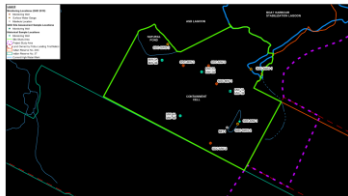


Comment Number	Reference to EIS	Context and Rationale	Comment Number
1.	Summary of Environmental Impact Statement (SEIS) Page 1	The closure of the BHETF operations and remediation of BHETF will result in a significant <u>reduction</u> in emissions, discharges, and wastes.	Can you please clarify what emissions, discharges and wastes will continue into the BHETF?
2.	SEIS Page 5	Prior to modifications of the existing containment cell, the current waste in the containment cell would be temporarily relocated either by pumping or hauling to existing Site infrastructure (i.e., settling basins, ASB) or constructed staging areas.	Where are these staging areas? Not shown on any plans nor discussed. Seems like there are options but ASB is the focus.
3.	SEIS Page 6	Leachate Management Dewatering effluent from Geotubes® or equivalent technology would be collected and conveyed to Boat Harbour, where it would undergo natural attenuation processes before being discharged to the estuary. The effluent discharge criteria are currently being developed using a risk based approach. Final discharge criteria would be adopted through the Provincial IA process required for the remediation. Dewatering Effluent = Leachate	What is the natural attenuation process planned? Is this going through an engineered wetland and/or settling ponds? What if it fails and/or has constituents that cannot naturally attenuate quickly? Off site collection and disposal is proposed for long term leachate issues, why not here? Also flagged as an issue by the Provincial reviewers.
4.	SEIS Page 8	During dredging, the active area or downstream areas of BHSL would receive the pre-treated dewatering effluent from the containment cell. Once returned to BHSL, the effluent would undergo additional treatment through natural attenuation processes. The water level control structure at the causeway will provide the ability to hold water in BHSL should the water quality exceed discharge criteria.	This additional treatment via natural attenuation. What will this involve? Little detail provided on this plan. Also pertaining to this section of the summary how will the impacted sediments in the containment cell be moved to the ASB or Setting Ponds or Lay Down Area?
5.	SEIS Page 8	QA/QC Program for Dredging	Contractor will be responsible for QC. Who will be responsible for QA?

Comment Number	Reference to EIS	Context and Rationale	Comment Number
6.	SEIS Page 19	<p>Dam</p> <p>There was a comment during the QA session regarding deepening of the BHSL outflow. This section confirms that there will be some dredging undertaken in this area to deepen the channel.</p>	<p>What is the extent of the dredging at the mouth of the harbour? How Deep? This is of interest to PLFN.</p>
7.	SEIS Page 17	<p>Treatment Buildings</p> <p>Footing and foundations would be cut and buried. Only above-grade structures would be removed. There may be an opportunity to re-purpose buildings where it may be beneficial to PLFN, which would require some modified approach to the decommissioning process. PLFN's potential use of buildings will be confirmed through further consultation with them.</p>	<p>Has this been discussed with PLFN during the consultation?</p> <p>Do not think that leaving below grade infrastructure in place would be in line with the objective of this assignment.</p>
8.	SEIS Page 21	<p>Water Supply</p> <p>"Temporary water supply service would be required during causeway removal and bridge construction activities. Upon completion of bridge construction, permanent water supply services would be reinstated."</p>	<p>What will this temporary service look like?</p> <p>What are the expected impacts to the community during connection?</p> <p>Is there a predicted season in the schedule for the bridge work?</p>
9.	SEIS Page 25	<p>3.2.1 Waste Management</p> <p>It is noted that under each approach, the existing containment cell would be left in place. The four approaches reviewed are as follows:</p> <ol style="list-style-type: none"> 1. Existing Cell 2. New Cell 3. Existing and New Cell 4. Off Site Disposal to existing facility. 	<p>Why would the containment cell be left in place? The communities main concern pertaining to this project has been the containment cell remaining on-site.</p>
10.	SEIS Page 30	<p>Containment Cell:</p> <p>"In response to the public and PLFN concerns relating to the containment cell, including the effectiveness and the longevity of the</p>	<p>From what EXP has heard at the consultation meetings, the community concern is relating to the</p>

Comment Number	Reference to EIS	Context and Rationale	Comment Number
		<p>containment cell to contain the waste placed in it as the Project progresses, NSLI committed to continue to engage with stakeholders on the topic of the containment cell. At this stage, to address concerns raised about the longevity and effectiveness of the containment cell, NSLI has designed an improved base liner system that will reduce the potential for leachate to migrate through the liner to the groundwater and has modelled the effectiveness of the liner.”</p>	<p>fact that the toxic waste landfill is remaining at all and not so much its longevity. GHD and NS Lands should accurately reflect the concerns in the EIS report.</p> <p>This section has been left fairly ambiguous on the path forward and there is data missing.</p>
<p>11.</p>	<p>Section 2.2 Alternative Means 2.2.1.2.1 Waste Management</p>	<p>Incineration was ruled out early for many reasons but mainly due to typical opposition to this technology observed throughout NS.</p> <ol style="list-style-type: none"> 1. Existing Cell 2. New Cell 3. Existing and New Cell 4. Off Site Disposal to existing facility. <p>New Cell: looked at the development of the new cell on-site in the existing settling basins. Use Existing and New Cell: this option looked again at a new cell on-site.</p> <p>It does not appear as though a new cell was looked at off site. Option 2 and 3 were ruled out because it was perceived there would be public push back, the cell location was in the middle of the site and the cell height would exceed natural surroundings. Maybe not in this section but no discussion on how option 4 was ruled out. Noted that there were 4 consultations had where they went over the details on containment cells.</p>	<p>The PLFN community has been very vocal about their displeasure with the containment cell remaining on site. The EIS should show greater rationale for option 4 being eliminated from contention.</p> <p>Further a new cell, off site, away from the harbour would be more agreeable to the community but this has not been looked at in sufficient detail by NS Lands. The current plan already includes double handling of the existing waste in the cell. Perhaps a new cell would reduce some if the risk associated with moving the waste twice.</p>
<p>12.</p>	<p>Volume II of V Page 2-33</p>	<p>“The findings indicate that portions of the wetlands and the estuary are impacted above the risk-based criteria established in the HHERA, and therefore will need to undergo ex-situ remediation discussed under Alternative Mean 2. Areas where the concentrations are below the risk-based criteria will be managed through natural attenuation, as the Preferred Alternative Mean.</p>	<p>Has this sampling been completed?</p> <p>Is there a know volume of wetland to be excavated yet?</p>

Comment Number	Reference to EIS	Context and Rationale	Comment Number
		<p>Additional sampling will be completed in 2020 to further characterize the wetlands and refine the areas that require remediation.”</p> <p>The overall ranking in the Table shows Natural Attenuation as the preferred method but this is not actually declared or discussed.</p>	<p>If the HHERA has to be re-evaluated to potable standards, what would the estimated volume of wetlands that would be impacted above the HHERA criteria?</p>
<p>13.</p>	<p>Page 89 of 808 IV of V – Table 7.1-17</p>	<p>This section discusses the groundwater interaction around the containment cell. It notes that the vertical groundwater flow path is downward from the overburden into the bedrock. Bedrock in the area is sandstone which is typically fairly fractured at surface and commonly referred to the quick release pathway.</p> <p>Figure 7.1-5 shows a cross section going through the containment cell. The overburden in this area is only 5 metres thick. With the water level between 2 and 4 metres below ground surface. All numbers in report are given in relation to sea level.</p> <p>Figure 7.1-12 is provided to show the monitoring well network around the containment cell. For some reason the base map is black. It would be best to have an aerial or topo map, to show the actual containment cell. Had to search through original Phase II ESA reports to get proper mapping.</p> 	<p>Please provide updated mapping. Likely just a PDF issue.</p> <p>Has any work been done to assess whether the existing containment cell has waste in contact with groundwater?</p> <p>One of the reference documents discussed some test pits completed in the waste cell but the information was hard to find. More details should be in the main part of the EIS.</p>

Comment Number	Reference to EIS	Context and Rationale	Comment Number
		Figure 7.3-7 - the inferred horizontal groundwater flow direction is from the Containment Cell toward Boat Harbour and towards the well fields.	
14.	Page 7-91 #7 Containment Cell and Surrounding Wetland	Fall sampling event for the wetland directly adjacent to the containment cell had metals and PHC exceedances. Previous reporting on the wetlands noted that there were no PHCs above guideline.	Will these PHC and metal exceedances be cleaned up as part of the remediation? Comment seen that they are within the SSSL's developed within the HHERA.
15.	7.3.7.4.1 Waste Management – Project Activities and Surface Water Interactions and Effects and Mitigation Measures	“The temporary relocation of existing waste from the containment cell to one of the settling basins and/or the ASB could result in potential impacts to surface water quality through depositing harmful substances in waters. However, as the waters within the settling basins and ASB are already heavily contaminated as a result of BHETF, the addition of harmful substances in the water is anticipated to have limited effects. In addition, any effect would be short-term in nature as both the settling basins and ASB will be dredged and all contaminated substances will be removed. Waters within active dredging areas will be disturbed and have water quality changes but will not discharge to the natural environment without going through water treatment and meeting specific discharge criteria. The dam forms a barrier to release during the dredging and construction work with discharge going to the marine environment only after water treatment. During active remediation of the BHETF, water will be discharged to the estuary leading to the Northumberland Strait via the existing BHSL outlet structure (i.e., existing dam). Using the approach of managing the water within the BHSL and controlling the release of water (by pumping and/or treatment), temporary water treatment systems will likely be configured adjacent to the box culverts/dam that currently facilitate the discharge of water from the BHSL. Based on previous input from Nova Scotia Environment (NSE), a mixing zone based approach is not permissible; thus, the proposed	Plan on moving existing waste to ASB and/or the settling basin? Which one will it be? What measures to protect the environment while being placed and stored in there? How will it get moved? Going into Geotubes? Moved from dry to wet, will now be wet and require placement in Geotubes? Has the waste been characterized? What is in the containment cell? Only wastes since 1996. Volume: NSLI notes that should more capacity be needed the side slopes will be increased and the cell expanded vertically. This is concerning in that we have seen slope failures on other waste cells when their slopes become too sheer.

Comment Number	Reference to EIS	Context and Rationale	Comment Number
		<p>water discharge compliance criteria will apply at end of pipe (EOP) at the discharge of the temporary water treatment and/or pumping systems utilized to control the water level in BHSL. Discharge criteria were developed using regulatory (provincial and federal), background and risk assessment considerations and are fully outlined in the HHRA included as Appendix A to this EIS (specifically Appendix G – Establishment of Water Treatment Compliance Criteria, Boat Harbour Remediation Planning and Design). Further analysis of potential impacts for this aspect of the Project is therefore not required as the pathway for release to the natural environment is not present and all water discharged from BHSL will meet the proposed water discharge criteria, which are predicted to be equal or higher quality than the historical precedent.</p>	
16.	Table 8.1-2 Page 8-10	<p>Air Quality VEC. This section is discussing long term effects from the project as they pertain to air quality.</p> <p>There is no discussion pertaining to long term affects from the passive vents installed in the containment cell as they pertain to air quality. Specifically odours.</p> <p>Note: these AQ emissions are only covered under green house gases.</p>	Will there be any long term effects from the passive vents installed in the containment cell?
17.	Page 8-20	<p>Terrestrial Habitat and Vegetation. This section is all pertaining to the temporary impacts due to construction and remediation.</p> <p>The containment cell is long term and permanent feature that will include not only the cell but the leachate tanks, access roads, security fencing.</p> <p>There is note that there will be a temporary loss of wetland but it is possible there will be permanent wetland loss due to augmentation of the containment cell.</p>	Should the long term impacts of the containment cell be discussed?

Comment Number	Reference to EIS	Context and Rationale	Comment Number
18.	Table 8.1-2 Page 8-36	<p>A potential effect of waste management (the containment cell in this case): “Perceived limitation in restoration of traditional land and resource use”</p> <p>Job Creation</p>	<p>The containment cell is not a perceived limitation in land use. It is actual and it is forever.</p> <p>Job Creation – Job creation is mentioned in other locations as a positive on the project. With long term jobs associated with the long term monitoring and the containment cell management. The management is a legitimate job for one person to empty the waste from the leachate tank but this is normally conducted by the waste management facility collecting the liquid. Secondly the monitoring will likely be a quarterly event sampling program that last about 2 days in the field. The majority of the cost of a monitoring program goes to the laboratory that take approximately 70% of the costs.</p>
19.	General	Full design of containment cell is not complete. The video shared at the last consultation meeting is a concept but not necessarily what will be built in the field.	<p>What guarantee does PLFN get, should the containment cell proceed, that it will be the most robust design possible? Will it be as per the video with the 6+ foot thick liner? The video design showed multiple layers of expensive fabrics and materials.</p>
20.	Page 8-37	“Minimize the size/extent of open faces of the containment cell that have potential to emit odours or other contaminants”	Why will these not be sealed off completely?

Comment Number	Reference to EIS	Context and Rationale	Comment Number
			Is this referring to temporary or during construction or dewatering phases? What about the long term cover.
21.	Page 8-39	This Section reviews the Human Health impacts associated with Waste Management; Dredging; Wetland Management; Bridge at HWY 348 and the Pipeline Decommissioning	No reference to the containment cell except for a brief mention with regard to long term monitoring. Will long term monitoring of the containment cell include the following: <ul style="list-style-type: none"> • Pore water monitoring • Slope stability • Overall site condition Will air monitoring be completed on the methane stacks. Stack heights be suitable to prevent vandalism?
22.	Page 8-49	Mi'Kmaq of NS "Perceived limitation in restoration of traditional land and resource use...Negligible to minor disturbance to local residents"	The permanent toxic waste landfill directly adjacent to boat harbour is not considered perceived. It is actual and forever. All consultations have identified its mere presence as significant, therefore this would not be considered negligible or minor disturbance.

Comment Number	Reference to EIS	Context and Rationale	Comment Number
23.	Page 9-5 Table 9.1-1	Atmospheric Environment	Will there be a period of atmospheric monitoring following remediation? What about the Containment Cell Methane vents?
24.	Page 9-5 Table 9.1-1	Containment Cell Monitoring There is mention of 6 to 25+ years for post closure monitoring.	What happens after 25 years? , toxic waste will still be inside the cell? No mention of physical condition monitoring. If this waste cell is to be left at BH forever there needs to be maintenance monitoring, especially if the side slopes increase to accommodate larger than predicted sediment volume.
25.	Page 9-16 Table 9.2-1	Mi'Kmaq of NS, HHERA "Confirmatory sediment sampling will be completed to confirm Site Specific Target Levels (SSTLs) are met, based on human health sediment contact." The contaminants of potential concern and sediment SSTLs outlined in the final draft HHERA will be utilized, following confirmation with regulators, as well as frequency of monitoring.	There is some concern that the SSTLs have been developed based on non potable groundwater use. Given that the well field is so close and that the site is not municipally serviced it should be categorized as potable.
26.	Page 7-15 Table 7.1-6 and 7.1-7	Containment Cell – Groundwater Levels Based on the existing data, the groundwater water levels indicate that the existing waste in the containment cell, COULD be in contact with groundwater. Assessment within the cell has not been undertaken.	How will groundwater be managed in the existing containment cell as the sediments get moved to the ASB?

Comment Number	Reference to EIS	Context and Rationale	Comment Number
			Will the new design have the base of the liner above the GW levels? If not what protections are in place and what is the impact of the liners being in the GW table?
27.	Page 7-34	Most discussion is on the sediment remediation. However there is mention of site wide metal, VOC and General Chemistry exceedances in soils. Page 7-40 notes the were below the HHERA SSTLs but if these need to be adjusted due to potability what will be the impact. Is there any plan to remediate these soils for the free and unrestricted use of the Site?	If the SSTLs need to be adjusted due to potability what will be the impact. Is there any plan to remediate these soils for the free and unrestricted use of the Site?
28.	Page ii, paragraphs 3 and 4 - <i>Appendix A - HHERA</i>	Cancer risk guideline of 1×10^5 is given, but is not fully explained	what is unit? What is the measure? Should give a bit more explanation for risk measure (lifetime additional cancer risk, etc.)
29.	Page ii, paragraphs 3 and 4 - <i>Appendix A - HHERA</i>	Non cancer risk guideline of 0.2 is mentioned without reference to what it means.	Could be clearer with unit or what it is measuring.
30.	Table E-2- <i>Appendix A - HHERA</i>	Table E-2 presents the conservative estimates but not the realistic estimates to correspond with the text. Either present both or do not discuss both. It could be confusing to someone looking at tables without reading supporting text. Both scenarios should be presented.	It could be confusing to someone looking at tables without reading supporting text. Both scenarios should be presented.
31.	Table E-3, page iv - <i>Appendix A - HHERA</i>	Assumptions for table should either be in the footnotes to the table or notes within the table (four hours per day, 7 days a week, etc.)	Assumptions for table should either be in the footnotes to the table or notes within the table (four hours per day, 7 days a week, etc.)
32.	Table E-3, page iv - <i>Appendix A - HHERA</i>	Table E-3 Could the table include the limit for comparison?	Could the table include the limit for comparison?
33.	Tables, page v, vi – <i>Appendix A - HHERA</i>	Jumped from table E3 to table E5. Not sure why there is no E-4. Either renumber or explain.	
34.	Page 2, paragraph 2 - <i>Appendix A - HHERA</i>	Grammatical error? Should be “tidal mudflat” written as “will become a tidal mudflats”	

Comment Number	Reference to EIS	Context and Rationale	Comment Number
35.	Page 19, paragraph 3- <i>Appendix A - HHERA</i>	Incomplete sentence, or not clear.	Fix sentence: "Post-remediation of the BHETF it is assumed the combined BHSL (and associated basins) and Estuary will serve as a tidal estuary"
36.	Page 26, last paragraph <i>- Appendix A - HHERA</i>	In discussing the limits or guidelines used, a hierarchy is presented. It is not clear to a general reader what this means. If a CCME guideline is not available, then other sources are searched for applicable guidelines.	State more clearly which source would be used for applicable guidelines, and why each source would be used (i.e. no available CCME guidelines would drive the authors to search other sources for guidelines)
37.	Page 90, 4 th paragraph - <i>Appendix A - HHERA</i>	The following sentence seems to create the impression that the guidelines are not useful or relevant. "While the maximum concentrations of several other chemicals in sediments triggered exceedances of sediment quality guidelines, these guidelines are very conservative and based on, at best, toxicity to benthic invertebrates, not plants. Thus, exceedance is not evidence of toxicity, much less toxicity to plants."	Sentence should be changed to support the purpose of guidelines.
38.	Page 102, 1 st paragraph <i>- Appendix A - HHERA</i>	Are potable water guidelines used? "...it is assumed that the land-based areas could be used for residential purposes and potable drinking water obtained from on-site groundwater"	If potable water is possible, then guidelines for potable water should be used.
39.	2020-08-19-EIS-REF-05	Pictou Landing IR24, Groundwater Exploration Study - Phase II, January 2003	Full review could not be completed. Report was missing all figures and appendices. This is important reference material to assess the well field.
40.	2020-08-19-EIS-REF-06	Pictou Landing IR24, 2010 Groundwater Monitoring Program – Final Report, August 2011 Confirmation of wellfield locations.	Is there a more up to date GW Monitoring program available? The data from this report is nearly 11 years old.

Comment Number	Reference to EIS	Context and Rationale	Comment Number
		It is noted that the prior low for MW-3C was recorded in September 2006 and the observed change in elevation (-0.05 m) is not considered to be significant. However, similar to observations made during the last sampling event (November 2009), the calculated hydraulic head level in MW-6 was below sea level and the levels in OW-4 and OW-6 continue to lower. The change in elevation observed in these wells (from November 2009 to December 2010) is significant. As recommended in the 2009 monitoring program report, the water level in MW-6 should be monitored more frequently (e.g., monthly); and a water level logger was installed (by Dillon) in MW-6 during the December field visit. If the water level remains below sea level for an extended period of time, then the water quality of the wellfield could be affected by water from Boat Harbour and/or the Northumberland Strait. The degree to which the aquifer could be impacted will depend on how far below sea level the water level drops and for how long as water	The warning in this report pertaining to the water levels being low in the wellfield and potential interaction with boat harbour waters may warrant additional discussion in the EIS. Especially considering in spots in the EIS it is mentioned that this interrelationship does not exist.
41.	2020-08-19-EIS-REF-08 NPNS Sludge Disposal Cell – Boat Harbour Effluent Treatment Facility 2019 Monitoring Report	It has been noted that subsurface seepage (if any) from the existing sludge disposal cell is anticipated to be collected within the underdrain network, which discharges to the ASB immediately north of the disposal cell.	What is the plan for the removal of the existing underdrain? More specifically the drain pipe going to the ASB that would be a quick release pathway for any future leaks from the re-designed containment cell.
42.	2020-08-19-EIS-REF-08 NPNS Sludge Disposal Cell – Boat Harbour Effluent Treatment Facility 2019 Monitoring Report	“However, based on the results, analysis of VOCs and PAHs was discontinued in 2003 and no further dioxins and furans analysis have been conducted.”	It is understood that one of the issues with the bottom sediments to be dredged is D/F. If these have not been monitored since 2003 is this a concern?
43.	2020-08-19-EIS-REF-11 Data Gap Assessment, GHD	“Fifteen test pits were advanced in the same area and samples analyzed indicated elevated concentrations of metals, PAHs and dioxins and furans. PCB concentrations were non-detect and BTEX concentrations were low or non-detect. TPH values were elevated but are likely non-petrogenic.” This is in reference to the existing containment cell. Data was from “Sampling and Analysis of Dredge Spoils Report – Final Boat Harbour Effluent Treatment Facility Disposal Cell, Pictou Landing, Nova Scotia, GHD Limited. – this report was not supplied with the reference documents.	Did not see this data referenced in the main EIS. Have not seen much discussion on this characterization of the waste in the existing Containment Cell. Full report containing this data should be provided as a reference.

Comment Number	Reference to EIS	Context and Rationale	Comment Number
44.	2020-08-19-EIS-REF-12 Design Requirements Document Boat Harbour Remediation Planning and Design, GHD, Sept 12, 2017 Page 7	“Navigable Channel Size The navigable channel shall be sized to accommodate one vessel at a time under high/low tidal conditions, and be approximately 25 m in wide and 4 m 1 in height to reinstate to original opening size. In accordance with Navigation Protection Act (R.S.C., 1985, c. N-22), all navigable channels shall be a minimum of 8 m wide by 1.25 m high. <u>The depth of the water column will be established based on remedial solution and predicted through hydrodynamic modelling. No subsurface grading is required to create a minimum depth of water under low or high tide</u> ”	During the consultation meetings one of the PLFN community members noted that the depth of water at this crossing is barely deep enough for fish to pass. The highlighted statements are confusing in that the first notes the depth is to be established through modelling, and the second notes no subsurface grading is required. PLFN elders have noted that the water at the old bridge crossing was deep enough for people to jump off the bridge and not touch the bottom.
45.	2020-08-19-EIS-REF-12 Design Requirements Document Boat Harbour Remediation Planning and Design, GHD, Sept 12, 2017 Page 9	Potable Water Supply The bridge shall be designed to accommodate provision of potable water supply to PLFN, in accordance with potable water guidelines (Atlantic Canada Guidelines for Drinking Water Supply Systems). Temporary water supply service will be required during causeway removal and bridge construction activities. Upon completion of bridge construction, permanent water supply services will be reinstated. Permanent water supply services will be conveyed suspended from the bridge, and will require continual electric power source/supply for heat tracing. At a minimum, the potable water supply will require approval from NSE, and potentially Health Canada (due to federal water supply provisions). In the event that power lines over the waterway have to be relocated, approval from Nova Scotia Department of Natural Resources (DNR) will be required.	EXP has heard significant community concern over the temporary water supply. Can this plan be elaborated on? The permanent replacement option. PLFN are in a community growth phases and hope to continue. Will the piping be sufficiently design to incorporate this growth and potentially the addition of pipelines?
46.	2020-08-19-EIS-REF-12 Design Requirements Document	Containment Cell Currently no requirements. Use of the existing containment cell (i.e., sludge disposal cell) and construction of a new (on-Site) containment cell shall both be considered during the	Off Site disposal was not considered an option even back in 2017.

Comment Number	Reference to EIS	Context and Rationale	Comment Number
	Boat Harbour Remediation Planning and Design, GHD, Sept 12, 2017 Page 12	conceptual design of remedial options, provided they meet applicable NSE Landfill Guidelines (i.e., Guidelines for Industrial Landfills (NSE 2005) and Municipal Solid Waste Landfill Guidelines (NSE 2004), as applicable). The existing containment cell likely has sufficient capacity for disposal of contaminated sludge/sediment and soil (based on estimated volumes by NS Lands), and can be re-purposed such that existing permits already in-place (i.e., Industrial Approval) can continue to be used or amended. Construction of a new (on-Site) facility would require new landfill approvals from NSE.	
47.	2020-08-19-EIS-REF-12 Design Requirements Document Boat Harbour Remediation Planning and Design, GHD, Sept 12, 2017 Page 13	Landfill Ownership Landfill containment cell ownership, approval to operate, and associated long-term liability to remain with the Province. In the event that Ownership of the surrounding property is returned/transferred to PLFN, conceptual design of the landfill containment cell shall identify a potential buffer zone around the landfill containment cell to meet the requirements specified in NSE Landfill Guidelines (i.e., Guidelines for Industrial Landfills (NSE 2005) and Municipal Solid Waste Landfill Guidelines (NSE 2004), as applicable).	General Information.
48.	2020-08-19-EIS-REF-12 Design Requirements Document Boat Harbour Remediation Planning and Design, GHD, Sept 12, 2017 Page 13	NS Lands has clarified that although incineration was identified as an unacceptable remediation technology in RFP WS41760868, it can be considered as a viable option. NS Lands has indicated that the most effective technologies for sediment treatment/stabilization and water treatment are the most preferable.	Here and elsewhere Incineration has been mentioned. Elsewhere it is largely dismissed and an undesirable option, but has this been discussed or looked at more seriously. The containment cell remaining on site is also an undesirable option but is being forced through despite significant PLFN objection.
49.	2020-08-19-EIS-14 Laboratory Treatability Study	D/F assessment used the Tier 1 EQS Potable Water Pathway to assess the leachate/pore water from the sediments excavated from the Harbour.	What and where will the holding pond be that will contain the 132,570 L of liquid during the first 6 hours of dewatering from the

Comment Number	Reference to EIS	Context and Rationale	Comment Number
		<p>Overall suite of chemicals for Sediment and Surface water characterization were acceptable and within industry standard.</p> <p>Geotube testing involved testing polymers and coagulants to assess the best mixture for a typical sample on site. They used site water and sediments that would be dredged. But did not include a sample from the existing containment cell. The polymers and coagulants are used to clump the sediments and fine particles so they do not dewater from the tubes.</p> <p>Bench scale Geotubes tested contained approximately 40Litres. Full size tubes will be 100 m long and 5 m diameter. The calculations approximated that 132,570 Litres of water would come out in the first six hours following filling a full sized Geotube.</p>	Geotube while it gets tests or treated for discharge?
50.	2020-08-19-EIS-REF15 Remedial Option Decision Document Boat Harbour Remediation Planning and Design, GHD, May 1, 2018.	Figure 4.1 Page 30. Flow chart clearly shows that Off Site disposal at a new facility was never truly explored or on the table. The chart also does not look at incineration.	Flow chart clearly shows that Off Site disposal at a new facility was never truly explored or on the table. The chart also does not look at incineration.
51.	2020-08-19-EIS-REF15 Remedial Option Decision Document Boat Harbour Remediation Planning and Design, GHD, May 1, 2018.	For the wetlands the Feasibility Concept was taken down to two final approaches. Risk Assessment and Ex-Situ Remediation (Dig and Dispose). Notes that there is 263,000 m ³ of contaminated sludge/sediment and root mass in the former effluent discharge area and settling ponds 1, 2 and 3. Notes that wetlands will be dewatered to open substrate for excavation. In the RODD Feasibility Concept 2 – Ex-Situ Remediation was selected.	The EIS goes against this option and shows that Natural Attenuation is the more preferred option. Further it notes the post remediation monitoring will only be up to 5 years.