

From: Kenneth Law
To: Maracle,Brett [CEAA]; Hajdu,Rob [CEAA]
Cc: Kaminski, Gregory: HC; Hess, Katherine: HC; Lucille Lukey; paula.smith2@canada.ca
Subject: Pacific Future Energy Refinery - Health Canada"s (HC) comments on EIS Guidelines
Date: November 7, 2016 1:30:04 PM
Attachments: [07_10_2016_draft EIS guidelines_Pacific Future Energy Refinery HC Comments.pdf](#)

Dear Brett & Rob:

As per your request, HC has reviewed the draft EIS Guidelines for the proposed Pacific Future Energy 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: 07_10_2016_draft EIS guidelines_Pacific Future Energy Refinery HC Comments.pdf)

1.) **3.2.1 Changes to the Environment (pg. 5)**

- 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, **background noise** and physical disturbance of land"

2.) **4.3 Study strategy and methodology (pg. 9)**

- 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. 13)**

- HC suggests revising description of local communities to include population(s) and distance(s) of communities to the proposed project area.

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": by identifying and quantifying emission sources and, in particular, the following contaminants: total suspended particulates, fine particulates smaller than 2.5 microns (PM2.5), particulates less than 10 microns (PM10), carbon monoxide (CO), sulphur oxides (SOx), volatile organic compounds (VOCs) and nitrogen oxides (NOx), hydrogen sulfide (H2S), **NH3, ground level ozone precursors and project's contribution to the regional ground level ozone levels, diesel PM (DPM)**, and all other toxic air pollutants (mobile and stationary sources) **including those on the List of Toxic Substances in Schedule 1 of CEPA 1999**

- 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";

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

- HC suggests revising the following line (bolded for additions): 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 line (bolded for additions): 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)**

- HC suggests the identification of species of fish consumed by the local community that could be impacted by project activities

7.) **Part 2 - 6.1.10 Indigenous peoples (pg. 27)**

- Under "location of reserves and communities", HC recommends adding information relating to community populations and distances to project area
- Under "recreational uses", HC recommends providing examples related to land, water and cultural values/traditional practices
- HC suggests the addition of a bullet point for current background noise levels on the site

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 and training plans for spill emergency response **and clean-up**"
- HC suggests considering the inclusion of a list of COPCs of greatest concern to human health to be aware of along with potential mitigation measures in case of spills or accidents

Thank you for the opportunity to comment.

Sincerely,

Kenneth Law, MPlan

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