



Environmental Approvals Branch Observations
of Environmental Compliance Approval Applications

Air Practitioners Group Meeting
November 1, 2012

Purpose

To have a discussion with the Air Practitioners on some of EAB's observations of ECA applications and ESDM's.

1. Scope of Application

1. Change of scope during or after technical review of application:
 - Examples include: addition/removal of processes, equipment, etc.
 - Results in the need to re-evaluate the application and complete the technical review again, either partially or completely.
 - New scope must be assessed to determine whether re-posting on the Environmental Bill of Rights (EBR) Registry is required.
 - Complete technical review of submission will take a longer period of time as a result of requesting and waiting for further information related to new scope.

2. Acoustic Assessment Report

2. Acoustic Assessment Report not included as part of application submission:
 - Potential noise impacts need to be taken into consideration as part of the technical review process. The Ministry no longer allows for the submission of 'Deferred Acoustic Assessment Reports' following issuance of an Approval.
 - All Points of Reception (POR's), including hotels and places of worship, must be identified and noise levels determined at their location.
 - Review engineers must request the additional information before proceeding with technical review of application.
 - Are Ministry Guidelines clear enough in determining whether an Acoustic Assessment Report is required?

3. Meteorological Data

3. No s.13(1) Notice (Meteorological Data) included even though local meteorological data used in modeling:
 - This requires the review engineer to contact the Environmental Monitoring and Reporting Branch (EMRB) to verify whether collected meteorological data has been sent by the applicant and processed.
 - The review engineer may also have to follow up with the applicant to request submission of the proper form related to use of site specific meteorological data.
 - Does the Ministry clearly describe the steps required for approval of site-specific Meteorological Data?

4. Emission Summary and Dispersion Modeling Report

4. Emission Summary and Dispersion Modeling (ESDM) Report too concise:
- Examples include: inadequate description of processes and details related to air pollution control equipment.
 - More specific details will allow for more collaboration with other review engineers, specifically if the application is for a multi-media Environmental Compliance Approval (ECA).
 - Detailed submissions will result in less delays in the technical review process and allow review engineers to have all the necessary information in order to complete a full technical review.
 - ACME's & Guidance documents should assist with this.

5. Referenced Documents or Reports

5. Documents referenced in ESDM report that are not publicly available or included in report:
 - Examples include: reports or studies conducted by agencies that have not been released publicly.
 - Review engineer may have to spend additional time trying to locate referenced documents.
 - Missing documentation results in review engineers requesting additional information from the applicant, as a complete technical review cannot be undertaken without all supporting documentation.
 - Including a hard-copy of referenced documents in the Appendix of an ESDM Report would allow the Ministry to effectively review the subject material.

6. Self-Contamination Calculations

6. Self-contamination calculations either not included or completed using incorrect equations:
- Exclusion of self-contamination calculations mean the review engineer cannot complete their technical review of the submission. Emission calculations cannot be verified by the engineers if they are not included in the submission package.
 - Delays would be encountered in the review process in order for the engineer to:
 - obtain the documentation showing how the calculations were completed, or
 - request re-submission of calculations that were completed incorrectly
 - Does the Ministry accurately and clearly describe what methods are to be used to calculate self-contamination?

7. Emission Calculations

7. Emission calculations not completed correctly

- Issues include:
 - not using maximum production rates
 - sample calculations not included in report, or
 - inadequate supporting information on calculations submitted (e.g. use of source testing results from another facility without accounting for differences in production rate)
- Calculations submitted would not be 'worst-case scenario' emissions, and review engineers will have to request additional information and possible re-submission of calculations in order to complete their reviews.

8. Dispersion Modeling

8. Dispersion Modeling Deficiencies

- Examples include:
 - no electronic copies of input/output files
 - regional meteorological data does not match land use (i.e. Urban files used for rural location)
 - modeling sources do not match sources listed in Source Summary Table
 - no drawings or site plans to illustrate location of sources or distances used in calculations
- Review engineer will be unable to determine the extent of how emissions from the facility affect surrounding areas or where certain contaminants are originating from. Additional information would need to be requested from the applicant in order to complete the technical review and verify emission rates from the facility.

Conclusions

- The eight items discussed in this presentation are the result of feedback from Air Engineers at the Environmental Approvals Branch (EAB) on how to improve ESDM Report submissions.
- The Ministry is striving to improve our screening practices and our guidance material, but additional feedback from Air Practitioners will allow EAB to examine whether any Ministry Guidelines may need to be updated to better outline the requirements of an ECA application.
- The Ministry looks forward to continued collaboration with Air Practitioners to achieve a more thorough application submission and review process.