



FALCONBRIDGE

Falconbridge Limited
Box 40, Commerce Court West
Toronto, Canada M5L 1B4
Telephone 416/863-7000
Telex 065-24211 Rapifax 364-8986

December 20, 1991

Mr. David McBain
A/Chief
Chemical Evaluation Division
Environment Canada
Ottawa, Ontario K1A 0H3

Dear Mr. McBain:

Your letter of November 14, 1991 and the preliminary document on 'Arsenic and its Compounds' were received November 21, 1991 and have been studied with interest. This review is still in progress and we hope that time is available to do justice to the very comprehensive and extensive work carried out by your department by providing useful current industrial information.

We also look forward to receiving the outstanding sections 7, 8, 9, 10, 14 and 15 in due course for our review.

On an interim basis our comments are as follows:

Pertinent Studies and Data

Smelter Emissions

Significant changes have occurred at most smelters and roasting plants over the past five years which have reduced arsenic emissions and/or ground level concentrations.

These changes have been recorded on internal reports and/or reports to Provincial authorities. Contact has been made with most of these companies with an invitation to supply updated figures for assembly and forwarding to you by the Mining Association of Canada and/or the Ontario Mining Association.

Information has started to arrive but another 3 - 4 weeks is required to get a reasonably representative package with suitable/appropriate annotation.

Critical Studies

It is our understanding that the scientific assessment of risk to human health and the environment requires:

- Reliable information on exposure history including chemical species and particulate size and shape.
- Reliable information on effects correlated to exposure history supplemented where practical by controlled laboratory tests.
- Reliable information on current discharges and receiving medium concentrations and hence current risk.
- Evaluation of the benefits to be expected from measures already scheduled for implementation to change, modify or otherwise improve processes.

Current additional information is being gathered on each of these subjects.

Irrelevant Studies

Historical data may have a place in records for documenting improvements and correlating with human health effects, and soil/sediment analyses. Possibly historical data could be replaced with equivalent current data with the historical data relegated to an appendix. Further thought is being given to this and also the mixing of data from the smelting, lumber and insecticide industries.

Study Conclusions

Reservations have been expressed about validity of certain conclusions. Again we would appreciate a little more time for further review and thought before detailing these items.

An 'in depth' evaluation of the quality and relevance of the information provided in tables 6, 7, 9, and 10 to the mining industry also requires more time than provided to date.

Summary

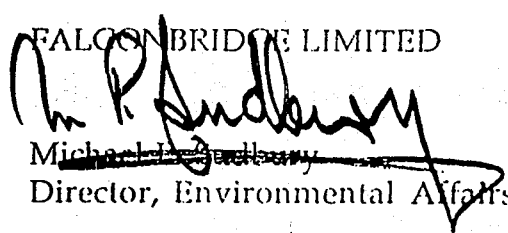
A close review of the Arsenic Document provided is underway by the Canadian Mining Industry.

A search for relevant current discharge information on arsenic from non-ferrous smelters and gold operations is in progress.

More time is required to make a useful contribution.

Yours truly,

FALCON BRIDGE LIMITED


Michael L. Gaultney
Director, Environmental Affairs