH adjustments as needed. Daily in-situ measurements and twice weekly lab samples were taken from L6-EoP to determine if EoP requirements were being met.

3.1.3 RSEM Sediment Pond Toxicity

A summary of toxicity testing undertaken at PAG-contact RSEM sediment ponds in 2025 is provided below; a detailed description is included in Appendix B.

The acute toxicity (Rainbow Trout 96 hour LC₅₀) monitoring program is designed to confirm that water discharged from the PAG contact RSEM ponds is not acutely toxic to aquatic life at the point of discharge into the Peace River. Therefore, prior to discharge into the Peace River, and for the duration of discharge into the Peace River, acute toxicity testing is required for each RSEM pond.

The current toxicity monitoring approach specifies that samples be collected from each PAG contact RSEM sediment pond every two months if there is sufficient water to collect a sample. This will demonstrate regulatory compliance over a range of operating conditions and provide data to confirm or revise the testing program. In the event of an acute toxicity test failure under this monitoring program, an additional sample(s) will be collected to confirm pond water quality returns to non-toxic conditions. An initial sample will be collected 96 hours after the failed sample; if that sample also fails, additional samples will be collected every 96 hours until a test passes. After a test passes, routine acute toxicity testing will resume at a bi-monthly frequency from the sample date of the passed test. Additional targeted acute toxicity testing is also conducted if pond pH drops below 6.5 for more than one hour, which is more conservative than the lower end of pipe (EOP) discharge limit of 6.0 for more than one hour.

A toxicity test “passes” (i.e., the pond water is not acutely toxic) if the result of the test is >50% survival in undiluted pond water. Detailed monthly reports were issued for each month of 2025 which provide results for RSEM pond acute toxicity testing. If a toxicity test fails, results are communicated directly to BC Hydro and WM DWB LP as soon as results are available.

Although it is not a requirement of the CEMP to collect water quality samples from the Peace River in conjunction with acute toxicity sampling, sampling schedules can overlap and, in some cases, acute toxicity sampling is done in conjunction with water quality sampling in the Peace River. If an acute toxicity test failure occurs for a discharging PAG contact RSEM pond, and corresponding water quality samples are collected in the Peace River (upstream of the discharge, at the compliance point 100 m downstream of the discharge and the far-field monitoring sites), data will be reviewed to evaluate any effects of the discharge in the Peace River.

RSEM R6

In 2025, RSEM R6W toxicity samples were collected on a bi-monthly sampling schedule starting in January. Toxicity sampling for the RSEM R6E pond was discontinued in December 2024.

In 2025, all six samples collected from the RSEM R6W pond passed the acute toxicity test.

RSEM L6

In 2025, toxicity sampling of the RSEM L6 pond was done on a monthly basis from January through March to account for the frequent discharge of RSEM L6 as a result of the pond receiving water from the Diversion Tunnel Outlet Area. Due to logistical constraints in the field sampling schedule, the February sampling event was conducted in early March 2025. Sampling followed a bi-monthly schedule from May through November 2025.

In 2025, all seven samples collected from the RSEM L6 pond passed the acute toxicity test.

3.1.4 Peace River Mixing Dynamics and Water Quality Monitoring

A summary of Peace River mixing dynamics (IDZ study) and water quality in 2025 is provided below, as reported by Trinity Consultants and Aski Reclamation LP. A detailed description is included in the Peace River Surface Water Quality and Pond Toxicity 2025 Annual Report (Trinity Consultants, 2026) in Appendix B.

Peace River Mixing Dynamics

Mixing in IDZs has been assessed by Trinity Consultants, on behalf of BC Hydro. Water quality monitoring in the Peace River is also undertaken by Trinity Consultants and reported monthly as well as in the annual report.

Prior to the construction of RSEM sediment ponds and any associated discharges, water quality modelling was undertaken by the project to examine the predicted mixing capacity of the Peace River through a 100 m IDZ. Modelling in previous years has demonstrated that the RSEM discharge plume is generally fully mixed with the Peace River 20 m to 40 m downstream of the pond discharge location, but when present at the 100 m IDZ, is detectable at the proposed 10-15 cm depth 1 m from shore. Mixing within the IDZ for each sediment pond discharge occurs with only a portion of the total flow in the Peace River. Discharge plume characterization was not conducted in 2025.

Monitoring of RSEM pond discharge plumes within the IDZ has been conducted to characterize dilution under a variety of pond discharge and Peace River flows to meet the CEMP requirement to confirm discharge plume dynamics and modeling predictions. IDZ characterization relies on measurements of in situ-specific conductivity, as conductivity in the RSEM ponds is reliably higher than the Peace River. In situ-specific conductivity measurements are recorded in the Peace River at different depths (typically 15 and 30 cm below the surface), distances from shore, and distances upstream and downstream from pond discharge points.

Water Quality Monitoring

Monthly and 5 in 30-day water quality sampling (five evenly spaced sampling events over 30 days performed twice per year, once during the clear flow period and once during the turbid flow period) were conducted when the RSEM ponds were discharging in 2025 (Appendix B).

Sampling consisted of collecting measurements in the field, and collection of water quality samples for laboratory analysis.

The full suite of laboratory parameters as specified in Section 7.3.2 of the ARD/ML Management Plan (CEMP, Appendix E) (physical, anions and nutrients, total metals, and dissolved metals) were sampled monthly when the RSEM ponds were discharging. The same parameters were also sampled for the 5 in 30-day sampling. Monthly sampling was used to also fulfil one or more of the 5 in 30-day sampling requirements. These parameters are consistent with those being measured by WM DWB LP in the RSEM ponds.

The following monthly and 5 in 30-day site locations were sampled in the Peace River to monitor discharge from the RSEM R6W pond (between January and May 2025) and the RSEM L6 pond (sampled monthly in 2025): a control site upstream of the Site C dam, which is located within the lower Site C reservoir since reservoir filling in August 2024, and two far-field locations downstream of the Project on the right bank and left bank of the Peace River. In addition, for each discharging PAG-contact RSEM sediment pond, an upstream site located at least 5 m upstream of the discharge point, and an IDZ monitoring site located at the edge of the IDZ (100 m downstream of the discharge point) is sampled. See Appendix B for details of the sample locations.

Monthly sampling was conducted during months where discharge occurred from each pond. In 2025, monthly sampling during discharge to the Peace River was completed for RSEM R6W between January and May and for RSEM L6 between January and December. The 5 in 30-day sampling for RSEM R6W was conducted during the turbid flow period from May 8, 2025 to May 29, 2025; however, only four sampling events were completed because RSEM R6W ceased discharging on May 30, 2025. The 5 in 30-day sampling for RSEM L6 was completed during the turbid flow period from May 8, 2025 to June 2, 2025, and during the clear flow period from October 8, 2025 to November 3, 2025. It should be noted that all flows measured at the Peace Upstream and the RSEM pond upstream sites during 2025 were clear ($TSS \leq 25$ mg/L).

For the monitoring conducted in 2025, there were no observations of exceedances in the Peace River of the BC WQG (short-term or long-term) for the protection of aquatic life that were attributed to discharge of water from the RSEM ponds. A single exceedance of the short-term (maximum) BC WQG for the protection of aquatic life for total iron was observed at the RSEM L6 IDZ site in September 2025. This exceedance coincided with the highest TSS concentration measured during the 2025 monitoring period (51.7 mg/L) and occurred during in-channel dredging activities upstream, suggesting the exceedance was likely associated with localized sediment disturbance rather than RSEM pond discharge.

In 2025, no exceedances in the Peace River were observed during the peak freshet months. This contrasts with annual monitoring conducted between 2017 and 2024, and baseline

monitoring, where exceedances were primarily associated with elevated concentrations of suspended solids in the Peace River during the freshet period.

Peace River TSS

The RSEM ponds have EOP limits for total suspended solids (TSS). Continuous turbidity gauges installed on the left and right bank of the Peace River upstream of the confluence with the Moberly River were used from January to August 2024 to inform the project's Main Civil Works contractor, PRHP until April 21, 2024 and WM DWB LP as of April 22, 2024, of the Peace River background TSS. These stations were decommissioned in August 2024 prior to reservoir filling and were replaced with two stations located ~1 km below the Site C dam.

To estimate the background Peace River TSS, Trinity Consultants has developed TSS:turbidity relationships over the course of monitoring which are used to estimate TSS concentrations from the turbidity data logged by the monitoring stations. This relationship between TSS and turbidity is dynamic and depends upon a variety of factors, including snowmelt and precipitation driven changes in the relative contributions of various sediment sources (BC ENV 2024), as well as hydrology related changes in the sediment carrying capacity of the Peace River. As such, a site-specific TSS:turbidity relationship has been developed for the Peace River over a range of flow and turbidity conditions and this relationship is updated regularly with turbidity data recorded by the gauges paired with additional data from laboratory analyzed TSS samples to ensure the relationship reflects current conditions. In 2024, TSS sampling was completed on 12 sampling dates.

Background TSS data are reported by WM DWB LP. As reported in Appendix B, The TSS:turbidity relationship applied to calculate TSS from turbidity data in 2025 was 0.71:1. A total of 372 samples collected over 90 sampling dates between December 15, 2017 to October 12, 2025 were used to develop the updated TSS:turbidity relationship. These data encompassed a wide range of turbidity (1.7 NTU to 2,618 NTU) and TSS (1.2 mg/L to 1,710 mg/L) observations.

3.1.5 Groundwater Monitoring

The groundwater monitoring program at RSEM R5A and R5B was initiated in 2016 and completed in 2020 (Lorax, 2020) to fulfill the requirements of CEMP Appendix E, S.7.25 and S.7.3.3. Details of the groundwater monitoring are provided in previous years annual reports.

Separate from the above-mentioned program, groundwater seepage water quality and water management are dealt with in various areas of the site, which is detailed by DWB Consulting Services Ltd. (West Moberly-DWB Limited Partnership) in Appendix A.

3.2 Summary of Implementation Status: Other Monitoring Programs

3.2.1 Dam Site Road Cut and Other PAG Shale Exposures Water Quality Monitoring

A summary of the 2025 monitoring results for the water quality program for dam site road cut and associated PAG occurrences is included below, as reported by Tetra Tech. Details of the sampling programs and results are provided in the Tetra Tech annual report in Appendix C.

River Road

Flows within the River Road ditch are ephemeral. Water quality laboratory data was collected from five locations within the River Road ditch during 2025. Four of the five stations were only sampled during one sampling event, in February 2025. Dry or frozen conditions prevented sampling at these four stations outside of that one event. A total eight (8) samples were collected from River Road during 2025 for laboratory analytical testing.

BCAWQG-FST exceedances were measured for chloride, total cobalt, total iron, total manganese, total silver, dissolved cadmium, dissolved nickel, and dissolved zinc in select sample events. These results are consistent with results in previous sampling years. Neutral to alkaline lab pH values ranged from pH 7.69 to 8.27 throughout the year.

In the River Road catchment, the source of TSS is primarily attributed to River Road run-off, scouring sediment deposited within the River Road ditch and washing from the cut-slopes. During the February 2025 sampling event, turbid high flows were observed associated with water management issues from ongoing Blind Corner works and PAG mitigation cover at the Upper Chimney drainage. further up the drainage where upstream water was then diverted to the Howe Pit pond and flows drastically reduced at the Lower Chimney drainage following sampling. In April 2025, the ditch was cleaned out around Blind Corner and straw wattle materials placed in front of the culvert of the downstream station in the sediment control ditch and downstream of the L3 creek diversion pipe.

As per CEMP Appendix E Section 5.2.1.7, it is recommended that water quality monitoring is continued on a monthly basis within the River Road catchment at the downstream stations until the final ARD/ML mitigation covers are in place. The sampling locations and frequency of monitoring will be reviewed with BC Hydro pending completion of the long-term covers.

South Bank Initial Access Road

Water quality data was collected from three established sampling locations in 2024 that measure water directly from within the SBIAR ditch locations. The ditch samples provide long-term characterization of SBIAR water management and water quality originating from the SBIAR PAG slopes at the upstream and downstream location in the east and west ditches.

At SBIAR, sufficient flowing water permitted twenty-two (22) lab samples to be collected during 2025. In situ measurements were collected in the same months when sampling was possible.

Evidence of active ARD-ML processes are observed on the shale slopes in SBIAR through observation of secondary iron hydroxide mineral formation. During 2025, the pH values remain neutral to alkaline in three SBIAR ditches and vary from acidic to alkaline in the one downstream west ditch. In the downstream west ditch, orange-tinged staining in water was noted in the March and June sampling events; and pH varied from a low pH of 4.76 and 5.26 in June and March, to a pH between 7.59 to 8.78 in the remaining eight months of sampling at in 2025. It is noted that similar low pH values were noted in March and June 2024, with alkaline pH values through the remainder of the year. In 2024 it was partially attributed to construction ditch

cleaning that exposed new shale in March 2024. In both years, the field samplers note orange-stained water, with some fresh exposures of shale possibly resulting from freshet flows

Precipitate formation in the ditches, occurring predominantly as rust-coloured staining in the ditch line, is indicative of the change in pH from the acidic condition on the slope to alkaline pH in the ditch and the associated precipitation of metals out of solution.

BCAWQG-FST exceedances were measured for pH<6.5, chloride, total iron, total cobalt, total manganese, dissolved cadmium, dissolved copper, dissolved iron, dissolved nickel, and dissolved zinc in select sample events. These results are consistent with results in previous sampling years.

The collection of up-gradient and down-gradient water samples from both the western and eastern SBIAR ditch is suggested to continue through 2026 for comparative purposes prior to and during the construction of the long-term cover solution. Once the cover solution is in place the need for long-term monitoring is not considered necessary but may support characterization of the effectiveness of the cover. The need for monitoring will depend on the water management after construction. Downstream water is currently collected within the RSEM R6 pond for management including testing, and treatment as needed, prior to discharge into the Peace River.

Right Bank Drainage Tunnel

The Right Bank Powerhouse Drainage Tunnel is excavated below the spillway and Powerhouse and ends under the dam core buttress at the center of the dam structure. The RBDT has 300+ drains installed along the tunnel in pullouts and water is collected in sumps which is then collected and pumped out for treatment. Significant seepage occurred below the powerhouse in 2024 and portions of the tunnel were lined with shotcrete, steel and a foaming expanding synthetic grout to control the seepage. In 2025, water quality analysis of samples collected from RBDT-sump at the tunnel portal outlet was conducted.

The RBDT-Sump location was sampled eleven (11) times from February to December 2025. The water collected at RBDT-Sump is characterized by alkaline pH values, elevated ammonia, and aluminum. Water is pumped to treatment, as needed based on results of testing.

Area 20/21 Temporary PAG Stockpile Sump

The Area 21-Sump sample location was established in January 2024 and receives run-off from the Area 21 Temporary PAG stockpile area, as well as groundwater recharge. The accumulated water in the sump was pumped to the SBIAR Ditch when required, where it is managed through the RSEM R6 ponds, and water treatment as needed, prior to ultimate discharge.

In 2025, nine (9) water samples and nine (9) coincident in situ measurements and field observation notes were taken from the Area 21-Sump to characterize lab water quality from February to October. No samples and frozen conditions were observed in other months in 2025.

The nine sample events in 2025 at the Area 21-Sump location measured no BCAWQG-FST (freshwater short-term) guideline exceedances.

At Area 21-Sump, the pH measures consistently neutral to alkaline with a range of pH 7.6 to 8.0, and average pH 7.8.

3.2.2 Off Dam Site Water Quality Monitoring

Water quality monitoring at off-dam site exposures is completed in accordance with the CEMP, Appendix E S.5.2.2. No off-site water quality monitoring was required during 2025.

4. SITE AUDITS

BC Hydro has engaged Tetra Tech as QP (ARD), in accordance with the CEMP Appendix E S. 6.1.2, to inspect and monitor various construction areas with potential for ARD/ML since June 2016. The site audit includes observations of ARD-ML materials management at various construction areas, Relocated Surplus Excavation material (RSEM) facilities and designated water discharge points.

The site audit locations focused on areas of stored or exposed shale rock, condition and functioning of implemented mitigation and management including limestone riprap and water management structures, and the surface water receptors potentially influenced by PAG materials. While visiting these locations, observations were made based on visual inspection and detailed investigations were not conducted, however, some in-situ measurements or confirmatory rock samples were collected during some audits.

A summary of the site audit was reported to BC Hydro during the year. One site audit was conducted on June 25-26, 2025 by Scott Kingston, P.Geo. from Tetra Tech. The site audit locations focused on areas of stored or exposed shale rock (PAG), condition and functioning of implemented mitigation and management, including limestone riprap and water management structures, and the surface water receptors potentially influenced by PAG materials. The site audit at the Main Civil Works areas, included observations at River Road Blind Corner, North Bank Road, RSEM L6 and Sediment Pond, Left bank Diversion Tunnel Portal, Lock Block Wall, SBIAR, Area 20/21 Temporary PAG stockpile, Area A, R6 Abutment with Powerhouse, and the Right Bank Drainage Tunnel.

Appendix A

Appendix B

Appendix C
