

Updates to the Approvals Process

Presented by:

Derek Sullivan, Special Projects

Approvals Program

Environmental Assessment and Approvals Branch
Ministry of the Environment

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Ontario

Overview

- Application Screening Process
- 4 new ACMEs on the website
- Proposed changes to the existing Comprehensive CofA (Air&Noise) template
- Electronic submission of the Written Summary

Application Screening Process

- Reduce application processing times
- Incomplete applications create more work for the ministry
- Raising the bar for quality
- Incomplete applications will be returned
- We worked hard to eliminate the backlog and we cannot allow another backlog to build

ACME Update

- I have been working with Conestoga-Rovers & Associates on a project to create 6 new sample application packages (ACMEs)
- All six were completed earlier this year
- Four are now posted on the Ministry website
- Two will be used in the Renewable Energy Act approvals as examples

ACME Laboratories (Air and Noise)

- Comprehensive CofA for a materials testing laboratory
 - Testing various products, including; paints, inks, coatings, plastics, etc.
 - Multiple fume hoods
 - Numerous Contaminants - tiered approach to calculate the emissions rates and concentration levels
 - Reg. 346 with Schedule 2 criteria
 - Documented negligible source rationale
 - Completed AAR

ACME Composting (Air and Noise)

- A new sample application package for a composting facility
 - SSO and yard waste composting
 - Speed up request for Schedule 3 criteria
 - Newer USEPA models (AERMOD)
 - Documented negligible source rationale
 - Completed AAR



ACME Wastewater Treatment Plant (Municipal Sewage)

- A new sample application package for a municipal sewage works facility
 - Amendment to existing CofA
 - Addition of a secondary treatment system, odour control, etc.

ACME Metal Mining (Industrial Sewage)

- A new sample application package for a metal mining facility
 - Tailings management
 - Reclamation system
 - Storm water management system

Links to the ACMEs

- They can be found in the following areas of the ministry website:
- Forms, Manuals and Guidelines
 - Air/Certificates of Approvals
 - Water/Water and Sewage Works
- Sample Application Packages for Certificates of Approvals

<http://www.ene.gov.on.ca/en/business/cofa/sample.php>

Existing Comprehensive CofA (Air&Noise)

- Site-wide approval (i.e., all sources and all contaminants)
- Must demonstrate compliance with all applicable POI limits
- Operational flexibility to allow modifications, subject to conditions:
 - Ongoing demonstration of compliance
 - Documentation and notification requirements
 - Limits to flexibility for 5 years, can be renewed

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Existing Comprehensive CofA (Air&Noise)

- Focus is on ongoing demonstration of compliance
- Ability to make modifications to facility and/or processes without obtaining an amendment (within the operational flexibility)
- Ability to plan and make production changes in a timely manner

Existing Comprehensive CofA (Air&Noise)

- Regular business:
 - Guidance materials on website for air & noise applications
 - We have issued approximately 800 Comprehensive CsofA (Air&Noise)
 - An average facility makes 1-2 modifications per year which means 800-1600 applications avoided per year

Proposed Changes to Comprehensive CofA (Air&Noise)

- Minor edits to reflect the changes in O.Reg. 419/05
- Add definitions & conditions to allow the use of Jurisdictional Screening Levels (JSL)
- Increase the renewal frequency from 5 years to 10 years
- Add a condition to require the Annual Written Summaries to be submitted electronically

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Jurisdictional Screening Levels (JSL)

- JSLs are screening criteria (not standards or guidelines) developed by SDB for contaminants without standards or guidelines.
 - If below the JSL, no further assessment is required.
 - If above the JSL, a site specific assessment is required.
- Listed in the Ministry publication titled "*Jurisdictional Screening Level (JSL) List, A Screening Tool for Ontario Regulation 419: Air Pollution - Local Air Quality*", dated February 2008, as amended.
- EAAB worked with SDB to incorporate JSLs into the conditions of the Comprehensive (Air&Noise).
- New definitions and conditions clearly outline the use of JSLs as screening levels

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Increase the Renewal Period

- Renewing every 10 years versus 5 years means less reporting for companies and less review by Ministry
- Annual reporting and on-going record keeping ensures on-going compliance
- Companies are required to keep ESDM current and log all changes - renewals thus far have been routine and simple reviews
- Note: the full 10 years will not be given if there is conflict with a Reg. 419 phase-in date

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Annual Reporting Requirements

- All Comprehensive Cs of A (Air&Noise) contain conditions requiring the company to document ongoing compliance.
- A Written Summary is to be submitted each year.
- New conditions will reduce the reporting burden – not the emitter accountability.
- New conditions require the submission of an electronic “Written Summary Form” instead of the hard copy report.

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Written Summary Form

- The new Written Summary Form is a PDF smart form.
- Built-in logic will indicate if the Form is complete and will create a checklist of documents to be submitted.
- The Written Summary Forms are submitted via email to the Ministry.
- The Written Summary Form is to be used for the current CofA conditions as well.

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Next Steps

- Finalize the new conditions in the Comprehensive CofA
- Start issuing Cs of A using the new conditions in 2011
- The new Written Summary and the associated guidance document will be posted on the website Winter 2010
- Clients will be required to follow the new Written Summary process for their 2010 written summaries due in Spring 2011

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