



Snap Lake Environmental Monitoring Agency
Main Floor, Lahm Ridge Tower
4501 Franklin Avenue
P.O. Box 95, Yellowknife, NT X1A 2N1
Phone: 867-765-0961 FAX: 867-765-0963
Website: www.slema.ca

June 29, 2015

Ms. Erica Bonhomme
De Beers Canada Inc.
Snap Lake Project
Suite 300, 5120-49 St.
YELLOWKNIFE NT X1A 1P8 Email: erica.bonhomme@debeersgroup.com

Subject: 2014 Incinerator Stack Testing Results

Dear Erica,

The Snap Lake Environmental Monitoring Agency (SLEMA) met on June 25, 2015 to discuss the 2014 Snap Lake Incinerator Stack Testing Report submitted on January 29, 2015 by De Beers Canada to Environment Canada (EC) and the Government of the Northwest Territories (GNWT). This report was reviewed by SLEMA and was followed by email communications between De Beers and SLEMA.

On February 10, 2015, SLEMA's Environmental Analyst sent a note to De Beers, noting the two Ketek incinerators installed at Snap Lake in 2013 were capable of meeting the Canada Wide Standard (CWS) on dioxins and furans of 80 pg TEQ/m³, but pointing out the results of stack testing showed the average emissions to be between 6 and 65 times higher than the CWS, with one testing result (84 pg TEQ/m³) being very close to the CWS. SLEMA also noted that De Beers identified the root cause as not following standardized work practice, and retrained the related site services staff and revised the SHEOP. SLEMA asked whether De Beers verified that all waste diverted to the incinerators was composed of combustible material, and whether plastics were present in the incinerator waste stream. SLEMA also asked if De Beers had plans to ensure compliance with dioxins and furans standards, and whether it would conduct additional stack testing to confirm the incinerators' performance.

In its February 11, 2015 email reply to SLEMA, De Beers stated it was working with EC and GNWT to develop a process for improving incinerator management, based on its review of the current operational practices. De Beers noted it had a confirmation from Ketek that the incinerators were capable of meeting emissions standards, and based on these facts, did not plan to undertake further testing. De Beers also indicated it would discuss this issue with EC and GNWT and would submit a follow up letter discussing the findings and path forward.



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More than four months have passed since the last communication from De Beers on this important issue. Admittedly, SLEMA is extremely concerned about De Beers' failure to meet dioxin and furan CWS and, as importantly, about the lack of regulation of air emission in the territory. Therefore we are respectfully requesting a **formal update** on the situation.

By copy of this letter to the Government of the Northwest Territories, we are also requesting this issue in particular, and the issue of air emissions in general, be brought to the attention of the Snap Lake Liaison Committee for discussion and follow up.

Sincerely,

ORIGINAL SIGNED BY:

Rachel Crapeau
Chair

c.c. Monica Wendt, GNWT-ENR
Matthew Seaboyer, GNWT-ENR
David Fox, Environment Canada