

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	Source of Potassium and Source Reduction (s. 2.3, pg. 2-4)	The Potassium Response Plan states that the source of the potassium downstream of the Long Lake Containment Facility is the process plant and the underground kimberlite ore. DDEC does not provide any data with regard to how potassium levels may vary at depth in minewater in the various underground operations or data on potassium in minewater over time. This information would be helpful in considering source reduction.	DDEC should provide data with regard to how potassium levels may vary at depth in minewater in the various underground operations and data on potassium in minewater over time to better describe the source of the water quality issue.

Item Number	Topic	Comment	Recommendation
2	Investigations (s. 3.1, pg. 3-1)	While the Agency is supportive of further investigations on the toxicity of potassium to aquatic life, we wonder about the possibility of using local species rather than fathead minnows.	DDEC should provide some justification for choosing a non-native fish species for the potassium toxicity investigations.
3	Investigations (s. 3.1, pg. 3-1)	Daphnia is not the cladocera genera in decline downstream of the LLCF Holopedium has been declining for at least five years according to the 2014 AEMP report (pg. 3-166). DDEC should consider using Holopedium in addition to Daphnia in its toxicity investigations.	DDEC should consider using Holopedium in addition to Daphnia in its toxicity investigations.
4	Medium and High Action Levels (s. 3.3, pg. 3-3)	The Agency had expected to see some mention of water treatment for potassium as one of the options as a high action level response.	DDEC should provide information on water treatment for potassium as an option for a high action level response. This information should include the feasibility of using water treatment, the (rough) cost of doing so and evidence that such treatment would be effective.

Item Number	Topic	Comment	Recommendation
5	Schedule and Recommended Next Steps (s. 4, pg. 4-1)	DDEC detected potassium in samples below the LLCF that were higher than the SSWQO as early as April 2013. DDEC was to submit the Potassium Response Plan on February 1, 2015. It received an extension to March 31 and is now seeking an additional extension to complete the Plan until November 30, 2015. By the time the full Plan is approved, it could be three years after the original exceedance was detected. The Agency does not support these delays that are contrary to the Precautionary Principle that DDEC committed to as part of the Environmental Agreement and effective environmental management.	The WLWB should direct DDEC to submit a revised and complete version of the Plan as soon as possible and not later than August 1, 2015. The Agency believes that the current SSWQO was rigorously and reasonably developed and suggesting that a new and improved SSWQO can wait for such a long time is not reasonable.