

Dear Ms. Preston,

Thank you for your recent email response to my questions regarding the Air Quality Permit Application submitted to Metro Vancouver by Semiahmoo RNG GP Corporation (GVA1202).

The Air Quality Management Bylaw 1082, 2008, prohibits the discharge of air contaminants unless authorized by permit or regulation. Under this bylaw, Metro Vancouver is responsible for the regulation of emissions from industrial, commercial and institutional sources. Metro Vancouver has reassured the public that its role is to minimize emissions, thereby improving air quality, and avoiding adverse health impacts and environmental degradation.

The public relies on Metro Vancouver's expertise and knowledge in reviewing Air Quality Permit applications, and assumes that any application and documentation submitted will be thoroughly reviewed for inconsistencies, irregularities, and omissions. Metro Vancouver's acceptance and processing of the Semiahmoo RNG GP Corporation's application and documents, which contain significant inconsistencies, irregularities, and omissions, erodes the public's confidence in this process, casts doubt as to the actual qualifications and experience of the Applicant, and undermines Metro Vancouver's reassurances that its primary role is to improve air quality, to safeguard the health of individuals and communities, and to prevent the further degradation of the environment.

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 Letter are listed below:

[https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/03053\\_00](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/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>

Your recent response fails to address the following key areas of concerns, and I kindly request a further response 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”. 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 “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? 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?***

- 2) You state that “Metro Vancouver staff relied on the fact that Daniele Chiodini was truthfully and accurately declaring that he is an officer of the applicant company or authorized to sign on behalf of that company”.

***Can you please advise if you have confirmed if Daniele Chiodini is indeed an officer of the Applicant’s company, and if not, can you confirm that he is an Authorized Agent?***

- 3) You state that “it is recommended that an applicant “consider” using a qualified professional; this is not a requirement. The qualified professional can be staff of the applicant company. Metro Vancouver staff reviewing the drafts of the application had no reason to doubt the technical competency of their primary contacts at the applicant company.”

***Can you advise if you have reviewed the information available at the following link?***  
<https://www.thecleanairalliance.org/news-andion-abrary-martin-lof.html>

- 4) You state that “If an air permit is issued, it is unlikely to authorize specific feedstock mixtures, although it may specify general types.”

***Given this, can you confirm that the Semiahmoo Renewable Natural Gas Facility Air Quality Dispersion Modelling Rev.1 as provided by Tetra Tech considered and calculated the effects of the potential use of all feedstock sources including slaughterhouse waste, farm waste, and animal manure, in relation to the hypothesised emissions for the project? This is especially important given that 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>  
<https://hb.diva-portal.org/smash/get/diva2:858448/FULLTEXT01.pdf>

- 5) You state that “There is also clear indication that Andion provided the document in confidence and with the expectation that it remain confidential. When it comes to anticipated harms, these process and design descriptions effectively provide the whole process model under which Andion operates its facilities. If disclosed, a competitor would probably be able to glean operational or process efficiencies that Andion has developed, thus harming Andion’s competitive advantage. With the process and design descriptions, other third parties would also be able to copy the process model that Andion has developed and potentially enter the market with an undue advantage.”

***Given the multiple references in your response to “Andion”, can you confirm whether “Andion” will continue to be the company providing the technical know-how, proprietary systems and processes, development expertise, and operational guidance to the Semiahmoo RNG GP Corp.? This is especially confusing and concerning given “Andion’s” recent “exit” from the North American market.***

- 6) 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 Anaerobic digestion of organic solid wastes”.

***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?***

- 7) 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?***

***8) 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?***

***9) 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?***

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, my family, my community and the environment.

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