

GENERAL INSTRUCTIONS FOR EXCEL TEMPLATE:

1. Do not leave blank rows above or between comments.
2. Do not modify or delete the instructions or the column headings (*i.e.* the grey areas).
3. Each comment must have an associated topic and recommendation.
4. All formatting (*i.e.* bullets) will be lost when this file is uploaded to the Online Comment Table.
5. If necessary, adjust the cell width and height in order to view all text.
6. Cutting and pasting comments from WORD documents cannot include hard returns (spaces between paragraphs).
7. If you would like to create paragraphs within a single cell, please use a proper carriage return (ALT & ENTER).

TOPIC

COMMENT

Be as specific as you think is appropriate; for example a section or page of the document, a recommendation #, general comment, etc.

Comments should contain all the information needed for the proponent and the Board to understand the rationale for the accompanying recommendation.

Part A : SCOPE AND DEFINITIIONS	Revise definition of decommission to include controlled discharge
Part G: CONDITIONS APPLYING TO WATER AND WASTE MANAGEMENT: Approval process for Decommissioning Plans	EMAB prefers that Decommissioning Plans for each pond be reviewed and approved separate from the closure plan. Any approval through the closure plan will be more general than through specific decommissioning plans so will restrict the ability to adaptively manage decommissioning of ponds, and allow the learnings from decommissioning one pond to be applied to those that follow.
Part G: CONDITIONS APPLYING TO WATER AND WASTE MANAGEMENT: Options for EQC's	As stated in EMAB Undertaking #7, EMAB's stance is that MDMER limits should not be included in the licence, so EMAB recommends G (33), Option B – "Discharge is authorized from components of the Collection Pond System as approved...".

<p>Part G: CONDITIONS APPLYING TO WATER AND WASTE MANAGEMENT: Options for pH regulation</p>	<p>During the Public Hearing, there was lengthy discussion around pH of runoff entering Lac de Gras. As a result, EMAB is in favour of Option B for G (35) and (36). This will ensure safer ranges of pH for aquatic health.</p> <p>Diavik has argued that the pH of natural runoff from East Island can be lower than pH 6. The onus is on Diavik to demonstrate this before any consideration of a lower allowable pH post-closure.</p>
<p>PART I: CONDITIONS APPLYING TO AQUATIC EFFECTS MONITORING: Section 3</p>	<p>It remains EMAB's view that more detail is required on the anticipated revisions to the AEMP resulting from a Decommissioning Plan. It is still unclear to us the approach that Diavik is proposing to the Response Framework for decommissioning</p>
<p>PART J: CONDITIONS APPLYING TO CLOSURE AND RECLAMATION: Section 9</p>	<p>see comments on Part G (27) (e), (g), (h)</p>
<p>Schedule 9, Section 3</p>	<p>A number of conditions within Schedule 9(3) should be tightened up to that it is clear that they are required rather than optional, or where there could be more than one interpretation of the intent</p>
<p>Schedule 9, Section 3 Item (b)(v)</p>	<p>Since this section requires specific sections from the RFD be addressed at a minimum, the word "applicable" should be removed</p>

<p>Schedule 9, Section 3 Item (c)(ii)</p>	<p>EMAB's view is that it would be prudent to control the discharge from a pond until enough data has been collected to reasonably determine the potential effects on aquatic health in the mixing zone and adjacent area.</p>
<p>Schedule 9, Section 3 Item (d)(i)</p>	<p>Suggest removing the word relevant, or defining it, since it can be interpreted in more than one way.</p>
<p>Schedule 9, Section 3 Item (d)(ii)</p>	<p>In EMAB's view a sediment quality investigation is required so "any applicable" should be removed.</p>
<p>Schedule 9, Section 3 Item (d)(vi)</p>	<p>EMAB's view is that the investigations identified in 3(d)(vi) are required prior to submission of a decommissioning plan to allow assessment, and possible mitigation, of potential harm to aquatic health. Item should be re-worded to clarify this.</p>
<p>Schedule 9, Section 3 Item (d)(ix)</p>	<p>EMAB's view is that the investigations identified in 3(d)(ix) are required prior to submission of a decommissioning plan to allow assessment, and possible mitigation, of potential harm to aquatic health. Item should be re-worded to clarify this.</p>
<p>Schedule 9, Section 3 Item (f)</p>	<p>It is EMAB's view that all the items listed in item (f) are required to be monitored, so the words "any applicable" should be removed.</p>

<p>Schedule 9, Section 3 Item (f)(ii)(4)</p>	<p>Diavik's Mixing Zone Discussion Paper is clear that the bulk of the expected discharge will occur over periods of a few days each year following freshet or large precipitation events. It is EMAB's view that the sampling design must take this into account. We are concerned that the words "Consideration of" could be interpreted as not requiring targeted water sampling.</p>
<p>Schedule 9, Section 3 Item (b)(v)</p>	
<p>Schedule 9, Section 3 Item (d)(vii)</p>	<p>This appears to be a duplication of Item (b)(iv)</p>
<p>Schedule 9, Section 3 Item (e)(iii)</p>	<p>To be consistent with the wording of the rest of this item EMAB suggests "appropriate" be replaced by "sufficient."</p>
<p>Schedule 9, Section 3 Item (f)(ii)(6)</p>	<p>Sediment sampling should be done before and after decommissioning because of the potential to disturb sediment during the decommissioning process</p>

RECOMMENDATION

Recommendations can be for the proponent or for the Board. Recommendations should be as specific as possible, relating the issues raised in the "comment" column to an action that you believe is necessary.

Include an activity to allow water to flow from the structure, to allow for controlled discharge to be included within the definition (see Schedule 9(3)(c)(ii))

Revise Part G (27) (e), (g), (h) etc to require separate approval for each Decommissioning Plan for a collection pond.

EMAB recommends Option B for section G(33).

EMAB recommends Option B for section G(35) & (36).

Add more detail regarding the scope of the anticipated revisions to the AEMP with respect to the Response Framework.

see recommendation on Part G (27) (e), (g), (h)

Recommended changes to wording are presented below.

Recommended changes to wording:
"A conformity table identifying how applicable direction from the Board's Reasons for Decision for Version 4.1 of the Interim Closure and Reclamation Plan was addressed, including at minimum Decision 7, Revisions 5, 6, 9, 10, 15, 16, 17,18; Engagement Requirements 2, 3;"

Recommended changes to wording:
Description of how the Company ~~considered whether a~~
will control Discharge ~~may be an appropriate~~ during
initial research activity, and duration of control period,
prior to reconnection.

Recommended changes to wording:
Summary of ~~relevant~~ historical data for runoff, seepage,
collection ponds, and/or the Receiving Environment;

Recommended changes to wording:
Results of ~~any applicable~~ sediment quality investigation

Item (d)(vi) should be reworded to clarify the required
investigations that must be done prior to submission of
a Decommissioning Plan.

Item (d)(ix) should be reworded to clarify the required
investigations that must be done prior to submission of
a Decommissioning Plan.

Recommended changes to wording:
“Details of ~~any applicable~~ monitoring to be completed
prior to, during, or following the Decommissioning of
collection pond, including but not limited to:”

Recommended changes to wording:
~~Consideration of~~ A plan for targeted water sampling during periods of maximum predicted effects.

Consider including Revision 13 of RFD for ICRP 4.1, “Clearly identify in the body of the CRP where research results have informed the proposed plan”, in the list of minimum requirements to be addressed.

A description of the parameter screening completed, including rationale for whether the existing requirements of Part G are ~~appropriate~~ sufficient, or additional/revised effluent quality criteria may be required

Reword to clarify that sediment sampling should be done before and after decommissioning.





































