From:	Lis Stannus
To:	Kitimat Clean Refinery / Raffinerie de Kitimat Clean (CEAA/ACEE)
Subject:	Kitimat Clean Environmental Impact Statement Comments
Date:	August 11, 2016 8:55:54 PM
Attachments:	Kitimat Clean Project EIS August 11 2016.docx

Please find attached my comments on the Kitimat Clean Refinery Environmental Impact Assessment Draft.

Sincerely,
Elisabeth Stannus
Kitimat, B.C.

Kitimat Clean Project Environmental Impact Statement Comments
August 11, 2016

Dear Canadian Environmental Assessment Agency,

I have lived in Kitimat for seventeen years and am concerned with the impact of air pollution with a new refinery. There is no air shed plan in place for the Kitimat Valley to look at the big picture of air quality in this region. Presently we have increased sulphur dioxide from Rio Tinto and PM2.5 is also problematic at times due to industry burnings/clearings in anticipation of new industry. Wildfires contribute to issues of pollution in this area being the town site is surrounded by forest. Since pollution outflow is theoretically supposed to travel through the Kitimat Valley towards Terrace I am also concerned about the effects of PM2.5 on Terrace residents. I will now though provide specific comments regarding the Environmental Impact Statement as follows:

Section 6.1.1 Atmospheric Environment

There is no mention of ground level ozone specified in the list of contaminants and currently air quality monitors in Kitimat do not measure ground level ozone. During the summer months when temperatures are warm with less air flow, pollution from industry is visible hovering over the Rio Tinto smelter site and sits in the Kitimat Valley over the location of the proposed refinery. Kitimatians often participate in outdoor recreation (ATVing, hiking, fishing) in the vicinity of the proposed refinery and will have exposure to ground level ozone. Ground level ozone is a harmful pollutant effecting people and environment. (https://www.ec.gc.ca/air/default.asp?lang=En&n=590611CA) Ground level ozone should also be one of the contaminants studied when assessing the refinery.

Section 6.1.12 Human Environment

There is no detailed information provided on how human health will be assessed for the general population. Currently there is no baseline of the health of Kitimat residents to determine the current health status of persons living in this area specifically. How will health be assessed and vulnerabilities identified in the Kitimat Valley? (The proposed refinery location is close to a rural subdivision (2 to 3 kilometres approximately) and located 13 kilometres north of Kitimat.)

Section 6.6.3 Cumulative Effects Assessment

Greenhouse gas emissions are specified but the cumulative effects of pollutants interacting with each other i.e. sulphur dioxide and nitrogen oxide, sulphur dioxide and particulate matter, nitrogen oxide and volatile organic compounds need further study than each pollutant looked at in isolation. Since various source points emit different emissions the combined effect of different emissions on health and environment need further study. How are cumulative effects taken in to account by the Environmental Assessment?

Thank you for receiving my comments.

Elisabeth Stannus

[redacted]

Kitimat [redacted]