

Comments on Draft Water License N3L8-1838

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- Site location and dates are correct.
- Purpose currently states “waste disposal” — note that we will be discharging intercepted, cleaned groundwater and surface water, for the purpose of recharging the water table. This is not truly a waste.

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- Paragraph C-2 — Oil and grease is an outdated analysis and redundant when testing for total petroleum hydrocarbons. Benzo[a]pyrene is not water soluble. Delete both of these analytes from the table of parameters.
- Paragraph C-3 — add sheen.
- Paragraph C-8 appears to preclude other onsite remediation methods, in the event that biotreatment is ineffective. Instead of “shipped by the Licensee to a licenced disposal facility” state “remediated in another manner acceptable to the Board.”

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- Paragraph D-5 — In the interest of focusing response efforts, we would prefer to telephone only one number in the event of a spill.

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- Paragraph F-1 requires construction to be supervised by an engineer. Matrix will have two non-engineers onsite for construction (a senior engineering technologist with northern, remediation experience and construction safety certification; and an experienced water remediation system specialist), who will be in daily communication with our offsite NAPEG-registered engineer.
- Paragraph F-4 requires a MSDS for the Bio-Reclaim inoculant. Bio-Reclaim is a proprietary, non-hazardous mixture. According to the federal *Hazardous Products Regulations* suppliers are not required to provide MSDS for non-hazardous products.

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- Paragraph B-1 — Remove oil and grease and benzo[a]pyrene from the table of parameters, consistent with Paragraph C-2. Add Total Mercury (Hg) to the list of parameters.