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Cc: [Cooper,Garett \[CEAA\]](#); [Kaminski, Gregory: HC](#); [Hess, Katherine: HC](#); [Antill, Herbert: HC](#); [Lucille Lukey](#)
Subject: Kitimat Clean Refinery Project - Health Canada (HC) comments on EIS Guidelines
Date: August 11, 2016 6:16:18 PM
Attachments: [Kitimat Clean draft EIS guidelines_HC comments.pdf](#)

Hi Quincy,

As per your request, HC has reviewed the draft EIS Guidelines for the proposed Kitimat Clean Refinery Project, and has the following comments for your consideration. Attached also are our comments within a .PDF comment. Please select View - Comment - Review to see a list of all comments as referred to in this email associated within the text of the .PDF on the right hand side bar.

(See attached file: Kitimat Clean draft EIS guidelines_HC comments.pdf)

1.) **3.2.1 Changes to the Environment (pg. 6)**

- HC suggests including changes in noise levels-and revising the paragraph to: "any potential changes in the physical environment such as changes to air quality, water quality and quantity, **noise levels** and physical disturbance of land"

2.) **4.3 Study strategy and methodology (pg. 10)**

- HC suggests revising the bullet point to include the following: "predicting and evaluating the likely effects on identified VCs, **and comparing these to applicable benchmarks, guidelines, standards or objectives**"

3.) **Part 2 - 1.3 Project Location (pg. 14)**

- HC suggests revising description of local communities to include population and distance(s) of communities to the proposed project area. Indigenous communities should be identified. Also to note, the typo on "Traditional territories".
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4.) **Part 2 - 6.1.1 Atmospheric Environment (pg. 22)**

- HC suggests adding the following to the paragraph on "ambient air quality in the project areas": **Consideration should also be given to other potential air quality contaminants (E.g. NH₃, ground level ozone precursors and project's contribution to the regional ground level ozone levels, diesel PM, air pollutants on List of Toxic Substances in Schedule 1 of CEPA 1999) that may result from proposed Project activities. A characterization of baseline levels of any potential contaminants and emissions undergoing further assessment, along with a rationale for screening out any potential project-related emissions from the assessment should be included.**
- HC suggests changing the following paragraph to better clarify noise impacts.

-Current ambient noise levels at key receptor points (e.g., Indigenous communities), including the results of a baseline ambient noise survey. Information on typical sound sources, geographic extent **including proximity to residential communities** and temporal variations **(E.g. variability in**

predicted noise levels at different times of the day including night-time noise) will be included;

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5.) **Part 2 - 6.1.5 Groundwater & Surface Water (pg. 24-25)**

- HC suggests revising the following lines (bolded for changes): local and regional potable groundwater supplies **within the project's area of influence**, including their current use and potential for future use **as drinking-water sources**
- HC suggests revising the following lines (bolded for changes): any local and regional potable surface water resources **within the project's area of influence, including their current use and potential for future use for drinking, recreational (e.g.wading, swimming, boating, fishing) and cultural/traditional uses;**

6.) **Part 2 - 6.1.7 Fish & fish habitat (pg. 25-26)**

- HC suggests the identification of the specific species of fish which may be consumed by the local community that could be impacted by project activities, as they are particularly important linkages to human health assessment
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7.) **Part 2 - 6.1.10 Indigenous peoples (pg. 27-28)**

- Under "location of reserves and communities", HC recommends adding information relating to community populations and distance to project area
- Under "recreational uses", HC recommends providing examples related to land, water and cultural values/traditional practices for improved clarity
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8.) **Part 2 - 6.6.1 Effects of potential accidents or malfunctions (pg. 36-37) - *Accidents or Malfunctions Related to Marine and Rail Transportation***

- HC suggests adding "clean up" to the line "...including exercise, training plans, spill emergency response **and clean up**"
- HC suggests considering the inclusion of a list of COPCs of greatest concern to be aware of along with potential mitigation measures in case of spills or accidents

Thank you for the opportunity to comment.

Sincerely,

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