



Province of
British Columbia

Coal Guidelines Steering Committee
c/o ELUC Secretariat
Legislative Buildings
Victoria, B.C. V8V 1X4

Quinsam Coal file
007574

1980-08-13

MEMORANDUM TO:

Coal Guidelines Steering Committee
and
Selected Participants,
Coal Guidelines Review Process

DEPT. OF MINES AND PETROLEUM RESOURCES		
Rec'd	AUG 14 1980	
<i>JK</i>		

RE: DRAFT STAGE II SUBMISSION - QUINSAM COAL PROJECT

file ←

Under cover of the attached 1980-08-11 letter from Douglas Smith (of Luscar Ltd.), we have received a draft 4-volume Stage II submission for the Quinsam Coal Project.

I would appreciate it if you would undertake a preliminary review of the contents of the submission to determine whether or not it meets the spirit and intent of the Guidelines for Coal Development, and thus should be approved for wider provincial circulation and review. I would stress that the purpose of the present review is to determine whether or not all important topics are addressed, not to examine the contents in detail. Your general assessment should be telephoned to Ray Crook (387-1941) or myself (387-5795) not later than 1980-08-29. If you wish, please feel free to follow up in writing.

You should be aware that two copies of the draft submission have also been sent by the company to the federal R.S.C.C. (Chairman: Otto Langer) for the same purpose.

You will also note that, at the request of some participants in the Coal Guidelines Review Process, we are, for the first time, including a representative of the Socio-Economic Coordinating Committee and four representatives of the Minesite Advisory Committee in this initial two-week review exercise. For the benefit of those new to this phase of the Coal Guidelines Review Process, I would point out that these draft submissions should be treated as confidential.

Yours truly,

Erik Karlson

Erik Karlson
Chairman (Acting)
Coal Guidelines Steering Committee

EK/RLC:djg

Attachments: see Distribution List

cc: Otto Langer

ASSISTANT DEPUTY MINISTER MINERAL RESOURCES		
REC'D	AUG 22 '80	0643
REFERRED TO	DATE	INITIAL
D.M.		

1980-08-13

DISTRIBUTION

Coal Guidelines Steering Committee

Jake McDonald (all volumes)
John Clancy (all volumes)
Wally Malkinson (all volumes)
Eileen Caner (all volumes)
Gary Harkness (all volumes)
Lance Regan (all volumes)

Minesite Advisory Committee

Murray Galbraith (all volumes)
Hank Howie (Volumes II and III)
Yenon Fellman (Volumes II and III)
Doug Morrison (Volumes II and III - on behalf of regular M.A.C.
representative from F.W.B.)

Socio-Economic Coordinating Committee

Gary Paget (will use Gary Harkness's reports)

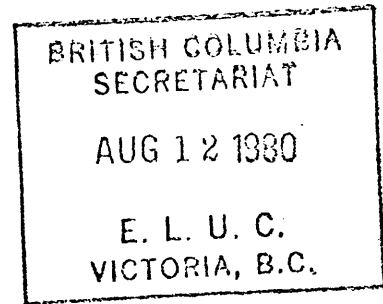
RLC:djg

QUINSAM COAL LTD.

800 ROYAL TRUST TOWER
EDMONTON CENTRE
EDMONTON, ALBERTA
T5J 2Z2

August 11, 1980

Mr. Erik Karlsen
Assistant Director
Environment and Land Use
Committee Secretariat
Province of British Columbia
Parliament Buildings
Victoria, British Columbia
V8V 1X4



Dear Mr. Karlsen:

We are pleased to submit ten (10) copies of the final draft of our Stage II report concerning the development of our proposed Quinsam Coal Mine to be situated 17 miles south-west of Campbell River on Vancouver Island. The report is a detailed assessment of the project consisting of four volumes:

- I - Project Overview
- II - Technical Description
- III - Biophysical Inventory
- IV - Socio-Economic Analysis

The project is summarized as follows:

1) Thermal Coal Mine

Construct and operate the mine, initially as a surface operation, near Middle Quinsam Lake.

2) Clean Coal Transport

Transport clean coal via truck from the mine along a preferred haulage route to a barge loading facility.

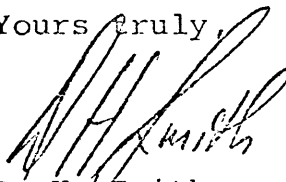
3) Barge Loading Facility

Construct and operate a facility to transfer coal from trucks to barges in the Middle Bay area north of Campbell River.

We understand you will be briefly reviewing the report and advising us if it is acceptable for wider distribution. With your concurrence, we will print and distribute the submission.

We look forward to your early reply.

Yours truly,

A handwritten signature in black ink, appearing to read 'D. H. Smith', written over the typed name below.

D. H. Smith
Manager, Quinsam Project

DHS/TM

cc: Mr. Raymond L. Crook

Enc.

MINISTRY OF ENERGY, MINES AND
PETROLEUM RESOURCES

To: E.R. MACGREGOR

Date: SEPT 11/80

From: J. D. McDONALD.

- For your approval. Prepare reply for my signature.
 For your information. Prepare draft of reply.
 For necessary action. Return to me.
 Send me copy of reply. File.
 For your comments. For signature.

ASSISTANT DEPUTY MINISTER
MINERALS RESOURCES
 Wish to discuss.

REC'D SEP 11 '80

REFERRED TO	DATE	INITIAL
D.M.		
E. & P.		
GEO.		
INSP.		
TITLES		
FILE		

Windsor Coal file

COAL GUIDELINES REVIEW PROCESS

QUINSAM COAL PROJECT

DRAFT STAGE II SUBMISSION, JULY, 1980

RESULTS OF PRELIMINARY REVIEW
(Summary of Telephone Conversations Only)

A. MINISTRY OF ENERGY, MINES AND PETROLEUM RESOURCES

1. Murray Galbraith, Chairman, Minesite Advisory Committee

- Escapement of contaminated water to Quinsam River and Quinsam Lake are the main impacts to be addressed by Section 9 of the Coal Mines Regulation Act (1980).
- Topographic relief of the site is moderate, climate is quite conducive to vegetative growth, and glacial till is plentiful and is a satisfactory growth medium. The proposed drag-line spoiling method lends itself to on-going reclamation and there is a commitment to reduce slopes to 2:1. It is also noted that treated surface run-off will not be conveyed directly into the Quinsam River. All of the above are in the project's favour.
- Concerns exist with respect to the feasibility of achieving the goals of revegetation and the minimizing of silty runoff. These should be addressed in the reclamation submission.
- Specific questions to be addressed regarding the proposed Environment/Reclamation Section include the following:
 - What types of personnel will staff the section?
 - What specialized equipment and nursery facilities are proposed? What is the use schedule?
 - Will the section answer administratively to engineering staff or mine management? (Since control of acid drainage is complex, the latter is recommended).

Recommendation - that the above questions be documented in the Stage II submission.

2. John Clancy, Economics and Planning Division

- A separate confidential submission will be needed which contains data on mine economics.

Recommendation - that the draft Stage II submission be circulated for wider provincial review.

B. MINISTRY OF LABOUR

1. Johann Schuyff, Research and Planning Branch

- Details are lacking on certain aspects of training, including the

following:

- Specifics on apprenticeship training
 - Numbers to be trained in each job category
 - Special local recruitment measures
 - Special problems related to skill shortages
- How does the company define "local" and "regional", terms which occasionally appear to be used interchangeably?
- Calculation of regional income appears to be incomplete and some totals may not add up.
- The general description of the labour market situation is rather vague, especially regarding manufacturing and processing.

Recommendation - that the draft Stage II submission be circulated for wider provincial review.

C. MINISTRY OF MUNICIPAL AFFAIRS

1. Gary Paget, Planning Services and S.E.C.C. Representative

Recommendation - that the draft Stage II submission be circulated for wider provincial review.

D. MINISTRY OF INDUSTRY AND SMALL BUSINESS DEVELOPMENT

1. Nick Poushinsky, Economic Analysis and Research Bureau

- The report is basically incomplete without full discussion of the Middle Bay port option.
- Clearer indications on how citizens will be involved in reviewing the submission would be helpful.

Recommendation - that the draft Stage II submission be discussed at a C.G.S.C. meeting before a final decision is taken on whether or not to circulate it.

2. Brian Parrott, Economic Analysis and Research Bureau

- Revenues accruing to the municipality appear to be overestimated.
- More details on service costs are required.

Recommendation - that the draft Stage II submission be circulated for wider provincial review.

E. MINISTRY OF ENVIRONMENT

1. Hank Howie, Waste Management Branch

- Pollution Control applications have not been discussed in great detail with the company, making it difficult to come to firm

conclusions about the report.

- Will coal dust contamination problems for Crown Z. Pulp and Paper Co. be worse with the port at Middle Point rather than at Tyee Spit?
- The discussion of Tyee Spit dominates many sections of Volume III. This is very misleading to the casual reader, who may miss the introductory statement that the option has been dropped.
- It is implicit in places that design solutions for Tyee Spit are directly transferrable to Middle Point, but this cannot yet be supported by firm documentation.
- Regarding the coal dusting tests, there is some doubt about the comparability of undried Quinsam coal with thermally dried Neptune coal.
- Waste Management Branch comments on the Site Services report are not all reflected in the report.

Recommendation - that some modification of the submission be undertaken before wider provincial circulation. //

2. Yenon Fellman, Water Management Branch

- The Quinsam River is fully committed, but the company appears to be suggesting that it is not.
- The reclamation plan does not address restoration of natural drainage (e.g. drainage ditches that lead to pipelines on steep hillsides need special consideration).
- Regulation of the B.C. Hydro dam on Upper Quinsam Lake - Wokas Lake would not reduce the severity of low flows.
- A runoff factor of 0.5 is too low; 0.8 is recommended, since near-saturation could precede storms.
- Domestic water demand per person at the minesite would be closer to 140 IGPD than to 40 IGPD (the factor used in the submission).
- Table 15 and analyses that follow attempt to show that the effect of the total water demand by the project is never more than 4% of minimum flow. What is not taken into account is that every month for 12 hours, a process demand of 300 IGPM is required. There is a recorded flow of Quinsam River of 5 c.f.s. or 0.14 m³/s below lower Quinsam Lake. The report mentions a minimum of 0.29 m³/s. Taking demand as 300 IGPM, process water and domestic of 300 X140 IGPD/Capita makes 0.025 m³/s. This is 18% of recorded minimum flow.

Recommendation - that these points be rectified before the submission is circulated for general provincial review. //

3. Larry Pommen, Assessment and Planning Division

- The evaluation of the impacts of explosives use on NH_3 , NO_2 and NO_3 levels in natural drainages is not adequate.
- In other respects, water quality topics are addressed, although a detailed review is needed to determine whether or not the treatment of these topics is adequate.
- The water management plan is inadequately described, and will likely need considerable fine-tuning at Stage III.

Recommendation - that the draft Stage II submission be circulated for wider provincial review.

4. Don Reksten, Hydrology Division

Recommendation - that the draft Stage II submission be circulated for wider provincial review.

5. Gordon LeBreton, Groundwater Division

- All topics are addressed, but it does not appear that supporting quantitative data are adequate to support assessments in all instances.
- One cannot be sure that there would be no acid drainage via groundwater.

Recommendation - that the draft Stage II submission be circulated for wider provincial review.

6. Lloyd Erickson, Fish and Wildlife Branch

- The report does not satisfactorily cover many of the issues raised in Doug Morrison's 1980-04-17 letter.
- In general, methodologies are not presented, and rationales are not offered for selection of some of the existing monitoring sites.
- The composition of suspended solids (coal, flocculates, inerts, etc.) is not indicated for settling ponds; this and other doubts exist regarding the discharge of process water.
- Although aquiferous materials are known to exist at the minesite, the report claims that backfilling with impervious fill will prevent acid leachates from reaching natural drainages. This claim requires better documentation.
- The proposed monitoring of settling pond effluent and treated water from pits should be presented in detail.
- The present baseline information on anadromous and resident fish populations and habitats is incomplete and contains errors e.g.

under lake habitats, there is no discussion of non-emergent aquatic macrophytes.

- The report does not indicate whether low flows in the Quinsam River are controlled primarily by natural conditions or B.C. Hydro.
- The impact of snow on mining operations is not discussed.
- Volume III is too heavily dominated by Tyee Spit. Many port design considerations are not directly transferable to Middle Point.

Recommendation - that the draft Stage II submission be substantially revised before wider provincial review.

F. E.L.U.C. SECRETARIAT

1. Ray Crook, Secretary, C.G.S.C.

- The C.G.S.C. must decide whether or not it is acceptable to circulate the submission without details for the Middle Point port. If circulation is agreed, how will the port impact assessment be solicited and reviewed?
- The current draft is dominated by discussions of Tyee Spit at some points. This will undoubtedly cause confusion in the minds of the public.
- The C.G.S.C. should warn the company that to circulate the submission could aggravate public opinion unless it contains, in addition to its present contents:
 - concrete details on baseline monitoring programs for air quality, water quality and fish (new chapter?)
 - detailed Stage II study proposals for the Middle Bay port (new chapter?)The fact that Middle Bay is not written up is likely to cause problems in any event.
- The applicability of port design solutions at Tyee Spit to Middle Point is largely unknown but appears to be tacitly assumed in places.
- Middle Point is closer to the pulp and paper mill than was Tyee Spit. What significance does this have for coal dust contamination?
- More details of the Stage III heritage assessment program will likely be sought by the Heritage Conservation Branch.
- The organization of water-related materials in Volume III is very confusing. It is difficult to locate topics of particular interest.
- Detailed comments include the following:
 - Does road relocation and widening involve ALR land?
 - Does clearing activity affect AAC levels on provincial forest lands?
 - Coastal recreation issues are not mentioned in Volume I.

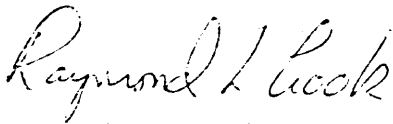
- The Community Planning Sections of the submission should point out that Middle Bay is zoned industrial, and that port development would be consistent.
- Finally, to some extent, provincial reviewers, having seen background reports, may be more satisfied than the public in cases where detail is not presented.

Recommendation - the company should be advised that, unless a variety of changes and additions are made, the report will be deemed incomplete by many provincial reviewers.

- The company should be advised that public reaction could be adverse unless additional information is provided, e.g. on monitoring and port planning.

- The fact that Middle Bay port has not been assessed is not in itself sufficient grounds to reject the submission from a provincial standpoint, but details of port planning studies are needed.

Compiled on the basis of telephone conversations by:



Raymond L. Crook
Secretary
Coal Guidelines Steering Committee
1980-09-05

RLC:plj