

GENERAL INSTRUCTIONS FOR EXCEL TEMPLATE:

1. Do not leave blank rows above or between comments.
2. Do not modify or delete the instructions or the column headings (*i.e.* the grey areas).
3. Each comment must have an associated topic and recommendation.
4. All formatting (*i.e.* bullets) will be lost when this file is uploaded to the Online Comment Table.
5. If necessary, adjust the cell width and height in order to view all text.
6. Cutting and pasting comments from WORD documents cannot include hard returns (spaces between paragraphs).
7. If you would like to create paragraphs within a single cell, please use a proper carriage return (ALT & ENTER).

<u>TOPIC</u>	<u>COMMENT</u>	<u>RECOMMENDATION</u>
<i>Be as specific as you think is appropriate; for example a section or page of the document, a recommendation #, general comment, etc.</i>	<i>Comments should contain all the information needed for the proponent and the Board to understand the rationale for the accompanying recommendation.</i>	<i>Recommendations can be for the proponent or for the Board. Recommendations should be as specific as possible, relating the issues raised in the "comment" column to an action that you believe is necessary.</i>

Item Number	Topic	Comment	Recommendation
1	General Comment	The Incinerator Management Plan contains a far greater level of detail and specifics than any of the other parts of the overall Plan or the other three components (Hazardous Waste, Landfill Management or Hydrocarbon Impacted Materials Management).	DDEC should provide a comparable level of detail in the Hazardous Waste, Landfill Management and Hydrocarbon Impact Material Management plans, as that found in the Incinerator Management Plan.
2	General Comment	There is no cross-referencing of any Standard Operating Procedures (if such detailed procedures exist). An overall waste decision tree would be helpful to better develop links amongst the plans and to provide guidance to staff (for example, some plastic is recycled while others are land filled or if I have a battery what is the waste stream/procedure to dispose of it)	DDEC should better integrate the plans as presented. Detailed Standard Operating Procedures should be cross-referenced (if they exist). An overall decision tree on waste types and handling should be developed and included as part of the overall plan.

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3	General Comment	Numbering of headings or some other method of better organizing the Plan would help with locating materials and information (i.e., there is no overall page numbering from beginning to end).	Section and consecutive page numbering would make it easier to find information in the document.
4	Management of Waste	There is no listing of staff positions or an organization chart to get a better understanding of roles and responsibilities.	DDEC should include a description of roles and responsibilities for waste at Ekati. An organizational chart and staff or position listing may prove helpful.
5	Management of Waste	There is no mention of the orientation and/or training given to guests and employees upon entering the site regarding waste management and segregation. Also practices implemented including locating waste segregation bins around site.	Include a description of the training and practices implemented to provide to all employees and/or guests, not just those handling the disposal of waste.
6	Solid Waste Landfill Management Plan, s. 5, pg. 5	The first sentence of the last paragraph reads, "Waste that meets the criteria for one of or more of nine United Nations hazard classes must be delivered to the Waste Management Building (picture, left)." It is not clear what these criteria are and they are not referenced in any way.	DDEC should list the UN hazard class criteria that apply at Ekati and clarify what the hazardous waste classes are that cannot be handled at the Solid Waste Landfill and cross-reference this section with the other parts of the Plan. A waste decision tree (see comment above) may prove helpful.
7	Solid Waste Landfill Management Plan, s. 6, pg. 6	Section 6.2 provides a long list of materials not approved for the landfill but it is unclear where these materials should be taken.	DDEC should clarify where the materials not approved for the landfill should be taken. A waste decision tree (see comment above) may prove helpful.
8	Hazardous Waste Management Plan, s. 5, pg. 5	This section starts with "The following factors must be strictly monitored when storing hazardous wastes in the Waste Management Hazardous Waste Yard." No details are provided on what is to be monitored, how, by whom and how it is to be recorded and reported.	DDEC should provide some details on what monitoring takes place in the Hazardous Waste Yard, its frequency, by whom and how this information is recorded and reported.
9	Hazardous Waste Management Plan, s. 8 and 9, pg. 5-6	These two sections discuss the waste manifest and tracking system. No blank forms are attached (as is the case for the Incinerator Management Plan) and there is no discussion of the reconciliation process for the final disposal of hazardous wastes.	DDEC should add blank forms as appendices to this section and describe the reconciliation process for waste handling.

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10	Incinerator Management Plan, Table 4, pg. 8	Two of the older incineration units have been decommissioned with one removed from the site. It would be helpful to know if there are any special requirements for the proper removal and disposal of these units. For example, are they taken off site, returned to the manufacturer, any special cleaning requirements or handling on site.	DDEC should provide some details on the decommissioning (any special handling or treatment) of the older incinerator units at site.
11	Incinerator Management Plan, s. 3.5.1 Ash Management, pg. 14	The first complete sentence on this page reads, "All effort should be made to disturb the as must be reasonably possible." This sentence does not make sense.	DDEC should correct this sentence.
12	Incinerator Management Plan, s. 3.5.1 Ash Management, pg. 14	The fourth paragraph states, "The resulting analysis confirms that the ash does not contain any hazardous properties and is compliant with the Ekati Diamond Mine's landfill requirements." It is not clear what the "landfill requirements" are and how the results of the ash sampling will be publicly reported.	DDEC should indicate clearly how the ash sampling results will be reported and what the landfill requirements are for disposal in that facility.
13	Incinerator Management Plan, s. 3.6 Records and Reports, pg. 15	This section mentions how "out-of-specification situations are raised immediately and the incinerator will not be used until maintenance or remedial measures have been applied." It would be helpful to know what the out-of-specification situations are (e.g. temperature ranges?).	DDEC should provide a table or information on what it considers to be "out-of-specification situations" are for the incinerators at the site.
14	Incinerator Management Plan, s. 6.0 Emissions Monitoring, pg. 19	While DDEC has conducted one session of stack testing, it is not clear when or how often further stack tests will be conducted to ensure efficient and environmentally sound operations continue.	DDEC should clearly indicate the frequency and public reporting for further stack tests of the incinerators at the site.
15	Incinerator Management Plan, s. 7.0 Conclusion, pg. 20	The last sentence of this section should be expanded and/or moved to the front part of the Plan in the "Source Reduction" section along with other good environmental practices at the Mine (e.g., no single serving juice boxes at the site).	DDEC should give itself more credit for its sound source reduction of plastics in the cafeteria and other waste reduction initiatives at the site.

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16	Public Reporting	While there are a few scattered references to public reporting (e.g., solid waste audits reported in the Wildlife Effects Monitoring Program report), it is not clear how DDEC will report on the implementation of this Plan and provide any operational highlights or incidents.	DDEC should create a section in the Plan that provides details on public reporting on implementation, operational highlights and incidents.