COMMENT – T-17

Source: Canadian Environmental Assessment Agency

Summary of Comment

It is not clear whether the Proponent intends to conduct ambient air quality monitoring during the construction phase. An ambient air quality program should be conducted during both the construction and operation phases for this Project to verify the accuracy of the predictions related to the environmental effects on air quality. Follow-up monitoring will also assist in determining the effectiveness of mitigation and facilitate the development of adaptive management measures, should there be any unanticipated adverse environmental effects.

It is not clear if the concentrations in Table 3-9 include emissions from mobile sources and background concentrations. These concentrations warrant the inclusion of NOx emissions in the ambient monitoring program.

Undertake real time ambient air monitoring during site preparation, construction and operation phases for TSP, PM_{10}, PM_{2.5}, and NOx at a minimum.

Given that mobile vehicle exhaust emissions represent a significant source of PM_{10} and PM_{2.5}, and that HC considers that PM_{10} and PM_{2.5} have no threshold for adverse health effects, PM monitors could be used to track PM emissions which could then be compared with exhaust emissions calculated with the U.S. EPA MOBILE6 emissions model.

Proposed Action

Provide a framework for an ambient air monitoring program during construction which is to include the use of PM monitors and action levels that may trigger certain mitigations as part of the Follow-up Monitoring Program in consultation with relevant regulatory agencies including EC.

Reference to EIS

AESTD Report Section 7.0 Monitoring pg. 113 Section 3.4 Monitoring

EIS Report Table 8-3 pg. 8-15 & 8-17 Response to IR HC-5 Response to IR HC-8 Response to IR HC-10

Response

Table 3-9 illustrated the sources that were considered for the assessment that was carried out for Ontario permitting in accordance with MOE guidance, which does not require including mobile exhaust emissions. Modelling was completed for all emissions sources for the Project, including mobile exhaust emissions. Results of this modelling were passed on to be assessed in the HHERA and are also shown in the response to Comment MOE-Air 2.

Canadian Malartic Corporation has committed to air quality monitoring throughout the Construction and Operations Phase of the Project. A detailed air quality monitoring program will be submitted to the province for discussion prior to the start of the Construction Phase. This plan will consider the guidance outlined in the Ministry’s Operations Manual for Air Quality Monitoring in Ontario. Canadian Malartic Corporation will work with
regulators to determine reasonable parameters and frequency of sampling for monitoring during Operations and Construction Phases.