



Report Date: May 30, 2022

File: 13444

Report Number: 188301

West Fraser Mills Ltd. dba Westpine MDF
300 Carradice Road Quesnel
BC V2J 5Z7

Dear West Fraser Mills Ltd. dba Westpine MDF,

Re: Notice Letter, Permit 13444, WestPine MDF Plant, Quesnel, BC, Air

On May 18, 2022, BC Ministry of Environment and Climate Change Strategy (Ministry) Environmental Protection Officer Rafiullah Sahibzada (Officer Sahibzada) conducted an on-site inspection of the West Fraser Mills Ltd. dba WestPine MDF (Permittee) medium density fibreboard facility (Facility), located in Quesnel, BC, to verify compliance with permit number 13444 (Permit) under the *Environmental Management Act*. The Permit authorizes the Permittee to discharge contaminants to air from a medium density fibreboard facility. The Permit was issued February 13, 1995, and was last amended March 25, 2021. Janice Schutz, Environmental Coordinator and Gary Perry, Production Superintendent, WestPine MDF, accompanied Officer Sahibzada during the on-site inspection and provided requested information.

This Notice letter has been issued because this inspection determined that you are in compliance with the terms and conditions of your authorization for the noted inspection period. Please refer to the inspection details table below for a list of the specific regulatory requirements that were assessed.

Inspection Details:

This inspection assessed compliance for the period from April 1, 2021, to May 31, 2022, (Inspection Period) and included a review of the following documents:

- Information Request, dated May 19 & 25, 2022, reply by Janice Schutz, Environmental Coordinator, WestPine MDF (Email)
- Q2 Air Quality Data Report, dated July 15, 2021, prepared by Janice Schutz, Environmental Coordinator, WestPine MDF (2021 Report)
- Section 2.3 Authorized Works Records, dated May 25, 2022, prepared by WestPine MDF (Works Records)
- Section 2.4 Ash Disposal Records, dated May 25, 2022, prepared by WestPine MDF (Ash Records)
- Section 2.5 Fugitive Dust Management Plan, dated May 25, 2022, prepared by WestPine MDF (FDMP)
- Section 2.7 Hog Pile Disposals, dated May 25, 2022, prepared by WestPine MDF (Hog Records)
- Section 2.8 Baghouse Maintenance Records, dated May 25, 2022, prepared by WestPine MDF (Maintenance Records)
- Section 3.8 QA/QC Program, dated May 25, 2022, prepared by WestPine MDF (QA/QC Program)

Below are the Permit clauses that were assessed for compliance during this inspection, as well as the associated details/findings and any actions required.

Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.1, 1.1.1</p> <p>1.1.1: This section applies to the discharge of air contaminants from TWO DRYER CYCLONES (Drawing 1) treating emissions from one fibre dryer. The EMS site reference numbers for these discharges are South Face (SF) E224607 and North Face (NF) E224606.</p> <p>1.1.1 The maximum combined authorized rate of discharge from two dryer cyclone stacks is 72.5 m³/s.</p>
Details/Findings:	The 2021 Report confirmed that the maximum combined authorized rate of discharge from two dryer cyclone stacks was 57.4 m ³ /s.
Compliance:	In
Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.1, 1.1.3</p> <p>1.1.3: This section applies to the discharge of air contaminants from TWO DRYER CYCLONES (Drawing 1) treating emissions from one fibre dryer. The EMS site reference numbers for these discharges are South Face (SF) E224607 and North Face (NF) E224606.</p> <p>1.1.3 The characteristics of the discharge from the two face dryer cyclones stacks must not exceed a weighted average* discharge concentration of: Total Particulate Matter 30 mg/m³ Formaldehyde (when in use) 52 mg/m³</p> <p>* weighted average concentration = (FLOW_{SF} x CONCENTRATION_{SF} + FLOW_{NF} x CONCENTRATION_{NF}) / (FLOW_{SF} + FLOW_{NF})</p>
Details/Findings:	<p>The 2021 Report confirmed that the characteristics of the discharge from the two face dryer cyclones stacks did not exceed a weighted average discharge as below:</p> <p>Total Particulate Matter: Weighted Average Discharge Concentration 16.4 mg/m³ (North Face = 10.7 mg/m³ and South Face = 22.0 mg/m³)</p> <p>Formaldehyde measurement is required whenever urea formaldehyde resins are in use in the manufacturing process as per section 3.1 of the Permit. The Permittee informed Officer Sahibzada that formaldehyde resins were not used during the Inspection Period.</p>
Compliance:	In

Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.1, 1.1.4</p> <p>1.1.4: This section applies to the discharge of air contaminants from TWO DRYER CYCLONES treating emissions from one fibre dryer. The EMS site reference numbers for these discharges are South Face (SF) E224607 and North Face (NF) E224606.</p> <p>1.1.4 The authorized works are resin injection systems, one indirect heated single stage flash tube dryer, fans, two high efficiency cyclones, ducts, and related appurtenances approximately located as 04 and 05 on Site Plan A.</p>
Details/Findings:	During the on-site inspection, Officer Sahibzada observed and confirmed the presence of the authorized works as described in this section.
Compliance:	In
Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.2, 1.2.1</p> <p>1.2.1: This section applies to the discharge of air contaminants from TWO CORE DRYER CYCLONES (Drawing 1) treating emissions from one fibre dryer. The EMS site reference numbers for these discharges are South Core (SC) E221929 and North Core (NC) E224605.</p> <p>1.2.1 The maximum combined authorized rate of discharge from the two dryer cyclone stacks is 72.5 m³/s</p>
Details/Findings:	The 2021 Report confirmed that the maximum combined authorized rate of discharge from two core dryer cyclone stacks was 62.1 m ³ /s.
Compliance:	In

Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.2, 1.2.3</p> <p>1.2.3: This section applies to the discharge of air contaminants from TWO CORE DRYER CYCLONES (Drawing 1) treating emissions from one fibre dryer. The EMS site reference numbers for these discharges are South Core (SC) E221929 and North Core (NC) E224605.</p> <p>1.2.3 The characteristics of the discharge from the two face dryer cyclones stacks must not exceed a weighted average* discharge concentration of: Total Particulate Matter 30 mg/m³ Formaldehyde (when in use) 52 mg/m³</p> <p>* weighted average concentration = (FLOWSC x CONCENTRATIONSC + FLOWNC x CONCENTRATIONNC) (FLOWSC + FLOWNC)</p>
Details/Findings:	<p>The 2021 Report confirmed that the characteristics of the discharge from the two core dryer cyclone stacks did not exceed a weighted average discharge as below:</p> <p>Total Particulate Matter: Weighted Average Discharge Concentration 11.0 mg/m³ (North Core = 11.6 mg/m³ and South Core = 10.4 mg/m³)</p> <p>Formaldehyde measurement is required whenever urea formaldehyde resins are in use in the manufacturing process as per section 3.1 of the Permit. The Permittee informed Officer Sahibzada that formaldehyde resins were not used during the Inspection Period.</p>
Compliance:	In
Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.2, 1.2.4</p> <p>1.2.4: This section applies to the discharge of air contaminants from TWO CORE DRYER CYCLONES (Drawing 1) treating emissions from one fibre dryer. The EMS site reference numbers for these discharges are South Core (SC) E221929 and North Core (NC) E224605.</p> <p>1.2.4 The authorized works are resin injection systems, one indirect heated, single stage, flash tube dryer, two high efficiency cyclones, fans, ducts, and related appurtenances approximately located as 06 and 07 on Site Plan A.</p>
Details/Findings:	During the on-site inspection, Officer Sahibzada observed and confirmed the presence of the authorized works as described in this section.
Compliance:	In

Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.3, 1.3.1</p> <p>1.3.1: This section applies to the discharge of air contaminants from ONE DRY ELECTROSTATIC PRECIPITATOR treating emissions from one energy system. The EMS site reference number for this discharge is E221930.</p> <p>1.3.1 The maximum authorized rate of discharge is 28 m³/s.</p>
Details/Findings:	The 2021 report confirmed that the maximum discharge rate from one dry electrostatic precipitator was 23.5 m ³ /s.
Compliance:	In
Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.3, 1.3.3</p> <p>1.3.3: This section applies to the discharge of air contaminants from ONE DRY ELECTROSTATIC PRECIPITATOR treating emissions from one energy system. The EMS site reference number for this discharge is E221930.</p> <p>1.3.3 The characteristics of the discharge must not exceed: Total Particulate Matter: 55 mg/m³ corrected to a flue gas oxygen content of 8% by volume</p>
Details/Findings:	<p>The 2021 Report confirmed that the characteristics of the discharge was:</p> <p>Total particulate matter: 19.4 mg/m³ corrected to a flue gas oxygen content of 8% by volume.</p>
Compliance:	In
Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.3, 1.3.4</p> <p>1.3.4: This section applies to the discharge of air contaminants from ONE DRY ELECTROSTATIC PRECIPITATOR treating emissions from one energy system. The EMS site reference number for this discharge is E221930.</p> <p>1.3.4 The authorized works are a four cell, wood residue and natural gas fired energy system, a closed loop thermal oil heating system, multi-clones, a three field dry electrostatic precipitator, press exhaust gas collection system, fans, ducts, and related appurtenances approximately located as 19 on Site Plan A.</p>

Details/Findings:	During the on-site inspection, Officer Sahibzada observed and confirmed the presence of the authorized works as described in this section.
Compliance:	In
Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.4, 1.4.1</p> <p>1.4.1: This section applies to the discharge of air contaminants from NINE FABRIC FILTER BAGHOUSES. The baghouse description, site plan number, site reference number, maximum discharge rate, and maximum particulate matter concentration limit for each baghouse are as follows:</p> <p>1.4.1 The maximum rate of discharge and concentration for each baghouse is as follows: Refer to the attached pdf.</p>
Details/Findings:	During the on-site inspection, the Permittee informed Officer Sahibzada that the maximum discharge rate and concentration is based on the manufacturer's specifications. The Permit does not require monitoring of the requirements of this section; therefore, compliance with the requirements of this section was not determined.
Compliance:	Not Determined
Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.4, 1.4.3</p> <p>1.4.3: This section applies to the discharge of air contaminants from NINE FABRIC FILTER BAGHOUSES. The baghouse description, site plan number, site reference number, maximum discharge rate, and maximum particulate matter concentration limit for each baghouse are as follows: Refer to the attached pdf.</p> <p>1.4.3 The authorized works are nine fabric filter baghouses associated with a furnish and fuel relay (high pressure), two fibre relays, a former vacuum, a line clean-up, two sander exhausts, a saw exhaust, a raw material storage ("RMS") clean-up system, and related appurtenances approximately located as shown on Site Plan A</p>
Details/Findings:	During the on-site inspection, Officer Sahibzada observed and confirmed the presence of the authorized works as described in this section.

Compliance:	In
Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.5, 1.5.1</p> <p>1.5.1: This section applies to the discharge of air contaminants from TWO BOARD COOLER EXHAUST FANS. The EMS site reference numbers for these discharges are E225338 and E221934.</p> <p>1.5.1 The maximum authorized rate of discharge for each board cooler exhaust fan is 6.25 m³/s.</p>
Details/Findings:	During the on-site inspection, the Permittee informed Officer Sahibzada that the maximum discharge rate and concentration is based on the manufacturer's specifications. The Permit does not require monitoring of the requirements of this section; therefore, compliance with the requirements of this section was not determined.
Compliance:	Not Determined
Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.5, 1.5.3</p> <p>1.5.3: This section applies to the discharge of air contaminants from TWO BOARD COOLER EXHAUST FANS. The EMS site reference numbers for these discharges are E225338 and E221934.</p> <p>1.5.3 The characteristics of discharge from each board cooler cyclone exhaust fan must not exceed: Formaldehyde: 9 mg/m³</p>
Details/Findings:	During the on-site inspection, the Permittee informed Officer Sahibzada that the maximum discharge rate and concentration is based on the manufacturer's specifications. The Permit does not require monitoring of the requirements of this section; therefore, compliance with the requirements of this section was not determined.
Compliance:	Not Determined

Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.5, 1.5.4</p> <p>1.5.4: This section applies to the discharge of air contaminants from TWO BOARD COOLER EXHAUST FANS. The EMS site reference numbers for these discharges are E225338 and E221934.</p> <p>1.5.4 The authorized works are two board cooler exhaust systems, fans, and related appurtenances approximately located as 13 and 14 on Site Plan A.</p>
Details/Findings:	During the on-site inspection, Officer Sahibzada observed and confirmed the presence of the authorized works as described in this section.
Compliance:	In
Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.6, 1.6.1</p> <p>1.6.1: This section applies to the discharge of air contaminants from one MAT REJECT CYCLONE. The EMS site reference number for this discharge is E221935.</p> <p>1.6.1 The maximum authorized rate of discharge is 28 m³/s</p>
Details/Findings:	During the on-site inspection, the Permittee informed Officer Sahibzada that the maximum discharge rate and concentration is based on the manufacturer's specifications. The Permit does not require monitoring of the requirements of this section; therefore, compliance with the requirements of this section was not determined.
Compliance:	Not Determined
Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.6, 1.6.2</p> <p>1.6.2: This section applies to the discharge of air contaminants from one MAT REJECT CYCLONE. The EMS site reference number for this discharge is E221935.</p> <p>1.6.2 The authorized discharge period is two hours per day, 365 days per year.</p>
Details/Findings:	The Permittee informed Officer Sahibzada that the discharge is intermittent and the discharge period ranges from 10 to 15 minutes and always under two hours per day.

Compliance:	In
Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.6, 1.6.3</p> <p>1.6.3: This section applies to the discharge of air contaminants from one MAT REJECT CYCLONE. The EMS site reference number for this discharge is E221935.</p> <p>1.6.3 The characteristics of the discharge must not exceed: Particulate matter 115 mg/m³</p>
Details/Findings:	During the on-site inspection, the Permittee informed Officer Sahibzada that the maximum discharge rate and concentration is based on the manufacturer's specifications. The Permit does not require monitoring of the requirements of this section; therefore, compliance with the requirements of this section was not determined.
Compliance:	Not Determined
Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.6, 1.6.4</p> <p>1.6.4: This section applies to the discharge of air contaminants from one MAT REJECT CYCLONE. The EMS site reference number for this discharge is E221935.</p> <p>1.6.4 The authorized works are a mat reject cyclone, and related appurtenances approximately located as 20 on Site Plan A</p>
Details/Findings:	During the on-site inspection, Officer Sahibzada observed and confirmed the presence of the authorized works as described in this section.
Compliance:	In
Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.7, 1.7.4</p> <p>1.7.4: This section applies to the discharge of air contaminants from various MISCELLANEOUS SOURCES.</p> <p>1.7.4 The authorized works are six press area fans, five ventilation fans, two abort cyclones, vents, and related appurtenances approximately located as shown on Site Plan A.</p>

Details/Findings:	During the on-site inspection, Officer Sahibzada observed and confirmed the presence of the authorized works as described in this section.
Compliance:	In
Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.8, 1.8.1</p> <p>1.8.1: This section applies to the discharge of air contaminants from one FACE FURNISH RELAY CYCLONE. The EMS site reference number for this discharge is E311969.</p> <p>1.8.1. The maximum authorized rate of discharge is 2.8 m³/s</p>
Details/Findings:	During the on-site inspection, the Permittee informed Officer Sahibzada that the maximum discharge rate and concentration is based on the manufacturer's specifications. The Permit does not require monitoring of the requirements of this section; therefore, compliance with the requirements of this section was not determined.
Compliance:	Not Determined
Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.8, 1.8.3</p> <p>1.8.3: This section applies to the discharge of air contaminants from one FACE FURNISH RELAY CYCLONE. The EMS site reference number for this discharge is E311969.</p> <p>1.8.3. The characteristics of the discharge must not exceed: Particulate matter: 115 mg/m³</p>
Details/Findings:	During the on-site inspection, the Permittee informed Officer Sahibzada that the maximum discharge rate and concentration is based on the manufacturer's specifications. The Permit does not require monitoring of the requirements of this section; therefore, compliance with the requirements of this section was not determined.
Compliance:	Not Determined

Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.8, 1.8.4</p> <p>1.8.4: This section applies to the discharge of air contaminants from one FACE FURNISH RELAY CYCLONE. The EMS site reference number for this discharge is E311969.</p> <p>1.8.4. The authorized works are a mat reject cyclone, and related appurtenances approximately located as 21 on Site Plan A</p>
Details/Findings:	During the on-site inspection, Officer Sahibzada observed and confirmed the presence of the authorized works as described in this section.
Compliance:	In
Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.9, 1.9.1</p> <p>1.9.1: This section applies to the discharge of air contaminants from one CORE FURNISH RELAY CYCLONE. The EMS site reference number for this discharge is E311970.</p> <p>1.9.1. The maximum authorized rate of discharge is 2.8 m³/s</p>
Details/Findings:	During the on-site inspection, the Permittee informed Officer Sahibzada that the maximum discharge rate and concentration is based on the manufacturer's specifications. The Permit does not require monitoring of the requirements of this section; therefore, compliance with the requirements of this section was not determined.
Compliance:	Not Determined
Requirement Description:	<p>1. AUTHORIZED DISCHARGES, 1.9, 1.9.3</p> <p>1.9.3: This section applies to the discharge of air contaminants from one CORE FURNISH RELAY CYCLONE. The EMS site reference number for this discharge is E311970.</p> <p>1.9.3. The characteristics of the discharge must not exceed: Particulate matter: 115 mg/m³</p>

Details/Findings:	During the on-site inspection, the Permittee informed Officer Sahibzada that the maximum discharge rate and concentration is based on the manufacturer's specifications. The Permit does not require monitoring of the requirements of this section; therefore, compliance with the requirements of this section was not determined.
Compliance:	Not Determined
Requirement Description:	1. AUTHORIZED DISCHARGES, 1.9, 1.9.4 1.9.4: This section applies to the discharge of air contaminants from one CORE FURNISH RELAY CYCLONE. The EMS site reference number for this discharge is E311970. 1.9.4. The authorized works are a mat reject cyclone, and related appurtenances approximately located as 22 on Site Plan A
Details/Findings:	During the on-site inspection, Officer Sahibzada observed and confirmed the presence of the authorized works as described in this section.
Compliance:	In
Requirement Description:	2. GENERAL REQUIREMENTS, 2.1 Bypasses 2.1: The discharge of contaminants which have bypassed the authorized treatment works is prohibited unless the approval of the Director is obtained and confirmed in writing.
Details/Findings:	During the on-site inspection, the Permittee informed Officer Sahibzada that no bypasses occurred during the Inspection Period.
Compliance:	In
Requirement Description:	2. GENERAL REQUIREMENTS, 2.2 Process Modifications 2.2: The Director must be notified prior to implementing changes to any process that may adversely affect the quality and/or quantity of the discharge. Despite notification under this section, permitted levels must not be exceeded

Details/Findings:	During the on-site inspection, the Permittee informed Officer Sahibzada that no process modifications occurred during the Inspection Period.
Compliance:	Not Applicable
Requirement Description:	<p>2. GENERAL REQUIREMENTS, 2.3 Maintenance of Works and Emergency Procedures</p> <p>2.3: The authorized works must be inspected regularly and maintained in good working order. In the event of an emergency or condition beyond the control of the Permittee which prevents effective operation of the authorized works or leads to an unauthorized discharge, the Permittee must take appropriate remedial action and notify the Director within 24hrs. All such reports must be received within 24 hours of the detection of the occurrence.</p> <p>The Director may reduce or suspend operations to protect the environment until the authorized works have been restored, and/or corrective steps taken to prevent unauthorized discharges.</p>
Details/Findings:	<p>During the on-site inspection, the Permittee informed Officer Sahibzada that they maintain the authorized works and conduct regular maintenance. The Permittee also informed Officer Sahibzada that no event of an emergency or condition beyond the control of the Permittee occurred which may have prevented effective operation of the authorized works or led to an unauthorized discharge.</p> <p>Officer Sahibzada reviewed the maintenance logs provided by the Permittee and confirmed that the authorized works are regularly inspected and maintained in good working order.</p>
Compliance:	In
Requirement Description:	<p>2. GENERAL REQUIREMENTS, 2.4 Disposal of Ash</p> <p>2.4: The residue of combustion must be removed from the energy system, electrostatic precipitator and associated works regularly and must be disposed of on a site and in a manner approved by the Director.</p>
Details/Findings:	During the on-site inspection, the Permittee informed Officer Sahibzada that the Facility hauls the residue of combustion to Joel Properties Ltd. landfill authorized by authorization number 5335.

Compliance:	In
Requirement Description:	<p>2. GENERAL REQUIREMENTS, 2.5 Fugitive Dust Control</p> <p>2.5: The Permittee must maintain a comprehensive Fugitive Dust Control Plan, acceptable to the Director, which must include management practises for all aspects of the facility that are a source of fugitive dust, including but not limited to the storage of wood residue, assessment and design rationale for control measures, timelines for installation and/or implementation of control measures and scheduled reviews of the effectiveness of control measures.</p> <p>The Fugitive Dust Control Plan must define the following:</p> <ul style="list-style-type: none"> • Procedures that the permittee and their employees will follow to control fugitive emissions. • Steps that Permittee will take to demonstrate that corrective procedures are followed and to verify the facility is controlling fugitive emissions. • Identify and describe the primary and contingent control measures and practices to control and minimize fugitive dust within the facilities boundaries. • Identify fugitive dust control record keeping requirements. • Describes procedures to assess the effectiveness of the dust control plan. • Identifies fugitive dust control internal notification requirements. • Describes the fugitive dust control employee training elements and requirements. <p>The Fugitive Dust Control Plan must be reviewed and updated annually by the Permittee. If fugitive dust becomes a concern, the Director may evaluate the sensitivity of the receiving environment, the contribution of the Permittee sources, plus any other pertinent information.</p> <p>Based on this information, the Director may require the Permittee to implement additional measures to control, monitor or assess fugitive dust emitting from the Permittees facility. A copy of the Fugitive Dust Control Plan must be made immediately available upon request by an Officer or the Director.</p>
Details/Findings:	<p>Officer Sahibzada reviewed the FDMP which included requirements 1 - 7 of this section. The Permittee informed Officer Sahibzada that they review the FDMP annually. However, a Director's acceptance was not present in the Ministry internal electronic filing system; therefore, compliance with the requirements of this section could not be determined for the Inspection Period.</p>
Compliance:	Not Determined
Requirement Description:	<p>2. GENERAL REQUIREMENTS, 2.6 Standard Conditions</p> <p>2.6: For the administration of this permit, all gaseous volumes must be converted to standard conditions of 293.15 K and 101.325 kPa with zero percent moisture.</p>

Details/Findings:	During the on-site inspection, the Permittee informed Officer Sahibzada that all gaseous volumes are converted to standard conditions of 293.15 K and 101.325 kPa with zero percent moisture.
Compliance:	In
Requirement Description:	<p>2. GENERAL REQUIREMENTS, 2.7 Authorized Non-Wood Residue Fuel</p> <p>2.7: The permittee is authorized to incinerate a maximum of 200 kg/year of on-site combustible cellulose-based spill clean-up materials, including clean-up of scrubber DAF sludge residue, resin and wax spill residue and hydrocarbon spill residue.</p> <p>In addition, the Permittee must maintain a log of all non-wood residue waste being incinerated including incineration date, waste type, amount, and reason for spill incident(s) and corrective action(s) taken.</p> <p>The on-site record and/or copy of the above activities must be made immediately available upon request by an Officer or the Director.</p>
Details/Findings:	Officer Sahibzada reviewed the Hog Records which included incineration date, waste type, amount and reason for incineration. In 2021, the Permittee incinerated a maximum of 200 kg of non-wood residue fuel as authorized by the Permit.
Compliance:	In
Requirement Description:	<p>2. GENERAL REQUIREMENTS, 2.8 Baghouse Operation</p> <p>2.8: Each baghouse must be operated and maintained in accordance with the manufacturers specifications. The Permittee must comply with the manufacturer's recommended schedule for inspecting and maintaining the baghouse.</p> <p>If the inspection frequency is not specified by the manufacturer an inspection and maintenance program must be developed by the permittee that consists of a schedule for periodic inspections that ensures that each baghouse is being adequately inspected and maintained.</p> <p>In addition, the Permittee must maintain an operating and maintenance log of all monitoring, inspection, and maintenance activities, including:</p> <ol style="list-style-type: none"> i. Incidents of malfunction(s) and corrective action(s) taken. ii. Maintenance activities, inspection schedule, and repair actions. iii. A daily log of differential pressure. <p>The on-site record and/or copy of the above activities must be made immediately available upon request by an Officer or the Director.</p>

Details/Findings:	During the on-site inspection, the Permittee informed Officer Sahibzada that they maintain each baghouse in accordance with the manufacturer's specifications. Officer Sahibzada reviewed the Maintenance Records and confirmed daily inspections, daily log of differential pressure, maintenance activities and repairs. The Permittee provided the information upon request of Officer Sahibzada.
Compliance:	In
Requirement Description:	<p>3. MONITORING REQUIREMENTS, 3.1 Emission Monitoring</p> <p>3.1: The permittee must carry out emission monitoring of the sources at the frequencies and for the parameters specified as follows:</p> <p>Dryer Cyclones: The frequency of monitoring for total particulate matter from the two Core cyclones authorised in Section 1.1 and the two Face cyclones authorised in Section 1.2 must be as follows:</p> <ul style="list-style-type: none"> a) Once per 3 months (quarterly), or b) When four consecutive quarterly stack tests within a 12 month period, show that the discharge rate and the characteristics of the discharge of the cyclones in Section 1.1 and 1.2 have not been exceeded, the frequency of monitoring may be reduced to once per year. c) Any stack test result that is in exceedance of the permitted limits will require that the frequency of monitoring be once every three months (quarterly) until four consecutive quarterly stack tests have passed as per b) above. <p>Testing for the parameter "formaldehyde" will be required for an emission test event whenever urea formaldehyde ("UF") resins are in use in the permittee's manufacturing process. When the use of UF resin is resumed the permittee must record the days of UF resin use and immediately report the resumption of UF resin use to the Director.</p> <p><u>Energy System</u>: The frequency of monitoring for total particulate matter and condensable organics from the energy system stack authorised in Section 1.3 must be once per year.</p> <p>The Director may increase, decrease, or otherwise alter the emission testing program based on the monitoring results or other relevant information available to Environmental Protection.</p>
Details/Findings:	<p>During the on-site inspection, the Permittee informed Officer Sahibzada that four consecutive quarterly stack tests within 12-month period did not exceed the requirements of Sections 1.1 and 1.2. The 2021 Report confirmed that the Permittee monitored total particulate matter and condensable organics from the energy system stack authorized in Section 1.3 once in 2021.</p> <p>The Permittee informed Officer Sahibzada that next stack test is scheduled for July 2022.</p> <p>Officer Sahibzada searched the Ministry internal electronic filing system and determined that the Director did not increase, decrease or alter the emission testing program.</p>

Compliance:	In
Requirement Description:	<p>3. MONITORING REQUIREMENTS, 3.2 Temperature Measurements</p> <p>3.2: The permittee must continuously monitor inlet and outlet temperatures of the two fibre dryers in degrees Celsius and maintain accurate records.</p>
Details/Findings:	The Permittee provided records of continuous monitoring of inlet and outlet temperatures of the two fibre dryers in degrees Celsius.
Compliance:	In
Requirement Description:	<p>3. MONITORING REQUIREMENTS, 3.3 Operating Conditions - Dryer Cyclones and Electrostatic Precipitator</p> <p>3.3: The sampling of the cyclones in Sections 1.1, 1.2, and Electrostatic Precipitator in Section 1.3 is to be done under "normal" operating conditions to ensure results of the sampling are representative of typical plant operation. Normal operating conditions means those operating conditions that are as close as reasonably practical to the 90th percentile operating conditions for the most recent 100 days during which the mill was operating, prior to the date of sampling.</p> <p>A record showing the daily average dryer inlet temperatures and production rates for the previous 100 days during which the mill was operating prior sampling, along with calculation of 90th percentile for each source specified in Sections 1.1 and 1.2</p> <p>The permittee must prepare and maintain records documenting plant operating conditions during sampling to the satisfaction of the Director, Environmental Protection. The records must include, but not be limited to:</p> <ul style="list-style-type: none"> i. Dryer inlet temperatures for the 100 days prior to the test dates with the 90th percentile calculation. ii. Production rates for 100 days prior to the test dates with the 90th percentile calculation. <p>The operating conditions recorded during the sampling period must be compared with the annual average.</p> <p>A permittee representative must prepare and sign a statement confirming the operating conditions in place during the sampling period were representative of typical plant operation.</p>
Details/Findings:	The 2021 Report confirmed the requirements of this section were met. A Permittee representative prepared and signed a statement confirming the operating conditions in place during the sampling period were representative of typical plant operation.

Compliance:	In
Requirement Description:	<p>3. MONITORING REQUIREMENTS, 3.4 Ambient Air Monitoring</p> <p>3.4: The Director may require the permittee to undertake ambient air quality monitoring and related studies. The Director may alter, impose or otherwise amend limits on the daily emission contaminant loadings, based on these and/or other studies of air quality impact</p>
Details/Findings:	<p>Officer Sahibzada searched the Ministry internal electronic filing system and determined that the Director did not require the Permittee to undertake ambient air quality monitoring and related studies. Therefore, compliance with this requirement was not applicable for the Inspection Period.</p>
Compliance:	Not Applicable
Requirement Description:	<p>3. MONITORING REQUIREMENTS, 3.5 Sampling Procedures</p> <p>3.5: Sampling is to be carried out in accordance with the procedures described in the most recent edition of the "British Columbia Field Sampling Manual for Continuous Monitoring Plus the Collection of Air, Air-Emission, Water, Wastewater, Soil, Sediment, and Biological Samples, 2003 Edition (Permittee)", or by suitable alternative procedures as authorized by the Director.</p> <p>A copy of the above manual may be purchased from the Queen's Printer Publications Centre, P. O. Box 9452, Stn. Provo Gov't. Victoria, British Columbia, V8W 9V7 (1-800-663-6105 or (250) 387-6409). A copy of the manual is also available for inspection at all Environmental Protection offices</p>
Details/Findings:	<p>The 2021 Report confirmed that sampling was conducted for condensable organics and total particulate using the State of Oregon Method 7, an accepted method by the BC Ministry of Environment and Climate Change Strategy, listed in the latest revision of the BC Field Sampling Manual Part B Appendix 7.1.</p>
Compliance:	In

Requirement Description:	<p>3. MONITORING REQUIREMENTS, 3.8 Quality Assurance/Quality Control Requirements</p> <p>3.8: The permittee must develop, maintain and execute a quality control/quality assurance ("QA/QC") program to the satisfaction of the Director, Environmental Protection. The QA/QC program must be consistent with Part A of <u>British Columbia Field Sampling Manual for Continuous Monitoring Plus the Collection of Air, Air-Emission, Water, Wastewater, Soil, Sediment, and Biological Samples, (2003 Permittee Edition)</u>, or most recent edition and with Section 2.4.5 of "NCASI Method CIIWP-98.01 Chilled Impinger Method For Use At Wood Products Mills To Measure Formaldehyde, Methanol, and Phenol"</p> <p>The Permittee must provide the Director, Environmental Protection with any updates to this manual within 30 days of adoption. Analysis of samples for parameters designated under the Environmental Data Quality Assurance Regulation must be at a laboratory registered for the designated parameter under the Regulation.</p>
Details/Findings:	<p>Officer Sahibzada reviewed the QA/QC Program which included references to the requirements of this section; however, it could not be determined if the program was to the satisfaction of the Director, Environmental Protection. Therefore, compliance with this requirement was not determined for the Inspection Period.</p>
Compliance:	<p>Not Determined</p>
Requirement Description:	<p>3. MONITORING REQUIREMENTS, 3.9 Non-Compliant Sample Retests</p> <p>3.9: If any stack sampling event is found to exceed any of the limits identified in Section 1.1, 1.2, and 1.3 of this permit, the Permittee must immediately notify the Director or designate by email (EnvironmentalCompliance@gov.bc.ca), and re-test the non-compliant emission source within 45 calendar days of receipt of the failed test result. The Director may provide additional direction on the timing of the follow-up tests.</p> <p>If the results of the re-test exceed any of the permit limits, then the discharge from the non-compliant emission source must cease until the problem has been corrected, unless authorized in writing, by the Director. Upon completion of the corrective action, the Permittee may resume operation of the authorized works. However, a third confirmation test must be conducted as soon as practicable to ensure the works meet the allowable limits. This additional testing and verification do not grant an allowance to exceed permit limits.</p> <p>The Director may provide additional direction on the timing of the follow-up tests.</p>
Details/Findings:	<p>During the on-site inspection, the Permittee informed Officer Sahibzada that no stack test exceeded the limits during the Inspection Period. The 2021 Report confirmed that none of the stack tests exceeded the Permit requirements; therefore, compliance with this requirement was not applicable for the Inspection Period.</p>

Compliance:	Not Applicable
Requirement Description:	<p>4. REPORTING REQUIREMENTS, 4.1 Reporting</p> <p>4.1: The Permittee must submit all emission monitoring data required by Subsection 3.1 within 45 days of the sampling period. The source testing report must include the records required by subsection 3.3 and 3.8 of this permit.</p> <p>The Permittee must submit all data required to be submitted under this authorization by email to the Ministry's Routine Environmental Reporting Submission Mailbox (RERSM) at EnvAuthorizationsReporting@gov.bc.ca or as otherwise instructed by the Director. For guidelines on how to properly name the files and email subject lines or for more information visit the Ministry website:</p> <p>http://www2.gov.bc.ca/gov/content/environment/waste-management/waste-discharge-authorization/data-and-report-submissions/routine-environmental-reporting-submission-mailbox .</p> <p>The Permittee must cause each data submission required by this authorization to include a statement outlining the number of exceedances of permitted discharges that occurred during the reporting period, the dates of each such exceedance, an explanation as to the cause of the exceedances, and a description of the measures taken by the Permittee to rectify the cause of each such exceedance. If no exceedances occurred over the reporting period, the required statement may instead indicate that no exceedance of permitted discharges occurred during the reporting period.</p>
Details/Findings:	<p>Officer Sahibzada confirmed that the Permittee submitted all emission monitoring data required by Subsection 3.1 within 45 days of the sampling period. The 2021 Report included the records required by Subsection 3.3 and 3.8 of this Permit.</p> <p>The Permittee submitted the 2021 Report to the RERSM email. There were no exceedances during the reporting period, therefore, this requirement was not applicable. The 2021 Report stated that the face and core dryer cyclone results met the Permit limits.</p>
Compliance:	In
Requirement Description:	<p>4. REPORTING REQUIREMENTS, 4.2 Non-compliance Notification</p> <p>4.2: The Permittee must immediately notify the Director or designate by email at EnvironmentalCompliance@gov.bc.ca, or as otherwise instructed by the Director of any non-compliance with the requirements of this authorization by the Permittee and take remedial action to remedy any effects of such non-compliance.</p> <p>The Permittee must provide the Director with written confirmation of all such non-compliance events, including available test results within 48 hours of the original notification by email at EnvironmentalCompliance@gov.bc.ca, or as otherwise instructed by the Director.</p>

Details/Findings:	During the on-site inspection, the Permittee informed Officer Sahibzada that non-compliance events did not occur during the Inspection Period. Therefore, compliance with the requirements of sections 4.2 and 4.3 were not applicable for the Inspection Period.
Compliance:	Not Applicable

Compliance History:
2018-03-19 IR 80899 Advisory: Emission Monitoring 3.1, Non-Compliance Reporting 3.11
2015-11-24 IR19233 Warning: Total particulate matter and condensable organics exceedance
2014-02-25 IR17061 Advisory: Total particulate matter and condensable organics exceedance
2013-10-31 IR15042 Notice of Compliance
2013-06-06 IR9365 Notice of Compliance
2012-06-26 IR2948 Notice of Compliance

The Ministry of Environment Compliance and Enforcement Policy and Procedure (C&E Policy) prescribes common requirements and procedures for all Ministry staff to ensure consistent and risk-based assessment and response to non-compliance. Using the Non-Compliance Decision Matrix, the compliance determination for this inspection has been assessed as **Level 0, Category 0, Notice**.

More information about Environmental Compliance, the Non-Compliance Decision Matrix, and reporting and data submission requirements can be found at the links below:
General compliance information:
www.gov.bc.ca/environmentalcompliance
Non-Compliance Decision Matrix information:
www.gov.bc.ca/environment/how-compliance-is-assessed
Reporting and data submission requirements (to be sent to EnvAuthorizationsReporting@gov.bc.ca):
<https://www2.gov.bc.ca/gov/content/environment/waste-management/waste-discharge-authorization/comply>

Please be advised that this inspection report may be published on the provincial government website within 7 days.

If you have any questions about this letter, please contact the undersigned.

Yours truly,

Rafiullah Sahibzada
Environmental Protection Officer

cc:

Attachments:

Deliver via:
Email: Fax: Mail:
Registered Mail: Hand Delivery:

**Ministry of Environment
and Climate Change
Strategy**

Compliance
Environmental
Protection Division

Mailing Address:
400-640 Borland St
Williams Lake BC V2G 4T1

Telephone: 250 398 4530
Facsimile: 250 398 4214
Website: www.gov.bc.ca/env

DISCLAIMER:

Please note that sections of the permit, regulation or code of practice referenced in this inspection record are for guidance and are not the official version. Please refer to the original permit, regulation or code of practice.

To see the most up to date version of the regulations and codes of practices please visit
<http://www.bclaws.ca>

If you require a copy of the original permit, please contact the inspector noted on this inspection record.

It is also important to note that this inspection record does not necessarily reflect each requirement or condition of the authorization therefore compliance is noted only for the requirements or conditions listed in the inspection record.