



PERMIT GVA0004

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:

Polynt Coatings Canada Ltd.
doing business as Polynt Coatings Canada Limited
(the "Permittee")

To Authorize:

the discharge of air contaminants to the air from
a resin and chemical manufacturing plant

Located at:

50 Douglas Street, Port Moody, BC V3H 3L9

Effective Period:

The terms and conditions set out in the Permit apply to the existing or planned works as of
June 19, 2023 and this Permit will expire on October 31, 2028.

All previous versions of this Permit are invalid.

Issued: November 14, 1992
Amended: June 19, 2023


Kathy Preston, Ph.D., P.Eng.
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.

FACILITY WIDE RESTRICTIONS

MAXIMUM EMISSION QUANTITY:

1. 4.1 t/y Total Volatile Organic Compounds (excluding Total Hazardous Air Pollutants)
2. 6 t/y Total Hazardous Air Pollutants

Notwithstanding any other requirement in the Permit, the total discharge of total Volatile Organic Compounds and total Hazardous Air Pollutants are restricted to the maximum emission quantities listed above.

EMISSION SOURCE 06: Various kettles, process tanks, and raw material storage tanks (as described below) discharging through an incinerator stack(s).

MAXIMUM EMISSION FLOW RATE: 50 m³/min

MAXIMUM ANNUAL OPERATING HOURS: 8760 h/y

MAXIMUM PRIMARY BURNER INPUT FIRING RATE: 0 GJ/h

MAXIMUM AFTERBURNER INPUT FIRING RATE: 5.28 GJ/h

MAXIMUM EMISSION QUALITY:

1. 102 mg/m³ Total Hydrocarbon (as Methane) Corrected to 11% oxygen.
2. 50 mg/m³ Particulate Matter
3. 10% Opacity

WORKS AND PROCEDURES:

A "Hirt Combustion Engineering Model HPH-3.7 MX" fume incinerator and related appurtenances must be used to control emissions from the following equipment:

A. Kettles:

- a. Alkyd (including urethane and alkyd-emulsions) resin production: Kettles K-2 & K-4
- b. Latex emulsion resin production: Kettle K-3.

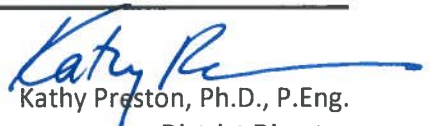
B. Process Tanks:

- a. Alkyd (including urethane and alkyd-emulsions) resin production equipment: Thinning tanks T-2, T-3, T-7 and F-1.

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Permit GVA0004


Kathy Preston, Ph.D., P.Eng.
District Director

METRO VANCOUVER REGIONAL DISTRICT AIR QUALITY MANAGEMENT PERMIT

- b. Latex emulsion resin production equipment: Monomer tanks T-11 and T-12; Cool down tank F-1.

C. Raw material storage tanks:

- a. R-11 (xylene)
- b. R-12 (mineral spirits)
- c. R-20 (vinyl acetate)
- d. R-21 (butyl acrylate)
- e. R-23 (toluene)
- f. R-24 (styrene)
- g. R-26 (TDI)
- h. R-28 (methyl methacrylate)
- i. R-29 (phthalic anhydride)

Pretreatment of emissions from resin kettles K-2 & K-4, and raw material storage tank R-29 emissions must go through a packed tower caustic scrubber and related appurtenances.

The temperatures referred to in Section 1 of this Permit must be continuously monitored and recorded in a conveniently visible location. The Permittee must calibrate this temperature measurement system at the discretion of, and in a manner acceptable to, the District Director.

MINIMUM INCINERATOR EXIT TEMPERATURE: 760 °C

EMISSION SOURCE 17: Fifteen raw material storage tanks, thirty-three intermediate, blending, or finished product storage tanks, two polyester blending tanks, and emissions resulting from use of PCBTF solvent discharging through a Vent(s).

MAXIMUM EMISSION FLOW RATE: **The authorized maximum rate of discharge is that resulting from vapour venting during tank filling and breathing.**

MAXIMUM ANNUAL OPERATING HOURS: **8760 h/y**

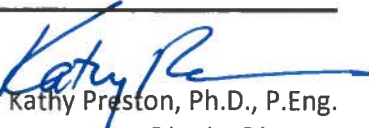
MAXIMUM EMISSION QUANTITY:

The Total Volatile Organic Compound and Total Hazardous Air Pollutant emissions from this source are authorized as part of the Facility Wide restrictions.

WORKS AND PROCEDURES:

Conservation vents for storage tanks containing volatile materials, and related appurtenances together with good operating practices.

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District Director

Permit GVA0004

METRO VANCOUVER REGIONAL DISTRICT AIR QUALITY MANAGEMENT PERMIT

Tanks are divided into four sub-groups depending on their predominant use type:

- A. Raw Material Storage Vessels (15):
 - a. R-5, R-6, R-7, R-8, R-9, R-10, R-13, R-17, R-25, R-27, R-30, R-32, R-33, R-34, T-9
- B. Intermediate, Blending, or Finished Product Storage Tanks (33):
 - a. T-6, T-8, T-10, F-3 to F-15, F-17, F-18, F-21 to F-31, F-34 to F-36, and K-1
- C. Polyester blending Tanks (2):
 - a. T-1 and T-4
- D. p-Chlorobenzo trifluoride (PCBTF) Processing (2):
 - a. Emissions from T-3 and T-7

EMISSION SOURCE 20: Truck, drum, and rail car loading and unloading discharging through a Vent(s).

MAXIMUM EMISSION FLOW RATE: The authorized maximum rate of discharge is that resulting from vapour venting during container filling and breathing.

MAXIMUM ANNUAL OPERATING HOURS: 8760 h/y

MAXIMUM EMISSION QUANTITY:

The Total Volatile Organic Compound and Total Hazardous Air Pollutant emissions from this source are authorized as part of the Facility Wide restrictions.

WORKS AND PROCEDURES:

Good operating practices.

EMISSION SOURCE 21: Wastewater treatment plant discharging via the treatment pond surface.

MAXIMUM EMISSION FLOW RATE: The authorized maximum rate of discharge is that resulting from aeration.

MAXIMUM ANNUAL OPERATING HOURS: 8760 h/y

MAXIMUM EMISSION QUANTITY:

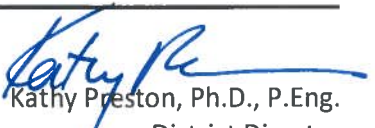
The Total Volatile Organic Compound and Total Hazardous Air Pollutant emissions from this source are authorized as part of the Facility Wide restrictions.

WORKS AND PROCEDURES:

Good operating practices.

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Amended: June 19, 2023


Kathy Preston, Ph.D., P.Eng.
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Permit GVA0004

METRO VANCOUVER REGIONAL DISTRICT AIR QUALITY MANAGEMENT PERMIT

EMISSION SOURCE 22: Quality control laboratory discharging through a Fan Exhaust(s).

MAXIMUM EMISSION FLOW RATE: **100** m³/min
MAXIMUM ANNUAL OPERATING HOURS: **8760** h/y

MAXIMUM EMISSION QUALITY:

1. 5% Opacity

MAXIMUM EMISSION QUANTITY:

The Total Volatile Organic Compound and Total Hazardous Air Pollutant emissions from this source are authorized as part of the Facility Wide restrictions.

WORKS AND PROCEDURES:

Good operating practices. Five fans.

EMISSION SOURCE 24: Cleaver Brooks packaged gas fired boiler discharging through a Stack(s).

MAXIMUM EMISSION FLOW RATE: **50** m³/min
MAXIMUM ANNUAL OPERATING HOURS: **8760** h/y
MAXIMUM PRIMARY BURNER INPUT FIRING RATE: **8.83** GJ/h

MAXIMUM EMISSION QUALITY:

1. 10% Opacity

WORKS AND PROCEDURES:

The firing of the boiler with natural gas using good combustion practices and operating procedures.

EMISSION SOURCE 25: Hot Oil Heater discharging through a Stack(s).

MAXIMUM EMISSION FLOW RATE: **110** m³/min
MAXIMUM ANNUAL OPERATING HOURS: **8760** h/y
MAXIMUM PRIMARY BURNER INPUT FIRING RATE: **11.18** GJ/h

MAXIMUM EMISSION QUALITY:

1. 10% Opacity

WORKS AND PROCEDURES:

The firing of the Sigma Thermal HC2-8.0-H-SF Low NOx Boiler fired with natural gas together with good operating procedures.

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District Director

Permit GVA0004

SECTION 2 – GENERAL REQUIREMENTS AND CONDITIONS

A. POLLUTION NOT PERMITTED

Notwithstanding any conditions in this permit, no person may 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*.

B. AUTHORIZED WORKS, PROCEDURES AND SOURCES

Works and procedures, which this permit authorizes in order to control the discharge of air contaminants, must be employed during all operating periods of the related sources. The Permittee must 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.

C. NOTIFICATION OF MONITORING NON-COMPLIANCE

The District Director must be notified immediately of:

1. 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;
2. Any (a) interruption, (b) damage or (c) interference to any (i) continuous ambient air analyzer, (ii) meteorological sensor or (iii) related equipment required in Section 1 or Section 3 of this permit that would cause the continuous ambient air analyzer or meteorological sensor to be offline for a period greater than 48 hours; and
3. Any exceedance of a Metro Vancouver ambient air quality objective measured by an ambient monitoring station required in Section 1 or Section 3 of this permit.

Notification must be made to Metro Vancouver's 24-hour number: 604-436-6777, or to EREnotifications@metrovancover.org.

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.

Issued: November 14, 1992
Amended: June 19, 2023


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District Director

Permit GVA0004

METRO VANCOUVER REGIONAL DISTRICT AIR QUALITY MANAGEMENT PERMIT

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 must:

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 must be made to Metro Vancouver's 24-hour number: 604-436-6777 or ERNotifications@metrovancover.org; and
3. Take appropriate remedial action for the prevention or mitigation of pollution.

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 must 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

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Permit GVA0004

METRO VANCOUVER REGIONAL DISTRICT AIR QUALITY MANAGEMENT PERMIT

content must not exceed 15 milligrams per kilogram (mg/kg) and emissions during fuel oil firing must 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 (SO_x) are expressed as Sulphur Dioxide.
9. Nitrogen Oxides (NO_x) are expressed as Nitrogen Dioxide.
10. The Canadian Council of Ministers of the Environment (CCME) "Environmental Guidelines for Controlling Emissions of Volatile Organic Compounds from Aboveground Storage Tanks (PN1180)" must 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

Any natural gas-fired heating, ventilation or air conditioning system for buildings and any internal combustion engine located at the discharge site must be maintained and operated in a manner prescribed by the manufacturer to ensure good combustion of the fuel with minimum discharge of air contaminants.

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Permit GVA0004

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 must 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@metrovanancouver.org).

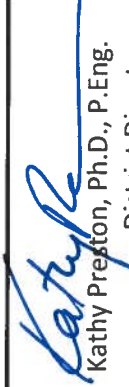
Unless otherwise specified, sampling must be performed under operating conditions representative of or greater than the previous 90 calendar days of operation. All field data and calculations must be submitted with monitoring results and they must be reported in the metric units that are used in this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

Unless otherwise specified or approved in writing by the District Director, stack sampling must not occur more than 120 calendar days prior to the due dates specified below.

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

Issued: November 14, 1992
Amended: June 19, 2023

Permit GVA0004



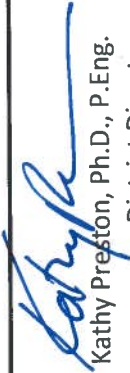
Kathy Preston, Ph.D., P.Eng.
District Director

METRO VANCOUVER REGIONAL DISTRICT AIR QUALITY MANAGEMENT PERMIT

EMISSION SOURCE	INITIAL DUE DATE	SUBSEQUENT DUE DATES	REQUIREMENT	PARAMETER(S)	TEST METHOD	REPORT TYPE/TITLE
06	August 31, 2023	On or before August 31 for each subsequent year.	Submit a written report detailing the measured discharge rate and concentration of particulate matter and total hydrocarbons in the emissions.	Particulate Matter, Total Hydrocarbon (as Methane)	EPA Test Method 5, EPA Test Method 25A	Stack

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Permit GVA0004


 Kathy Preston, Ph.D., P.Eng.
 District Director


METRO VANCOUVER REGIONAL DISTRICT AIR QUALITY MANAGEMENT PERMIT

B. INFORMATION REPORTING REQUIREMENTS

The Permittee must submit electronic reports containing the required information to the District Director by the due dates specified in the following table using a password enabled web based application provided by Metro Vancouver.

EMISSION SOURCE	INITIAL DUE DATE	SUBSEQUENT DUE DATES	REQUIREMENT	REPORT TYPE/TITLE
17	July 31, 2023	Quarterly, on or before April 30, July 31, October 31 and January 31 of each year.	Submit a written report on the condition, inspection frequency, and repairs on all in-line flame arresters, pressure release valves and conservation breather vents on the tanks described in Section 1 of this Permit.	Information - Other
Facility	July 31, 2023	Quarterly, on or before April 30, July 31, October 31 and January 31 of each year.	Submit a written report detailing VOC and HAP losses, based on the previous calendar quarter, from storage tanks, tank truck loading, waste water treatment facilities, and equipment leaks. Calculations for tank emissions must be based on emission factors using the most recent version of the US EPA Storage Tank Emissions Calculations in the 'Tanks' Software or equivalent. For all other sources, emissions calculations must use USEPA Document Volume II: Chapter 8 "Methods for Estimating Air Emissions from Paint, Ink, and Other Coating Manufacturing Facilities" Equation 8.4-3, page 31 of 91, or other equivalent. Calculation methods must be clearly identified. All data inputs to the equations must be reported including storage tank capacity, material stored and the annual throughput for each tank and loading operations.	Fugitive total VOC and total HAP Losses Report
Facility	September 29, 2023	N/A	Submit for review, comment, and written approval by the District Director, an odour and complaint management and communication plan. The plan must include: - Identification of all odour generating areas at the facility including,	Odour and Complaint Management and Communication Plan

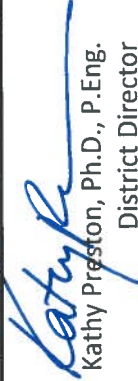
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 Kathy Preston, Ph.D., P.Eng.
 District Director

Permit GVA0004

METRO VANCOUVER REGIONAL DISTRICT AIR QUALITY MANAGEMENT PERMIT

EMISSION SOURCE	INITIAL DUE DATE	SUBSEQUENT DUE DATES	REQUIREMENT	REPORT TYPE/TITLE
			<p>but not limited to the following:</p> <ul style="list-style-type: none"> ● all process kettles, process tanks, raw material tanks as well as all raw storage, intermediate, blending and finished products storage tanks, ● all truck, drum, and rail car loading and unloading operations, ● Wastewater treatment plant and, ● facility wide fugitive emission sources. <p>- Identification (by emission source), of the air contaminants being emitted which are odorous,</p> <p>- Measures taken or proposed to mitigate any off-site odours as well as procedures outlining how public complaints will be handled and documented.</p> <p>The plan also must include a communication plan to inform both local communities and Metro Vancouver if odours are detected beyond the property boundary and what steps are being taken to address the issue(s).</p>	
06, 17, 20, 21, 22, 24, 25	March 31, 2024	On or before March 31 for each subsequent year.	<p>Submit a 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 acceptable to Metro Vancouver staff and made available for inspection by Metro Vancouver staff for a minimum period of three years.</p>	Operating Period
Facility	March 31, 2024	On or before March 31 for each subsequent year.	<p>Submit a written report providing details of the types and amounts of principle products produced and principal raw materials used in the preceding calendar year.</p>	Materials and Products



 Kathy Preston, Ph.D., P.Eng.
 District Director

Issued: November 14, 1992
 Amended: June 19, 2023

Permit GVA0004

METRO VANCOUVER REGIONAL DISTRICT AIR QUALITY MANAGEMENT PERMIT

EMISSION SOURCE	INITIAL DUE DATE	SUBSEQUENT DUE DATES	REQUIREMENT	REPORT TYPE/TITLE
Facility, 24, 25	March 31, 2024	On or before March 31 for each subsequent year.	Submit a written report providing details of the types and amounts of fuel burned in the preceding calendar year.	Fuel Use
Facility	March 31, 2024	On or before March 31 for each subsequent year.	Submit a written report on work underway or proposed to reduce fugitive emissions from plant equipment and operations including valves, seals and flanges in the process area; storage tanks, material transfers and wastewater treatment.	Fugitive Emission Reduction Report
Facility	March 31, 2024	On or before March 31 for each subsequent year.	Submit a written report summarizing all complaints regarding air emissions received by the Permittee for the previous calendar year. All complaints must be submitted along with a summary of any follow-up actions taken or proposed, including lab analysis reports of any collected sample material and analysis of meteorological data. The complaint summary report must adhere to the methodologies and criteria as outlined in the approved Odour and Complaint Management and Communication Plan.	Complaint Summary Report
Facility	September 30, 2024	N/A	Submit a written Technology Assessment Plan to the District Director, for review, comment, and written approval, for assessing control technologies that will reduce VOC and HAP emissions from the facility. The plan must also include an assessment of the current incinerator and its destruction efficiency. The plan must be prepared by a Qualified Professional* and must include, but not be limited to, an assessment of a vapour recovery unit or an incinerator, new or existing, for the following emission sources: a. Storage tanks	Technology Assessment Plan


 Kathy Preston, Ph.D., P.Eng.
 District Director

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 Amended: June 19, 2023

Permit GVA0004

METRO VANCOUVER REGIONAL DISTRICT AIR QUALITY MANAGEMENT PERMIT

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Facility	September 30, 2025	N/A	<p>b. Loading and unloading operations c. Waste water treatment facilities d. Equipment leaks e. Other fugitive emission losses</p> <p>The plan must include but not be limited to the methodologies that will be used to:</p> <ol style="list-style-type: none"> Identify potential control technologies, Quantify emission reductions, Identify environmental and community impacts, Quantify capital and operating costs, Assess the feasibility of implementation, and, Rank the potential control technologies. <p>*As submitted by the permit holder using the most recent versions of the "Qualified Professional Declaration of Competency" and "Qualified Professional Conflict of Interest Disclosure Statement" forms, as available on the Metro Vancouver website.</p>	Technology Assessment Report
			<p>Submit a written Technology Assessment Report prepared by a Qualified Professional* to the District Director for written approval. In addition to reporting the results of the assessment prescribed by the approved Technology Assessment Plan, the report must also include:</p> <ol style="list-style-type: none"> Proposed preferred emission control technology option(s) for each source type; Refined capital and operating costs, 	


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Permit GVA0004

METRO VANCOUVER REGIONAL DISTRICT AIR QUALITY MANAGEMENT PERMIT

EMISSION SOURCE	INITIAL DUE DATE	SUBSEQUENT DUE DATES	REQUIREMENT	REPORT TYPE/TITLE
			<p>c. Proposed emission limits based on implementing the preferred technology or technologies, and</p> <p>d. Implementation schedule.</p> <p>*As submitted by the permit holder using the most recent versions of the "Qualified Professional Declaration of Competency" and "Qualified Professional Conflict of Interest Disclosure Statement" forms, as available on the Metro Vancouver website.</p>	

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.

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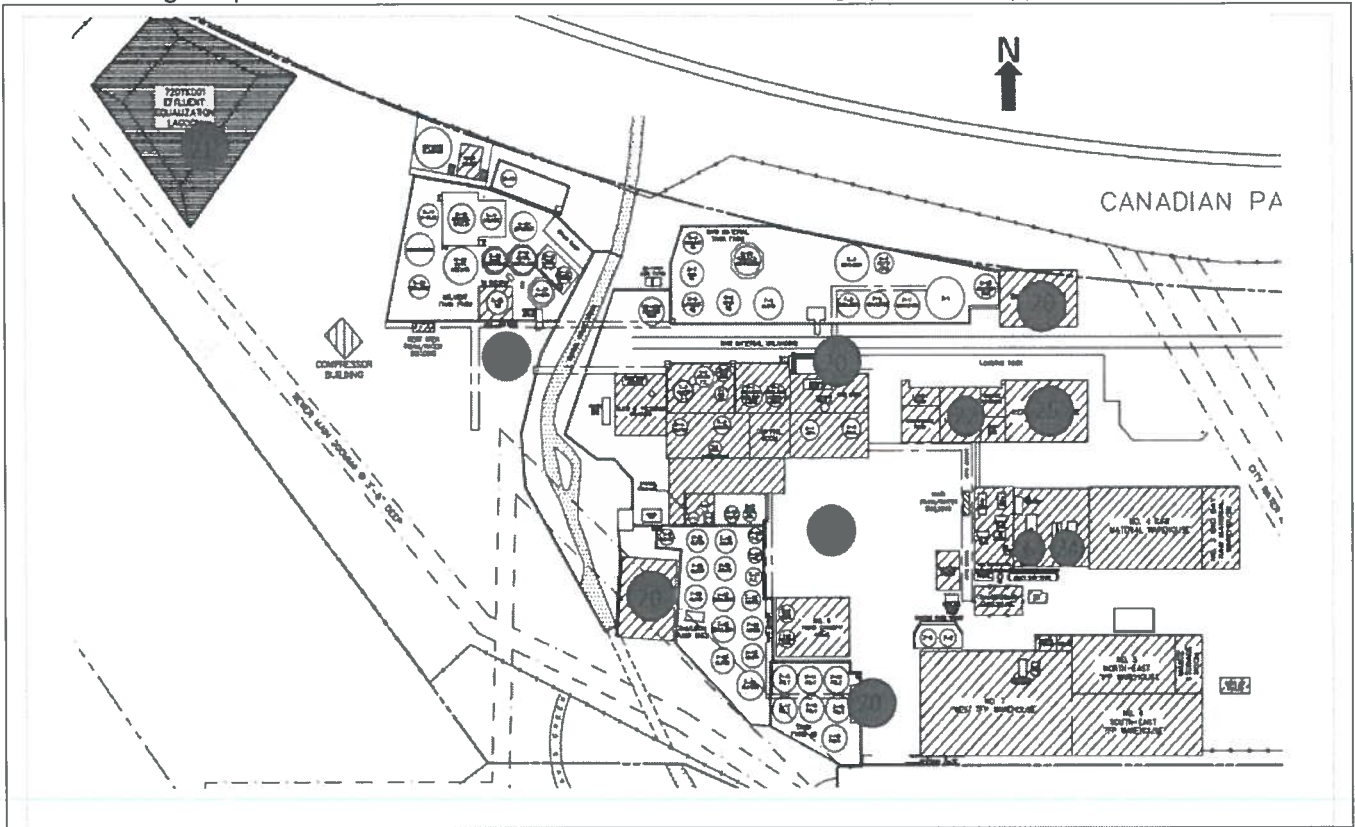
Permit GVA0004

METRO VANCOUVER REGIONAL DISTRICT AIR QUALITY MANAGEMENT PERMIT

SECTION 4 – SITE PLAN

LEGAL DESCRIPTION OF DISCHARGE SITE: City of Port Moody Parcel Identifier: 003-802-591, Lot 81 of District Lot 202, Group 1, New Westminster District Plan 27800; City of Port Moody Parcel Identifier: 003-802-647, Lot "B" Except: Part Subdivided By Plan 43464, District Lot 202, Group 1, New Westminster District Plan 20953; City of Port Moody Parcel Identifier: 003-802-825, Lot 82 Except: Part Subdivided By Plan 43428, District Lot 202, Group 1, New Westminster District Plan 30084.

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



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