PERMIT GVA0380

Pursuant to:
Greater Vancouver Regional District Air Quality Management Bylaw No. 1082, 2008
and the BC Environmental Management Act, S.B.C 2003, c.53

Issued to:
Columbia Containers Ltd.
(the "Permittee")

To Authorize:
the discharge of air contaminants to the air from
a grain receiving, storage, and loading facility

Located at:
2775 Commissioner Street, Vancouver, BC V5K 1A1

Effective Period:
The terms and conditions set out in the Permit apply to the existing or planned works as of
March 14, 2019 and this permit will expire on February 01, 2033.

All previous versions of this Permit are invalid.

Issued: November 09, 1992
Amended: March 14, 2019

Kathy Preston, Ph.D., P.Eng.
Assistant District Director
SECTION 1 – AUTHORIZED EMISSION SOURCES

Authorization to discharge air contaminants from the authorized Emission Sources and Works listed below is subject to the specified terms and conditions.

Approximate locations of the emission sources are shown on the Site Plan in section 4.

EMISSION SOURCE 03: Product receiving, conveyance, load out, and storage discharging through a Baghouse Exhaust(s).

MAXIMUM EMISSION FLOW RATE: 605 m³/min
MAXIMUM ANNUAL OPERATING HOURS: 8760 h/y

MAXIMUM EMISSION QUALITY:
1. 18 mg/m³ Particulate Matter
2. 10% Opacity.

WORKS AND PROCEDURES:
A Donaldson Torit Model 232 RFW 8 AW dust baghouse and related appurtenances, together with good operating practices, discharging horizontally from a rain-capped vent at a height of 8.8 m above ground with an inside diameter of 0.71 m and ambient gas exit temperature.

Receiving:
Rail and truck unloading activities shall be conducted within an enclosed building (except for the building entrance and exit). Grain unloading shall utilize methods, including but not limited to choke unloading, to minimize the potential for fugitive dust generation.

All three unloading pits (2 rail, 1 truck) shall be equipped with mechanically actuated pit baffles and dust aspiration to the baghouse. Unloading shall be restricted to one of three unloading pits at any given time. Downdraft air ventilation of the receiving pits shall be maintained at all times during grain receiving activities.

Continuous monitoring of downdraft ventilation, including but not limited to differential pressure monitoring, shall be employed in a manner approved in writing by the District Director. A daily log of the differential pressure readings shall be maintained and available for inspection for a period of two years.

Air with entrained dust particles from the receiving pits and conveyor system shall be collected and routed through ducts to the baghouse before exhausting to atmosphere.

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Conveyance & storage:
The fully enclosed Hi-Roller conveyance system (to and from temporary product storage in six (6), enclosed, fixed-roof temporary storage silos) is rated for a maximum of 700 tonnes per hour. All silos shall be equipped with high-level alarms. Air from all conveyance transition points shall be collected by dust pick-ups routing to and controlled by the baghouse.

Load out:
Container and truck load out activities shall be conducted within an enclosed building (except for the building entrance and exit). Air with entrained particles from all load out activities shall be collected and routed through spouts and ducting maintained under negative air pressure to the baghouse before exhausting to atmosphere.

General:
All receiving, conveyance, storage, and load out activities shall be conducted in such a manner as to effectively control fugitive dust.

Suspension of Operations and Event Notifications:
Receiving and load out operations shall be suspended if dust is observed exiting the enclosed receiving or load out building.

All incidents of dust being observed exiting the enclosed receiving or load out building shall be reported immediately upon awareness by the permittee to the District Director using Metro Vancouver’s 24-hour number: 604-436-6777 and/or regulationenforcement@metrovancouver.org.

Notification shall be made to Metro Vancouver’s 24-hour number: 604-436-6777, or to regulationenforcement@metrovancouver.org one week in advance of soy loading. Updates are to be provided as necessary.

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SECTION 2 – GENERAL REQUIREMENTS AND CONDITIONS

A. AUTHORIZED WORKS, PROCEDURES AND SOURCES
Works and procedures, which this permit authorizes in order to control the discharge of air contaminants, shall be employed during all operating periods of the related sources. The Permittee shall regularly inspect and maintain all such works, procedures and sources.

The District Director must be provided with reasonable notice of any changes to or replacement of authorized works, procedures or sources. Any changes to or replacement of authorized works, procedures or sources must be approved by the District Director in advance of operation. For certainty, this does not include routine maintenance or repair.

The discharge criteria described in Section 1 of this permit are applicable on the issued or last amended date of this permit unless specified otherwise. If a date different to the issued or last amended date is specified, the existing works, procedures and sources must be maintained in good operating condition and operated in a manner to minimize emissions.

B. NOTIFICATION OF MONITORING NON-COMPLIANCE
The District Director must be notified immediately of any emission monitoring results, whether from a continuous emissions monitor or periodic testing, which exceed the quantity or quality authorized in Section 1 of this permit. Notification shall be made to Metro Vancouver's 24-hour number: 604-436-6777, or to regulationenforcement@metrovancouver.org.

C. POLLUTION NOT PERMITTED
Notwithstanding any conditions in this permit, no person shall discharge or allow or cause the discharge of any air contaminant so as to cause pollution as defined in the Greater Vancouver Regional District Air Quality Management Bylaw No. 1082, 2008 and the Environmental Management Act.

D. BYPASSES
The discharge of air contaminants that have bypassed authorized control works is prohibited unless advance approval has been obtained and confirmed in writing from the District Director.

E. EMERGENCY PROCEDURES
In the event of an emergency or condition beyond the control of the Permittee that prevents effective operation of the authorized works or procedures or leads to unauthorized discharge, the Permittee shall:

1. Comply with all applicable statutory requirements;
2. Immediately notify the District Director of the emergency or condition and of contingency actions invoked or planned to mitigate adverse impacts and restore compliance; Notification shall be made to Metro Vancouver’s 24-hour number: 604-436-6777; and
3. Take appropriate remedial action for the prevention or mitigation of pollution.

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The District Director may specify contingency actions to be implemented to protect human health and the environment while authorized works are being restored and/or corrective actions are being taken to prevent unauthorized discharges.

If an emergency situation results in a "spill" as defined in the Environmental Management Act Spill Reporting Regulation, the spill shall also be reported immediately to the Provincial Emergency Program by telephoning 1-800-663-3456.

F. AMENDMENTS
The terms and conditions of this permit may be amended, as authorized by applicable legislation. New works, procedures or sources or alterations to existing works, procedures or sources must receive authorization in advance of operation.

G. STANDARD CONDITIONS AND DEFINITIONS
Unless otherwise specified, the following applies to this permit:

1. Gaseous volumes are corrected to standard conditions of 20 degrees Celsius (°C) and 101.325 kilo Pascals (kPa) with zero percent moisture.
2. Contaminant concentrations from the combustion of specific fuel types are corrected to the following Oxygen content, unless specified otherwise:
   - 3% O₂ for natural gas and fuel oil; or
   - 8% O₂ for wood fuel
3. Where compliance testing is required, each contaminant concentration limit in this permit will be assessed for compliance based on a valid test using test methods approved by the District Director.
4. Visual opacity measurements are made at the point of maximum density, nearest the discharge point and exclude the effect of condensed, uncombined water droplets. Compliance determinations are based on a six-minute average in accordance with the United States Environmental Protection Agency (US EPA) Method 9: Visual Determination of the Opacity of Emissions from Stationary Sources. Continuous Emission Monitor System (CEMS) opacity compliance determinations are based on a one-hour average (taken from the top of each hour).
5. If authorized in Section 1 of this permit, standby fuel use is restricted to a maximum of 350 hours per year and to those periods during which the primary authorized fuel is not available. Fuel oil sulphur content shall not exceed 15 milligrams per kilogram (mg/kg) and emissions during fuel oil firing shall not exceed 10% opacity.
6. Definitions in the Environmental Management Act and Air Quality Management Bylaw apply to terminology used in this permit.
7. Threshold Limit Values (TLV) refer to the Time Weighted Average (TWA) exposure limits for substances specified in the American Conference of Governmental Industrial Hygienists Threshold Limit Values handbook, current on the latest date that this permit issuance or amendment came into effect.
8. Sulphur Oxides (SO₂) are expressed as Sulphur Dioxide.
9. Nitrogen Oxides (NOₓ) are expressed as Nitrogen Dioxide.

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10. The Canadian Council of Ministers of the Environment (CCME) "Environmental Guidelines for Controlling Emissions of Volatile Organic Compounds from Aboveground Storage Tanks (PN1180)" shall be adhered to for all applicable tanks unless otherwise stated in this permit.

11. Authorized 'Maximum Annual Operating Hours' of 8760 hours per year for an emission source is equivalent to authorization for continuous operation of the emission source for an entire calendar year, including leap years.

H. RECORDS RETENTION
All records and supporting documentation relating to this permit must be kept for at least three years after the date of preparation or receipt thereof, and be made available for inspection within 48 hours of a request by an Officer.

I. HEATING, VENTILATION, AIR CONDITIONING AND INTERNAL COMBUSTION ENGINES
Air contaminants discharged from any natural gas-fired heating, ventilation or air conditioning system for buildings and any internal combustion engine located at the discharge site shall be maintained and operated in a manner prescribed by the manufacturer to ensure good combustion of the fuel with minimum discharge of air contaminants.
SECTION 3 — REPORTING REQUIREMENTS

A. MONITORING REQUIREMENTS AND REPORTING

Unless otherwise approved in writing by the District Director prior to any sampling or analysis, all measurements shall be performed by an independent agency in accordance with Metro Vancouver Air Emissions Sampling Program Manual of Methods and Standard Operating Procedures and the BC Ministry of Environment Field Sampling Manual, as they may be amended from time to time. Any variance from these procedures must receive prior written approval from the District Director.

A minimum of 5 working days advance notice must be given prior to taking measurements required by this Monitoring and Sampling Program. Notification must be given to the Metro Vancouver Environmental Regulation & Enforcement Division (phone 604-436-6777, Fax 604-436-6707, email regulationenforcement@metrovancouver.org).

Unless otherwise specified, sampling shall be performed under operating conditions representative of the previous 90 calendar days of operation. All field data and calculations must be submitted with monitoring results and they shall be reported in the metric units which are used in this permit. These submissions shall include process data relevant to the operation of the source of the emissions and the performance of the emission control works.

The Permittee shall conduct the following monitoring and sampling and submit electronic reports of the results to the District Director by the dates specified below using a password enabled web based application provided by Metro Vancouver.

<table>
<thead>
<tr>
<th>EMISSION SOURCE</th>
<th>INITIAL DUE DATE</th>
<th>SUBSEQUENT DUE DATES</th>
<th>REQUIREMENT</th>
<th>PARAMETER(S)</th>
<th>TEST METHOD</th>
<th>REPORT TYPE</th>
</tr>
</thead>
<tbody>
<tr>
<td>03</td>
<td>October 31, 2021</td>
<td>Every 3 years, on or before October 31 every third year.</td>
<td>Written report detailing the measured discharge rate and concentration of particulate matter in the emissions.</td>
<td>Particulate Matter</td>
<td>Those approved by Metro Vancouver</td>
<td>Stack</td>
</tr>
</tbody>
</table>

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B. INFORMATION REPORTING REQUIREMENTS

The Permittee shall submit electronic reports containing the required information to the District Director by the dates specified below using a password enabled web based application provided by Metro Vancouver.

<table>
<thead>
<tr>
<th>EMISSION SOURCE</th>
<th>INITIAL DUE DATE</th>
<th>SUBSEQUENT DUE DATES</th>
<th>REQUIREMENT</th>
<th>REPORT TYPE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Facility</td>
<td>March 31, 2019</td>
<td>On or before March 31 for each subsequent year.</td>
<td>Written report providing details of the types and amounts of principal products produced and principal raw materials used in the preceding calendar year.</td>
<td>Materials and Products</td>
</tr>
<tr>
<td>03</td>
<td>March 31, 2019</td>
<td>On or before March 31 for each subsequent year.</td>
<td>Written report indicating inspection frequency, bag condition and action, taken or proposed, to solve any problems detected for the baghouse(s).</td>
<td>Baghouse</td>
</tr>
<tr>
<td>03</td>
<td>March 31, 2019</td>
<td>On or before March 31 for each subsequent year.</td>
<td>Written report providing details of the total number of hours and days operated in the preceding calendar year. Detailed records are to be maintained in a written bound log or other format approved by the District Director and made available for inspection by Metro Vancouver staff for a minimum period of three years.</td>
<td>Operating Period</td>
</tr>
<tr>
<td>03</td>
<td>August 31, 2021</td>
<td>Every 3 years, on or before August 31 every third year.</td>
<td>A written sampling test plan, including proposed methodologies, shall be submitted for written approval by the District Director prior to commencing sampling.</td>
<td>Information - Other</td>
</tr>
<tr>
<td>03</td>
<td>April 30, 2019</td>
<td>Quarterly, on or before April 30, July 31, October 31 and January 31 of each year.</td>
<td>Submit a report of any incident in which dust is observed exiting the enclosed receiving or load out building. The report shall include the date, time, and duration of the occurrence and any actions taken or planned to resolve the problems.</td>
<td>Information - Other</td>
</tr>
</tbody>
</table>
C. AMENDED OR ADDITIONAL REQUIREMENTS

Based on the results of the monitoring program, including the stack sampling results or any other information, the District Director may:

1. Amend the monitoring and reporting requirement of any of the information required by this Permit including plans, programs and studies.
2. Require additional investigations, tests, surveys or studies.
LEGAL DESCRIPTION OF DISCHARGE SITE: NHB Plan 80-83 fronting lots 100 through 104 and a portion of lots D and E and the north foot of Kaslo Street end Plan 16178 Town of Hastings, NWD.

The following site plan is not to scale and the locations of the discharge points are approximate.