



facsimile

TRANSMITTAL

to: Erik Madsen - Supt. of Environmental Services
fax #: (403) 669-9424
re: Comments on the EPB report on reducing As Releases in the N.W.T.
date: January 4, 1996
pages: 1, including cover sheet.

I have reviewed the December 15, 1995 report "Reducing Arsenic Releases to the Environment in the Northwest Territories - Action Plan to Develop Control Options - Draft for Consultation" and offer the following comments:

- 1) The approach proposed by EPB of Environment Canada is well thought out and takes into account all of the technical and socio-economic issues that need to be considered in dealing fairly with this issue. I am, however, concerned with the proposed time scale. Specifically I do not believe that there has been sufficient time budgeted between now and the end of March 1996 to do an adequate job in collecting, assembling and interpreting all of the technical and socio-economic information that will be required to propose management options that properly take into account all of the factors needed. If the comprehensive report does not include sufficient information on all of the technical and socio-economic factors surrounding this issue then the public will not be adequately informed and thus will not be in a position to meaningfully participate in reaching consensus on an appropriate management options for the reduction of arsenic emissions. Without an adequately informed public this consensus will be reached on the basis of emotion rather than on a sound evaluation of risk.

From the desk of...

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- 2) The decision to not consider water borne releases of arsenic to the environment could lead to the development of management options that could mislead the public. It is necessary to consider the total release of arsenic to the environment from a processing facility when considering alternative technologies. It would not be in the public interest to consider air emissions in isolation when evaluating alternative emission reduction technologies as one technology may reduce air emissions but result in higher water borne emissions. It is also important to consider the time scale over which the releases occur, ie. air emissions are totalled at the time of release however solid sludges produced by an alternative technology may release arsenic to the environment over an extended time period of hundreds of years. The evaluation needs to reflect this difference so that the comparison is fair, ie. apples to apples and not apples to oranges.
- 3) To adequately inform the public the comprehensive report should include a quantitative probabilistic risk assessment of the impact on human health and the receiving environment that results from each of the management options that are being proposed in the comprehensive report. This should then be compared with the risk as calculated by a similar analysis that is associated with the current emission situation.

Sadek E. EL-Alfy will not be back until January 08th so I suspect he has not yet had an opportunity to read or comment on the draft report. I would think that we should be able to provide EPB with our comments by January 12,1996.

cc: Sadek E. El-Alfy
M.K. Witte

