

Good Day Ms. Kathy Preston, Esteemed Government & Public Officials and Responsible Individuals serving our community,

I wish to draw your urgent attention to my request that you do not approve the Air Quality Permit application submitted to Metro Vancouver by Semiahmoo RNG GP Corp. (GVA1202) on the following grounds:

- 1) The application documents contain many inconsistencies, irregularities and incomplete information.
- 2) If Metro Vancouver relies on the information submitted by Semiahmoo RNG GP Corp. in its Air Quality Permit application documents, and approves such application based on the assumed merits of the information it contains, it may be doing so at the risk of causing undisputable and irreparable harm to both the environment and human health.

Metro Vancouver has serious obligations under the “Provincial Environmental Management Act, S.B.C 2003, c.53” and the “Greater Vancouver Regional District Air Quality Management Bylaw No. 1082, 2008” to ensure that the environment and the health and safety of persons are protected from adverse impacts. The documents relating to the British Columbia Laws and the Greater Vancouver Regional District Laws and Regulations, along with the publicly available documents provided to Metro Vancouver by Semiahmoo RNG GP Corp. in support of their requested Air Quality Permit that have been referenced in this communication are listed below:

https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/03053_00

<https://metrovancover.org/services/air-quality-climate-action/Documents/air-quality-permitting-process-legal-framework.pdf>

https://metrovancover.org/boards/Bylaws/MVRD_Bylaw_1082_Consolidated.pdf

<https://metrovancover.org/services/air-quality-climate-action/Documents/semiahmoo-rng-aq-permit-application-redacted.pdf>

<https://metrovancover.org/services/environmental-regulation-enforcement/air-quality-regulatory-program/PermitApplicationDocuments/2023-08-29%20-%20FINAL%20-%20Air%20Quality%20Environmental%20Protection%20Notice%20-%20Semiahmoo%20RNG%20GP%20Corp%20-%201202.pdf>

<https://metrovancover.org/services/air-quality-climate-action/Documents/air-permit-application-guide.pdf>

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Please note the following inconsistencies, irregularities and incomplete information, and please provide answers to the below questions:

- 1) The Environmental Protection Notice published by Semiahmoo RNG GP Corp. references “Andion” as an alternate corporate name. For example, the document states that “Semiahmoo RNG GP Corp. (“Andion”) is an organic material resource recovery facility”.

Can you please confirm the business and/or legal relationship between Semiahmoo RNG GP Corp. and “Andion” in relation to the permit application, and provide proof regarding which legal Andion entity was being referenced at the accepted date of the application?

- 2) The Air Quality permit application documents submitted to Metro Vancouver by Semiahmoo RNG GP Corp. references “Andion North America Ltd.” as the “Technical Contact”, which has recently undergone a name change and restructuring to Taurus Canada RNG Corp.

Can you please confirm the business and/or legal relationship between Semiahmoo RNG GP Corp. and Taurus Canada RNG Corp. in relation to the permit application and as confirmed at the accepted date of the application?

- 3) As per Metro Vancouver Guidance for Air Permit Applications, under the “General Instructions for Submitting an Application”, the Declaration must be signed by an Officer of the Company. Officers of Semiahmoo RNG GP Corp. include Philip Arbrary and Eric Streeter. The Semiahmoo RNG GP Corp. Air Permit application has been signed by Daniele Chiodini, who is neither a disclosed Officer of the Applicant nor the Agent.

Can you please advise as to why the application and declaration was accepted by Metro Vancouver as being complete and compliant, which it clearly was not?

4) A qualified professional has not assisted with the technical portions of the application.

Can you please advise why this application was accepted and is being processed given that it has not been prepared by a Qualified Professional, especially given the fact that this proposed Facility would be relying on technology and equipment that is potentially unproven in this application and in North America and situated so close to sensitive receptors?

5) Under A.8, “How near are sensitive receptors”, the name and address of the nearest residence within the Semiahmoo First Nations Reserve, and its distance from the legal facility property line has not been provided. The Hills at Portal Golf Course is less than 250 metres away, the Peace Arch Duty Free retail business is located a mere 270 metres away, and the Canada Border Services buildings (which are permanently occupied and have employees stationed outside) is within 400m from the Biofilter. In addition, this section fails to recognize the Little Campbell River habitats, upon which this proposed Facility would be built.

Can you please advise if you are considering other “sensitive receptors” that are not disclosed within the application, and if so, how they will be protected from damage and harm? If not, can you please explain why not, and can you also confirm why the application was accepted based on an unverified and incorrect declaration from an unqualified person?

6) As per section A.9, has Metro Vancouver received the legal land title from Natural Resources Canada?

7) As per Metro Vancouver Guidance for Air Permit Applications, under the “General Instructions for Submitting an Application”, numerical values must be reported to three or fewer figures with a maximum of two decimal points.

In section MVAQ-D1, there are several formulas containing scientific notations such as “6.00E-03”, can the actual numbers be confirmed?

8) Section MVAQ-D1a references an “existing permit”, specifically pages 14-22.

Can you please advise why this application is referencing an existing permit? If this was a mistake in the application, please explain why it was accepted for processing. Can Metro Vancouver also confirm if they are aware of any other permits required and applied for in connection with this project and their status?

9) Section MVAQ-D1a further references that there is potential for odour beyond the facility property line from the “reception/pre-treatment building exhaust, bio pulper, equalization tank headspace discharging through a biofilter”. It also states that there is no odour management plan attached to the application, with no corresponding explanation.

Why is there no odour management plan included in this application, and why would Metro Vancouver accept an application that does not include an odour management plan, especially when the Semiahmoo Renewable Natural Gas Facility Air Quality Dispersion Modelling Rev.1 as provided by Tetra Tech noted that regular and significant odour nuisance would occur outside of the proposed facility boundaries and especially during start up periods or periods of plant malfunctions?

10) The Application Completeness Checklist on pages 49-50 has not been completed.

Can you advise if it is standard practice for Metro Vancouver to accept Air Quality permit applications with incomplete information?

11) In Section 1.1 of the “Semiahmoo RNG Facility Air Permit Application – Process Description and Schematic Flow Diagram”, it states that “the technology offered by Andion is unique with regards to the comprehensive approach and, most importantly, to the unique solution for treating difficult substrates such as food waste, organic waste, commercial waste, farm waste and slaughterhouse waste.” Conversely, on page 16 of the Semiahmoo RNG GP Corp. application documents, under Section MVAQ-D1a, it declares that the source of the emissions will be 125,000 tonnes of “food waste” per year. Scientific evidence confirms that the emissions generated by anaerobic digestion of farm waste, animal manure, and slaughterhouse waste are very different from those emissions generated by the anaerobic digestion of food waste.

<https://www.sciencedirect.com/topics/earth-and-planetary-sciences/slaughterhouse-waste#:~:text=In%20addition%2C%20slaughterhouse%20waste%20often,which%20contributes%20to%20climate%20change>
<https://hb.diva-portal.org/smash/get/diva2:858448/FULLTEXT01.pdf>

Can you confirm if farm waste, animal manure and slaughterhouse waste will be utilized as potential sources of feedstock at this proposed Facility? If the answer is no, can you further confirm that if an Air Quality Permit is issued for the proposed Facility by Metro Vancouver, that such a permit would deny any use of feedstock that consists of farm waste, animal manure and/or slaughterhouse waste? Conversely, if the answer is “yes” can Metro Vancouver please confirm that they have considered and calculated the effects of such a significant change to the feedstock in relation to the hypothesised emissions for the project and provide an example of these calculations and the adjusted air dispersion concentrations maps?

12) On page 16 of the Semiahmoo RNG GP Corp. application documents, under section MVAQ-D1a, it declares that the source of the emissions will be 125,000 tonnes of “food waste” per year. Conversely, in Section 2.1 of the “Semiahmoo RNG Facility Air Permit Application – Process Description and Schematic Flow Diagram”, it states that incoming feedstock will include 55,000 metric tonnes annually of waste from “industrial, commercial, and institutional settings”, without divulging the specific type of feedstock.

Can you please confirm what the feedstock sources for this proposed Facility will be, including detailing the sources of the reported 55,000 metric tonnes annually of waste from “industrial, commercial and institutional settings”?

13) On pages 59-67 of the Semiahmoo RNG GP Corp. application documents, under sections 2.1-2.5 of the “Semiahmoo RNG Facility Air Permit Application – Process Description and Schematic Flow Diagram”, there is a significant amount of redacted information pertaining to fugitive emissions, pre-treatment, leachate management, anaerobic digestion, storage and treatment of biogas, biogas upgrading, emergency safety, and wastewater treatment and disposal. This redaction is concerning given that there are no issued patents to Taurus Canada RNG Corp. for any of the equipment or processes, leading to legitimate questions regarding any “proprietary” claims that may be being made by Semiahmoo RNG regarding such equipment and processes.

Given the importance of the information in these pages, especially in relation to potential environmental and human health impacts, can you please advise if Semiahmoo RNG GP Corp. meets all three of the required conditions as per Section 21 (1) of the FOIPPA, and provide the rationale for making such a determination for such a significant portion of information that is relevant to understanding how environmental and human health will be protected from harm?

14) At several places within the Semiahmoo RNG GP Corp. application documents, including pages 74 and 83, it lists the source of the information as “S. Macé, P. Llabrés Barcelona, Spain, 24 January 2000” and “J. Mata-Alvarez, S. Macé, P. Llabrés. 2000. Anaerobic digestion of organic solid wastes”, which appears to be the same document. Please note that if the Semiahmoo RNG GP Corp. based the emissions levels and composition of various pollutants and gases referenced throughout the application on a scientific paper what was written 24 years ago, such emissions estimates may not hold any technical merit currently.

Assuming both of these references are the same source, can you confirm that the technical information contained within these application documents regarding emission levels and compositions of gases and pollutants is being derived from a scientific article that was published in the year 2000? Furthermore, can you advise if there was any other scientific evidence provided by Semiahmoo RNG GP Corp., other than this scientific article from the year 2000, to substantiate the emissions and composition levels of gases and pollutants that are reflected in their application documents?

15) Throughout pages 74-85 of the Semiahmoo RNG GP Corp. application documents, under “Semiahmoo RNG Facility Air Permit Application – Process Description and Schematic Flow Diagram”, there are references to various modelled data including “modelled data from vendor” and from “Andion models”. In addition, on pages 74 and 85 specifically, there are 3 actual estimates provided, 2 from samples taken on two different dates (06/03/2017 and 11/10/2016) from the Mozzate Biogas Facility and 1 from a sample taken from the Alan SRL Zinasco Italy Facility, on an undisclosed date.

Given that almost all of the technical data provided is based on “vendor” and “Andion” modelling, can you please provide further documentation that substantiates the sources of the 3 days of data of real-world examples, including the source date of the data from the Alan SRL Zinasco Facility, the source and composition of feedstock used at these two facilities, and the amount of feedstock processed annually at these two facilities? Could you also please confirm which legal entity “Andion” refers to in this context? As these projects predate the incorporation of any Andion entity, could you also please provide validated documentation authorizing this / these entity(ies) the possession and use of this information, and confirm if these sources of information have been validated for accuracy?

16) Can you please confirm how Metro Vancouver has qualified and quantified that the emissions levels and composition of various pollutants and gases are accurate, especially based on the fact that only 3 days of data as real-world examples were provided by Semiahmoo RNG GP Corp., that may not even be relevant depending on source and quantity of feedstock, and that most of the data is based on projected modelling from either “Andion” itself or from its equipment vendors?

17) Can you please confirm if the Semiahmoo Renewable Natural Gas Facility Air Quality Dispersion Modelling Rev.1 as provided by Tetra Tech was based on inputs that reflected only 3 days of data as real-world examples of emission levels and composition, and whether they were validated as being a true representation of the median output from these facilities and the methodology used for testing and calculating?

18) In reference to the Tetra Tech Air Dispersion Report JUNE 5, 2023 ISSUED FOR USE_REV01 FILE: 704-SWM.PLAN03183-03 report, Section Results, 5.1 Background Air Quality.

Can Metro Vancouver please explain why the readings from the three stations referenced (T15,T27 &T39) can be considered a representative baseline for NO2 and SO2 in the vicinity of this proposal given the specific circumstances of this location, especially reflecting the following already existing sources of considerable localized pollution?:

- proximity to highway 99 and the busy Peace Arch Border crossing with high volumes daily of idling vehicles
- proximity to the rail line, with idling diesel engines and fine particulate pollution caused by coal transport
- proximity to, and prevalent wind direction from, the Cherry Point Refinery in WA
- the livestock and agricultural activities surrounding the community

19) You have stated in many responses to legitimate questions from many concerned persons, that “questions about the proposed project are the responsibility of the Applicant”. If questions about the proposed project are the responsibility of the applicant, why has Semiahmoo RNG GP Corp. not addressed the hundreds of questions that concerned persons have submitted regarding this proposed Facility?

To my knowledge the applicant has yet to answer a single concerned person’s question and I have not received a response to my questions.

20) In the “GVRD Air Quality Permitting Process and Decisions: General Legal Framework and Guiding Principles”, section 3.2 requires that the process “must also be unbiased, impartial” and section 3.3 further states that the process “may not be fettered or directed by others in exercising discretion”. Can you please confirm that this legal framework is being followed?

I specifically request that you acknowledge my status as a “Concerned Person” for the purposes of this Air Quality Permit application, and that I receive answers to the above questions based on health concerns for myself and my family.

I also wish to be kept informed of any changes in the status of this permit application.

Kind Regards,

YourName

YourPostalCode

YourEmail