



# Interior Health

July 18, 2012

Lindsay McDonough  
Project Assessment Officer  
Environmental Assessment Office  
1-836 Yates St  
Victoria, BC V8W 1L8

Dear Ms. McDonough,

**Re: Detailed Modeling Plan Review and Sub Working Group Participation**

Upon review of the below noted documents prepared by Stantec Consulting Ltd., it has been determined that Interior Health (IH) does not have adequate technical capacity to provide detailed comments on study design and methodology.

- A Detailed Noise Modeling Plan for the AJAX Mine Project - Draft  
Stantec Consulting Ltd. April 29, 2012.
- A Detailed Dispersion Modeling Plan for the AJAX Mine Project - Draft  
Stantec Consulting Ltd. April 29, 2012.
- Human Health and Ecological Risk Assessment for the Ajax Mine Project – Draft  
Stantec Consulting Ltd.

As articulated through previous communications from IH, the proposed AJAX project is unprecedented in respect of the potential noise and air quality impacts on an urban centre. We have been unable to identify recognized better management practices including pre-assessment and monitoring methods and associated benchmarks against which IH Health Protection (IH-HP) staff can objectively gauge that the proposed project is reasonably assured not to constitute a public health hazard. IH-HP participation in the Environmental Assessment process is aimed principally at assessing proposals against recognized industry better practices for managing potential environmental health hazards. It is beyond the scope of our regional health agency to guide the creation of defensible better practices for the construction, operation and decommissioning of major industrial projects.

Such practices are typically established at a provincial, federal or international level where there are commensurate technical, academic, and administrative resources required to undertake the research (e.g. establishing Base Level Industrial Emission Requirements) and consultation to support such materials.

We strongly recommend that qualified third party consultants experienced in human health risk assessment be engaged to participate in the review of the study design and methodology plans and associated sub working groups.

Interior Health will not be attending the sub working group meetings pertaining to study design and methodology. Interior Health will continue to review and provide comment on updated versions of the draft application information requirements, the finalized application information requirements and the application once submitted.

Sincerely,

A handwritten signature in blue ink, appearing to be 'M. Palm', written over a light blue horizontal line.

Misty Palm, BTech, CPHI(C)  
Environmental Health Officer  
Interior Health Authority