Identifier	Topic	Reference to EIS/EA Report	Summary of Previous Comment	Summary of Proponent's Response to Previous Comment	Follow-up comment/ Request for Information	New Proponent Response	Subsequent Comment
			Date: March 2014 *EMRB-2*	*Date: June 2015*	*Date: August 2015*	*Date: November 2015*	

EMRB-2B	Air Quality		In addition, the report states that emission rates were further reduced by a conservative correction factor of 75% to account for the noted biases in the emission factors and the model itself. It is unclear however, whether the emission rates used in the model were adjusted to include this correction factor, particularly for the unpaved roadways, since insufficient information was provided to allow any spot checks of the correlation between the emission calculations and model inputs. As an example, segment lengths, vehicle trips, and weight for individual roadways were not provided. As such, the emission calculations for road dust and metals could not be verified. Details of whether this approach was used to reduce the emissions from any specific sources at the site should be included in the report.	A conservative control factor of 80% was applied to all the unpaved roads on the surface and within the open pit to account for the following:
				• Natural mitigation
				  ○ 160 days per year with measurable precipitation or snow cover
				  ○ 160/365 = 43.8%
				• Dust controls that will be implemented through a Best Management Practices Plan
				  ○ Watering – 75% (Australian Government "National Pollutant Inventory Emission estimation Technique Manual for Mining: Version 3.1, January 2012, Table 4, Level 2 watering, greater than 2 L/m^2
				
				The overall control factor is the product of the individual control factors when more than one control is applied. Therefore the controlled emissions would be as low as 14% of the uncontrolled emissions.
					The approach to calculate control factors for mitigation measures through watering and/or natural mitigation is reasonable for predicting annual average concentrations. Short term (i.e. 24-hour) maximum dust concentrations typically occur on days without rain. As such, it is not reasonable to consider/include natural mitigation when predicting short term 24-hour concentrations.	CMC acknowledges EMRB's concern that applying a control factor that accounts for natural mitigation of dust from roadways due to precipitation days in a year may not be conservative to apply to shorter averaging times such as 24-hr or shorter. However, CMC's technical consultant (Golder Associates Ltd.) considers that the 80% control factor applied to fugitive dust emission estimates from roadways remains appropriate and justifiably conservative to use in this assessment at this time. As indicated in the Atmospheric Environment Technical Support Document, the proponent has committed to preparing and implementing a Fugitive Dust Best Management Practices Plan (BMPP). Based on industry experience, the MOECC Environmental Approvals Branch has previously accepted Emission Summary and Dispersion Modelling Results with reductions as high as 90% of 24 hour SPM emissions due to the implementation of an effective BMPP. Control measures such as road watering will be preferentially applied on days without rain to control dust emissions. Furthermore, as a part of this BMPP, the fugitive dust on actual facility roadways will be characterized to obtain site-specific information regarding actual silt loadings on roadways, size fractions of dust and metals contents, at which point a more robust assessment of road dust emissions from the Facility can be completed using site-specific data and which takes into the actual effects of the BMPP.	EMRB-2C