

June 22, 2016

APWL - Williams Lake Renewal Project Team Comments

FOR THE RECORD ...

1. For over a year Atlantic Power Williams Lake (APWL) has reached out to numerous community groups, local governments, First Nations bands, provincial ministries and individuals. Prior to the legislated 30-day public comment period, we held an Open House in June of 2015, attended by approximately 70 people. We also opened the plant for tours in March of this year (over 60 people took advantage of the opportunity) and our second Open House will occur on June 28.
2. We have conducted extensive scientific study. RWDI, a respected consulting firm, conducted the third-party review of our emissions and the impacts on ambient air, which confirmed that we will remain well within all applicable standards designed to protect ambient air quality.
3. In addition to the required air modeling, APWL commissioned Intrinsik to look at health impacts on the people of Williams Lake. Intrinsik found no cause for concern.
4. The Williams Lake Indian Band (WLIB) hired an independent environmental firm, Teranis, to review our studies. Teranis confirmed our results and WLIB endorsed the Renewal Project. WLIB told us they believe what we are doing is consistent with their goal of sound environmental stewardship of the land.
5. MOE reviewed our studies and has prepared a draft permit.
6. Interior Health is participating in the review process along with MOE.
7. MOE's draft permit provides for numerous additional restrictions when burning rail ties, which we have agreed to, in order to ensure complete combustion and adherence to emissions limits and monitoring protocols.
8. We have agreed to lower our existing particulate permit limit by 60% (from 50 mg/m³ to 20 mg/m³), which will apply at all times, regardless of the fuel being used.
9. The public consultation process has been long, extensive and fully transparent. All studies, analyses, consultation logs and the draft permit are available to the public.

10. There have been many exaggerations and misrepresentations of the facts related to the Renewal Project on social media and in letters to the editor. For The Record will shed light on some of those exaggerations:
- A. This is not a choice of roadside logging debris (RLD) *or* rail ties. Our traditional fibre supply is declining. Rail ties will provide a partial solution, but we will need to find a way to make RLD a viable additional supply over the long term. Policymakers, including the Ministry of Forests, Lands and Natural Resource Operations (FLNRO), will need to be involved and new public policy is needed to make RLD a viable fuel supply.
 - B. The quantity of contaminants in rail ties is manageable. If we were to achieve our maximum expected rail tie volume in a year (100,000 tonnes of ties), the creosote contained in those ties would be about 7,100 tonnes, which would represent about 2% of our total fuel supply.
 - C. It has been pointed out that whole ties are of less concern than shredded ties. This statement is true, but rail ties do break down over time. We have agreed to cover any whole ties stored on site, and shredded tie storage will be contained in a fully enclosed bin and limited to a maximum quantity of 3,000 tonnes.
 - D. We will comply with all applicable standards governing emissions limits and monitoring requirements. Despite the fact we have made this commitment, those opposed point to increased levels of certain trace elements, dioxins and furans in particular, as “evidence” that what we are proposing is unacceptable.
 - E. Some facts about the Renewal Project’s dioxins and furans:
 - Opponents say dioxins and furans in our ash will increase by over 1,500%. They are correct. What they aren’t telling you is the actual number will go from 24 parts per trillion to 400 parts per trillion. The applicable standard is *70,000 parts per trillion* (70 parts per billion). Therefore, even with the increase, the dioxin and furan content in our ash will be 173 times lower than the standard that is applied to other industrial sites throughout the province.
 - Dioxins and furans in our emissions are less than 2% of the standard applied to other biomass plants in the province.
 - Opponents claim that our emissions will accumulate over time in the soil and become toxic. We had Intrinsik study the accumulation in soil and looked at the concentration as compared to common foods which pick up traces of dioxins and furans in the food chain. It turns out that if we burned 100% rail ties for 80 years, the cumulative impact on the soil would be 6.5% of the dioxins and furans found in hamburger and also much less than what is found in milk, ice cream, steak and eggs.

- F. The plant is equipped with a fire suppression system and trained emergency response team, manned 24/7. Fire risk at the plant is managed. Wildfire risk of rail ties piling up in the forest should be a cause for concern.
 - G. Delivery plans for the ties are uncertain and cannot be made final until we obtain the permit. But tie deliveries offset delivery of other material and should not increase truck traffic.
 - H. Our only shredding operation in Williams Lake will be on the power plant site.
 - I. Ash is well within applicable standards and will go to the existing landfill in accordance with our current permit #8809.
11. The Renewal Project is about assuring BC Hydro the power plant is a viable source of firm baseload electricity for the province. Rail ties are a component of the fuel mix needed to make that case. Rail ties are currently an environmental problem that can be used by the power plant as a beneficial resource while solving the problem.
12. The Williams Lake community has a stake in keeping this business viable. We are a large part of the local economy and tax base.
13. The proposed greenhouse project has a huge stake in seeing the Renewal Project succeed.
14. The mills that remain need a means of disposal of traditional fibre waste products.
15. The plant represents a potential future solution for the logging debris problem.