bulkley valley - lakes district airshed management society

Chapter 5: Other Regulated Industrial Sources 2009 Addendum

Chapter 5 of the BVLD Clean Air Plan deals with the other regulated sources in the airshed, which included Northern Engineered Wood Products Inc. (NEWPRO) and LB Paving at the time the Plan was written.

Since the Plan was written in 2004, other regulated emission sources have emerged in the BVLD airshed. An energy system was installed at the Pacific Inland Resources (West Fraser Mills) sawmill in Smithers and a Pellet Plant was built at Canfor in Houston. Both of these facilities were new emission sources in the airshed, however, because they replaced beehive burners, they resulted in a net reduction in PM emissions from those mills.

In 2009 the Ministry of Environment received a permit application for another Pellet Plant in Burns Lake, and it is currently working through the permitting process on this project. Across the province, market conditions, fibre supply, and pressure to reduce unnecessary burning of woody debris are resulting in an increasing number of pellet plant facilities. The AMS and MOE believe that this trend will continue in the BVLD airshed. In addition, provincial and industrial efforts to pursue biomass energy production may result in the addition of other emission sources from bioenergy facilities in the future.

In September 2009 the AMS released a report titled: Hwy 16 Woody Debris Inventory. This report estimates the total volume of woody debris generated annually along the highway 16 corridor, and is meant to answer some key questions such as: how much woody debris is available and where; what kind is available and; to what ends could it be used. Pellet plants and bioenergy facilities are examples of industries which will benefit from this report. Examples of smaller markets that could benefit from the report include local government for landscaping and landfill cover, garden centres that sell mulch, and agricultural operations needing clean animal bedding.

There are a few proposed mining projects in the BVLD Airshed which would also result in increased emissions should they move forward to development. These include the Davidson Project (near Smithers), Dome Mountain Project (near Smithers) and the Morrison Project (near Granisle). In addition, there are a number of other exploration projects within the airshed boundary which could turn into proposed mines in the future. In 2008 the AMS submitted formal comments to the Environmental Assessment Office on the Davidson Project, encouraging Blue Pearl Mining Company to develop a comprehensive strategy for reducing transportation emissions and employ best management practices to reduce emissions during poor air quality periods. As well, Davidson Project representatives were encouraged to keep open lines of communication with the BVLD AMS.

The Clean Air Plan focuses on goals, indicators and strategies for NEWPRO since the plant manager was a major participant in the planning process. Table 5.1 (below) describes the strategies that were implemented over the past five years, and Table 5.2 reports back on the three indicators listed in the *Section 5-5* of the Plan.

Table 5.1: Update of Strategies Implemented 2004-2008

Goals	Strategies
1. Reduce number of days when industry emissions affect local air quality & prevent dryer emission test failures	**Review annual stack testing reports and meet to discuss.** Annual stack testing reports are received and reviewed by Ministry of Environment staff. To date, the AMS has not participated in reviews and/or meetings related to these reports. **Complete 1st phase of emissions characterization program.** In early 2007 MOE hired an engineering consulting company to prepare an Emission Characterization Report for the NEWPRO facility in Smithers. The goal of the project was to help MOE better understand air contaminant emission mechanisms and control technologies at NEWPRO in particular, and panelboard plants in general, so that it can appropriately regulate and permit the NEWPRO operation. The report concluded that NEWPRO's overall air emissions and degree of control are comparable to or better than similar particleboard plants in North America. **Improve processor to sharpen image on the web from webcam.** This task was not completed **Create and implement voluntary outside dryer shutdown plan.** NEWPRO has a voluntary dryer shutdown plan in place. In its 5-year Continuous Improvement Plan dated June 2009, NEWPRO indicates that its primary goal will be to "focus all efforts on stockpiling dried material to allow full compliance with the voluntary dryer shutdown plan during episodes of poor air quality in the future". In addition to implementing the Voluntary Outside Dryer Shutdown Plan, NEWPRO's 2009 5-Year Continuous Improvement Plan also indicates that the company intends to pursue other management strategies including: explore avenues to reduce dryer operating temperatures (to reduce PM discharge and visible blue haze); explore avenues to reduce fugitive dust escape (at fibre feed-in points and outside storage areas); and educate supervisory staff on management strategies and goals described in the Continuous Improvement Plan. The Continuous Improvement Plan also identifies some equipment/process improvements, which are not expected to be implemented until the global (and local) economic situation improves. **Conduct community education on emissions.** A Draft NEWPRO factsheet brochure was developed but never finalized or published.

Table 5.2: Indicator Results

<table>
<tr><th>Goals</th><th>Indicators</th></tr>
<tr><td>1. Reduce number of days when industry emissions affect local air quality</td><td>Emission characterization program progress.

As mentioned above, an Emission Characterization Report for the NEWPRO facility was completed in 2007. The next stage of work was the creation of a Continuous Improvement Plan for PM emissions from this facility, which was just recently submitted to MOE.

Number of voluntary outside dryer shutdown days.

NEWPRO has kept records of shutdown days for 2007, 2008 and 2009. These days may correspond with poor air quality days, or they may be due to other reasons. The data is presented below, however, since it does not necessarily represent voluntary shutdown days related to air quality, its usefulness as an indicator is questionable. An alternate indicator that is easy to measure, and meaningful from an air quality perspective, is recommended.

<table>
<tr><th>Year</th><th>Shutdown Days</th></tr>
<tr><td>2007</td><td>132</td></tr>
<tr><td>2008</td><td>81</td></tr>
<tr><td>2009 (to November)</td><td>40</td></tr>
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<tr><td>2. Prevent dryer emission test failures</td><td>Annual test results.

Emission test reports for 2004-2008 submitted to the Ministry of Environment indicate that both permitted emission sources at NEWPRO were in compliance with permit limits each year.</td></tr>
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Future Direction:

In cooperation with NEWPRO, the AMS should define a better indicator for this operation, and ensure that appropriate data is being collected so that reporting is possible. As well, the AMS commits to engaging NEWPRO in any future airshed planning process.

As the number of pellet plants in the BVLD airshed increases, it will become increasingly important to ensure that this emission source does not compromise air quality, or cause poor air quality through the cumulative effects of its emissions combined with the other existing emissions in the airshed. The Ministry of Environment has committed to developing best achievable emission technology standards for pellet plant dryer emissions and the AMS intends to promote processes and projects which aim to minimize emissions and efficiently use waste products including woody debris. Specific goals and strategies to manage emissions from pellet plants should be developed and implemented and the AMS should engage the companies in AMS activities.

If any of the proposed mining projects complete the Environmental Assessment Process and move into development and permitting, goals and strategies for this source should also be identified and the companies should be encouraged to participate in AMS activities.

Finally, where appropriate in the OCP process, the AMS commits to submitting comments related to zoning or rezoning land for industrial development.