ENVIRONMENTAL PROTECTION NOTICE

Application for a *Permit amendment* Under the Provisions of the *Environmental Management Act*

We/I, Alex Brosseau, Merritt Green Energy GPL, 1234 Mid Day Valley Road, Merritt, BC, V1K 0A3, intend to submit this amendment application to the Director to amend Permit 105784, issued December 15, 2011 and last amended August 1, 2013 which authorizes the discharge of air emissions from a Biomass to Energy Facility.

The land upon which the facility is situated and the discharge occurs is Lot 1 District Lots 166 and 172, Kamloops Division Yale District Plan EPP18397, located at/on/near 1234 Mid Day Valley Road, Merritt, BC, VIK 0A3, within the municipality of Merritt, BC.

The amendment application requests that the following conditions be changed as outlined below:

- 1. Remove authorization for emissions from pneumatic conveyance of flyash. The original design for pneumatic conveyance was replaced by an auger conveyor to transport ash to the ash storage silo with minimal dust generation. The silo is equipped with a dust filtre system to reduce airborne ash and thereby prevent explosions inside the silo. Given the low flow of the unit and the low concentration of particulate from filter systems, MGE requests that this item be listed as a Miscellaneous Source.
- 2. Allow for changes in emissions during boiler start up, shutdown and emergency shutdowns. During these periods particulate concentrations are higher while rates of flow are decreased. In order to allow for these occurrences, MGE requests that existing permit limits are not changed but applied in terms of kg/24 hr for the day of the event. With the particulate limit of 20mg/m³ and the maximum flow of 66m³/sec, the limit of 114 kg/day would apply.
- 3. Addition of construction and demolition waste, in conformance with fuel specifications, to the currently authorized fuels (untreated wood residues, low sulphur fuel oil, propane, and natural gas). This is a well-established fuel for green energy plants and is needed to replace hogfuel supply lost due to sawmill closures and curtailments.
- 4. Removal of sections that refer to the original plant commissioning.
- 5. Addition of the provision for stack testing, and reporting results, twice yearly upon two consecutive quarterly stack tests meeting all requirements. This is consistent with other Air Permits in BC and with the BC Ministry of Environment Guideline for Emissions from Biomass-Fired Boilers. The current requirement is for stack testing four times per year.
- 6. Clarification that participation in the Merritt Air Shed Monitoring Program is required only when that Program is active.
- 7. Removal, from the list of items required in the Annual Report of 1) an executive summary of the report for submission to the Interior Health Authority and the City of Merritt and 2) an updated Emergency Response Manual. A full copy of the Annual Report should be submitted to both agencies to avoid the risk of omission. The Emergency Response Plan contains private contact information and is intended for internal use.

Any person who may be adversely affected by the proposed amendment and wishes to provide relevant information may, within 30 days after the last date of posting, publishing, service or display, send written comments to the applicant, with a copy to the Regional Director, Environmental Protection at *Authorizations.South@gov.bc.ca*. Subject line to show "Application No. 385545". The identity of any respondents and the contents of anything submitted in relation to this application will become part of the public record.

Dated this 25th day of June, 2020.

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