

AANDC Proposed Action Level for PM₁₀ 24 hour averaging period above 50 micrograms/m³

Alternatives North Comments (as tracked changes)

The Northwest Territories (NWT) does not have a standard for PM₁₀, but instead adopts a 24-hour average criterion of 50µg/m³. This level is used in several Canadian jurisdictions, including British Columbia, Ontario and Newfoundland and Labrador.

The Site-Wide Air Quality Monitoring Program continually measures for PM₁₀ using Beta Attenuation Monitors (BAM) at community stations - YCC (marina), NDIL (Ndilo) and NAPS (Sir Franklin School). The 24 hour PM₁₀ values are calculated from the continuous monitors. The Site-Wide Air Quality Program also performs 24 hour high volumetric PM₁₀ sampling every three days.

Comment [K1]: Please clarify whether this includes the Fenceline program. If not, it should be included within the scope of the Action Level. There should be a separate paragraph to describe the Fenceline program.

The Roaster Complex Decontamination and Demolition also collects 24 hour PM₁₀ samples on a three day cycle.

Comment [K2]: Alternatives North is already on record as stating that this cycle should be reduced to daily, at least until there is sufficient experience to understand the effectiveness of mitigation measures and the relationship between PM10 and arsenic.

Both programs report the results in comparison to the 50 ug/m³ target.

Any exceedance of the 24-hour average criterion of 50µg/m³ would initiate:

- a) The AANDC Inspector and MVLWB will be notified within 10 days of any exceedances. The notification will include details on any remedial actions taken to rectify the exceedances. Remedial actions that will be triggered by an exceedance include, but are not limited to, additional dust suppression agents on roads and work areas, additional scaffolding and negative air pressure wrapped areas, [whatever else AANDC would like to include];

Comment [K3]: AANDC should provide a list of potential remedial actions that would be triggered by an exceedance. Otherwise the only action is a report to the Inspector and the MVLWB.

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AANDC will collaboratively review the Dust Management Plan and monitoring program results as required with the Giant Mine Working Group at the end of the 2013 season. If required, the Dust Management Plan will be updated and as previously committed we will consult on any proposed changes with the Working Group.

Prepared by Kevin O'Reilly

July 18, 2013

From: [Tyree Mullaney](#)
To: permits@mvlwb.com
Subject: FW: Giant Project Working Group - Proposed Board response on PM10 management
Date: Friday, July 19, 2013 8:33:28 AM
Attachments: [AN Comments on AANDC Proposed PM10 Action Level for 24 hour Period.docx](#)
Importance: High

MV2012L80010 – Giant Mine Water Licence.

Reports Studies other.

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From: kevin o'reilly [mailto:kor@theedge.ca]
Sent: July 18, 2013 9:28 PM
To: Jane.Amphlett@aandc-aadnc.gc.ca
Cc: Morag.McPherson@DFO-MPO.GC.CA; Amy.Sparks@EC.gc.ca; reganalyst@nsma.net; walexander@yellowknife.ca; tslack@ykdene.com; Adrian.Paradis@aandc-aadnc.gc.ca; Erika_Nyyssonen@gov.nt.ca; Belinda.Campbell@pwgsc-tpsgc.gc.ca; Chris.Doupe@pwgsc-tpsgc.gc.ca; cgreencorn@yellowknife.ca; dkefalas@yellowknife.ca; jhumble@yellowknife.ca; kkronstal@yellowknife.ca; tyree@mvlwb.com; gordon.hamre@gmail.com; Clint.Ambrose@aandc-aadnc.gc.ca
Subject: Re: Giant Project Working Group - Proposed Board response on PM10 management
Importance: High

Please find attached a response from Alternatives North to the proposed PM10 Action Level for a 24 hour period. Our comments are found as tracked changes and comments in a Word document. If you have any questions, please reply by e-mail.

Kevin O'Reilly
Alternatives North

----- Original Message -----

From: Jane Amphlett <Jane.Amphlett@aandc-aadnc.gc.ca>
Date: Monday, July 15, 2013 15:17
Subject: Giant Project Working Group - Proposed Board response on PM10 management
To: Morag McPherson <Morag.McPherson@DFO-MPO.GC.CA>, Amy Sparks <Amy.Sparks@EC.gc.ca>, "reganalyst@nsma.net" <reganalyst@nsma.net>, kevin o'reilly <kor@theedge.ca>, Wendy Alexander <walexander@yellowknife.ca>, "tslack@ykdene.com" <tslack@ykdene.com>
Cc: Adrian Paradis <Adrian.Paradis@aandc-aadnc.gc.ca>, Erika_Nyyssonen@gov.nt.ca, Belinda Campbell <Belinda.Campbell@pwgsc-tpsgc.gc.ca>, Chris Doupe <Chris.Doupe@pwgsc-tpsgc.gc.ca>, Chris Greencorn <cgreencorn@yellowknife.ca>, Dennis Kefalas <dkefalas@yellowknife.ca>, jhumble@yellowknife.ca, kkronstal@yellowknife.ca

> Hi all,

> As part of the approval of the Roaster Detailed Deconstructin Plan the MVLWB directed

AANDC to develop a management response (action level) for PM₁₀ based on a 24 hour averaging period, set at 50 micrograms/m³. Below is a draft response to the MVLWB direction. Prior to submitting to the Board we would like to get feedback from the Working Group.

> Proposed Response

> The Northwest Territories (NWT) does not have a standard for PM₁₀, but instead adopts a 24-hour average criterion of 50µg/m³. This level is used in several Canadian jurisdictions, including British Columbia, Ontario and Newfoundland and Labrador. The Site-Wide Air Quality Monitoring Program continually measures for PM₁₀ using Beta Attenuation Monitors (BAM) at community stations - YCC (marina), NDL (Ndilo) and NAPS (Sir Franklin School). The 24 hour PM₁₀ values are calculated from the continuous monitors. The Site-Wide Air Quality Program also performs 24 hour high volumetric PM₁₀ sampling every three days. The Roaster Complex Decontamination and Demolition also collects 24 hour PM₁₀ samples on a three day cycle. Both programs report the results in comparison to the 50 ug/m³ target. Any exceedance of the 24-hour average criterion of 50µg/m³ would initiate:

- > a) The AANDC Inspector and MVLWB will be notified within 10 days of any exceedances. The notification will include any remedial actions taken to rectify the exceedances;

> AANDC will review the Dust Management Plan as required at the end of the 2013 season. If required, the Dust Management Plan will be updated and as previously committed we will consult on any proposed changes with the Working Group.

> We are requesting any comments on the proposed response be submitted by **Friday, July 19, 2013 to Adrian Paradis, Regulatory Manager.**

> Thanks

> Jane

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> Jane Amphlett, MAsc, P.Eng.

> Operations Manager

> Giant Mine Remediation Project

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