Ministry of the Environment and Climate Change

Ministère de l'Environnement et de l'Action en Matière de Changement Climatique

Ontario

Central Region Technical Support Section

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July 8, 2014

Mirka Januszkiewicz, P. Eng Director, Waste Management The Regional Municipality of Durham 605 Rossland Road East Whitby ON L1N 6A3

Laura McDowell, P.Eng Director, Environmental Promotion and Protection The Regional Municipality of York 17250 Yonge Street Newmarket ON L3Y 6Z1

Re: Durham/York Energy from Waste Project

Submission of Annual Ambient Air Monitoring Report (May to December 2013), Ambient Air Monitoring 2nd (May to June 2013) and 3rd (July to September 2013) Revised Quarterly Reports and Ambient Air Monitoring 4th Quarterly Report (October to December 2013)

Environmental Assessment Condition 11

Dear Ms. Januszkiewicz and Ms. McDowell,

Thank you for the above-noted submission. A data validation review was conducted by the Ministry of the Environment and Climate Change (MOECC), Central Region, for the Annual Ambient Air Monitoring Report (May to December 2013) along with the Ambient Air Monitoring 2nd, 3rd and 4th Quarterly Reports prepared by Stantec for the Rundle and Courtice Stations in Clarington. The Ambient Air Monitoring 2nd, 3rd and 4th Quarterly Reports respectively cover the time periods of May to June, July to September, and October to December 2013.

This review pertains to the continuous parameters, including sulphur dioxide (SO_2), nitrogen oxides (NO_x) and particulate matter smaller than 2.5 microns ($PM_{2.5}$), as well as non-continuous parameters comprised of total suspended particulate (TSP), metals, polycyclic aromatic hydrocarbons (PAHs) and dioxins and furans.

The ministry's email correspondence on the 2nd and 3rd Quarterly Reports highlighted our previous comments for the continuous and the non-continuous parameters. Based on the ministry's review of the revised 2nd and 3rd Quarterly Reports and the 4th Quarterly Report submission, all previous comments that pertained to actual flows and units of measurement have been addressed.

Based on our review of the supporting documentation provided and the measurements reported in 2013, the following comments are offered at this time for your consideration.

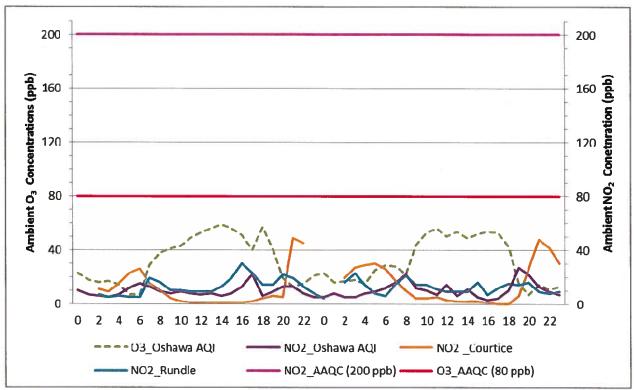
1. Continuous Parameters (May to December 2013)

Based on the review of the continuous parameters, SO₂ is deemed to be valid for the Quarterly Report submissions in 2013. However, the validity of NO₂ and PM_{2.5} on the following dates is unclear and should be clarified:

- NO₂ measurements at Courtice Station on May 6 and 7, 2013 commencing at 21:00 and 20:00, respectively, as shown in Figure 1.
- PM_{2.5} on June 30 to July 3, 2013 at Courtice Station illustrates blocks of repeated hourly values as shown in Figure 2 on July 2, 2013.

In addition, we recommend noting that the high levels of PM_{2.5} recorded at Courtice and Rundle were also observed at the Oshawa AQI due to forest fires in Quebec during the period of June 30 to July 3, 2013.

Figure 1: NO₂ Hourly Measurements on May 6-7, 2013



----PM2.5_Oshawa AQI

Figure 2: PM_{2.5} Hourly Measurements on July 2, 2013 at Courtice Station

2. Non-Continuous Parameters (May to December 2013)

---- 03_Oshawa AQI

-PM2.5_Courtice

The supporting documentation and reported flows for the HiVols for TSP and metals and the PUF rates for the PAH measurements and dioxins and furans generally comply with the guidelines of the Ministry's Operations Manual and the approved Ambient Monitoring Plan, with the exception of the flows for TSP and metal samples which have been rectified in 2014 and the flows noted below for PAHs and dioxins and furans.

The daily flows are below the flow range recommended by the ministry for PAHs and dioxins and furans on the sampling dates noted below. On these dates, we recommend adding notes explaining that the flows are below the flow range of 8.0 cfm +/- 10% (i.e. 7.2-8.8 cfm) as stipulated in the *Operations Manual for Air Quality Monitoring in Ontario for PAHs and D/F*.

PAHs

- Q3 Courtice, July 3rd, 15th and 27th 6.7, 7.1, 6.4 cfm respectively
- Q3 range of flow 6.4-8.3 cfm for Courtice and 7.6-8.2 cfm for Rundle
- Q4 range of flow 7.7-8.7 cfm for Courtice and 6.8-8.8 cfm for Rundle
- Q4 Rundle, Oct 7th 6.8 cfm

Dioxins & Furans

- Q3 Courtice, July 3rd and 27th (same as PAHs) 6.7,6.4 cfm respectively
- Q4 Rundle, Oct 7th 6.8 cfm

Based on the supporting documentation provided, the non-continuous data for Rundle and Courtice Stations from May to December 2013 appears to be valid with the exception of the daily flows which should be explained as notes under the data tables.

3. General Comments – 2013 Annual Ambient Air Quality Monitoring Report

We recommend revising the following statement which is currently presented in the Executive Summary of the Annual Ambient Air Quality Monitoring Report for the Durham York Energy Centre to reflect the schedule changes for this project:

"...The DYEC was under construction in 2013, with commissioning of the facility currently anticipated to start in July 2014. Based on this schedule, 14 months of background air quality data will be collected prior to the start of the facility operations." (Executive Summary, pg. vi)

Please note that there was substantial data loss for NO_2 and $PM_{2.5}$ due to technical instrumentation problems at the beginning of the program. The above statement should integrate this note.

In addition, under Table 2-3 in the Annual Report entitled "Summary of Air Quality Criteria for Metals", we recommend revision of Note D to replace "O. Reg. 419 24 Hour Guideline" with "Future O. Reg 419 standard that will be in effect in 2016".

Thank you for the opportunity to comment on this project. We look forward to receiving your response and participating in a meeting with the Regions as noted in Condition 11.4(d) of the Notice of Approval for this project. Please contact me if you have any questions on the above comments.

Yours Sincerely,

Dan Orr

Manager, Technical Support Section

cc: Marinha Antunes, Air Quality Analyst, Technical Support Section, MOECC
Dan Delaquis, Supervisor (A), Air, Pesticides and Environmental Planning, MOECC
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