

## Enclosure 1: Provincial Advice Record – Crawford Nickel Project Impact Statement

Please submit the completed form by **January 24, 2025**, via the Registry.<sup>1</sup>

### Ministry or Organization Contact Information

<b>Submission Date</b>	February 7, 2025
<b>Ministry/Organization</b>	Ministry of Environment, Conservation and Parks
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Please see questions and guidance in Tables 1, 2 and 3 attached.

MECP

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**Name of Ministry / Organization  
Responder**

Matthew Agombar

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**Title of Responder**

February 7, 2025

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**Date**

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<sup>1</sup> All comments should be submitted via the *Submit a Comment* feature available on the Project's Canadian Impact Assessment Registry page (Reference 83857). Letters and forms can be uploaded using this feature. If you have any difficulties submitting this way, please contact IAAC at [Crawford@iaac-aeic.gc.ca](mailto:Crawford@iaac-aeic.gc.ca) for assistance.

**Table 2. Missing Information in Relation to the Tailored Impact Statement Guidelines**

Table 2 should be used to identify missing or unclear information from the Impact Statement that is **both** 1) required by the Tailored Impact Statement Guidelines **and** 2) required to formulate ministry views to inform the impact assessment.

Deficiency ID	Reference to Impact Statement	Reference to Tailored Impact Statement Guidelines	Description of Deficiency (Context and Rationale)	Advice for Resolving Deficiency
<i>Please identify deficiencies by ministry and number. e.g.: MNR-02</i>	<i>Identify the specific section of the Impact Statement where information is deficient.</i>	<i>Identify the specific section of the Tailored Impact Statement Guidelines where a requirement has not been satisfied.</i>	<i>Provide a brief description of the deficiency, including a rationale for why the information does not meet the requirements of the Tailored Impact Statement Guidelines and how the missing could inform the impact assessment.</i>	<i>Provide a clear and precise description of the missing information that would resolve the issue. Optionally provide other commitments the proponent can make to respond, such as:</i> <ul style="list-style-type: none"> <li><i>offsetting or mitigation to compensate for uncertainty in baseline;</i></li> <li><i>follow-up to verify the accuracy of predictions and effectiveness of mitigation;</i></li> <li><i>applicable guides, standards and thresholds the proponent intends to meet; and</i></li> <li><i>measures the proponent intends to take to comply with other legislative frameworks that provide a means to address effects.</i></li> </ul>
MECP-AIR-01	Chapter 3 – 3.8.1.1		Typically, Sulphur Dioxide is anticipated to result from explosives usage for mining.	Please provide rationale as to why Sulphur Dioxide is not anticipated.
MECP-AIR-02	Chapter 9 – 9.4.1.2 to 9.4.1.4 Chapter 12 – 12.13 to 12.15 Appendix C.1 – 3.2.2 to 3.2.4		Timeframe for data presented in the tables are not indicated.	Please provide the timeframe for data presented within the tables.
MECP-AIR-03	Chapter 9 - Table 9.5 Chapter 12 - Table 12.16 Appendix B.1 - Table 4-1, Table 4-8, Section 4.9 Appendix C.1 - Table 3.5		Baseline data provided within the chapters of the Impact Statement do not match up to data provided within the Appendices (Ex. PM and NOx)	Please confirm data presented in the tables and update accordingly.
MECP-AIR-04	Chapter 12 - Table 12.16 and Appendix C.2 – Table 2.5		The CAS No. indicated for Sulphuric Acid is incorrect	Please review and update accordingly
MECP-AIR-05	Chapter 12 - Table 12.6, Appendix C.2 – Table 2.6		Please review the CAAQS standards presented for Ozone and update accordingly for 2020 and 2025 standards. A note regarding the statistical form for ozone is also missing.	Please update accordingly.
MECP-AIR-06	Chapter 21 – 21 and 21.4.2.1.1		Within the chapter it is stated “Atmospheric Environment (Chapter 12), whereby changes in Project emissions and the associated ambient concentrations may increase the exposure of humans to air contaminants that may affect human health. The deposition of Project emissions to soil may affect soil quality which may, in turn, alter soil-related exposures for human receptors.” Was the deposition of Project emissions to surface water which may affect water quality and human health considered?	Please comment and provide additional rationale.
MECP-AIR-07	Chapter 34 – Table 34.2 and 34.2.3, Appendix E - Table E.2		Clarify which Meteorological parameters are to be measured during Follow-Up Programs. It is recommended to setup additional stations to monitor the ambient air impacts at different locations on-site. It is also recommended to setup an initial monitoring program for VOC's, SO <sub>2</sub> and PAH's.	Recommended to submit an ambient monitoring plan as per the MECP Operations Manual prior to implementation of the sampling program.
MECP-AIR-08	Appendix B.2 – Table 4-1 to Table 4-11		Data includes the number of valid samples but not the total number of samples that were taken and valid data %.	Please provide additional information for each of the tables and parameters.
MECP-AIR-09	Appendix B.2 – Table 4-2		(3) Results between February 6, 2023 and October 2023 are excluded from statistics (Section 4.1).	Provide additional information as to why this data was excluded from the statistics.
MECP-AIR-10	Appendix B.2 – Section 4.5		In the text Table 4-8 is stated as summarizing passive NO <sub>2</sub> and SO <sub>2</sub> data collected. Table 4-8 summarizes the NO <sub>2</sub> continuous data.	Please update accordingly.

MECP-AIR-11	Appendix B.2 Section 4.9 and 4.8		A total of two PAH samples, and eight DPM samples were collected during this baseline study. It is recommended that additional sampling take place to acquire background conditions for a full year.	It is recommended that additional sampling take place to acquire background conditions for a full year.
MECP-AIR-12	Appendix B.2 – Table 5-5		Units provided by NAPS ECCC is ppm, however the data is stated as being ppb within the table.	Please confirm data within the table.
MECP-AIR-13	Appendix C.2 – Table 2.1		Potassium has a SL-MD value listed in the ACB list.	Please reference the SL for Potassium within the tables for comparison against.

*Please insert additional rows as necessary.*