

PERMIT GVA0051

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:

CIPA Lumber Co. Ltd.
(the "Permittee")

To Authorize:

the discharge of air contaminants to the air from
a softwood veneer manufacturing and drying facility

Located at:

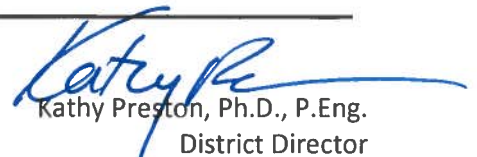
797 Carlisle Road, Delta, BC V3M 5P4

Effective Period:

The terms and conditions set out in the Permit apply to the existing or planned works as of
March 15, 2023 and this Permit will expire on January 31, 2031.

All previous versions of this Permit are invalid.

Issued: November 30, 1992
Amended: March 15, 2023


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

METRO VANCOUVER REGIONAL DISTRICT AIR QUALITY MANAGEMENT PERMIT

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 14: Veneer transfer associated with primary round-up lathe discharging through a Cyclone Exhaust(s).

MAXIMUM EMISSION FLOW RATE: **1000** m³/min
MAXIMUM ANNUAL OPERATING HOURS: **8760** h/y

MAXIMUM EMISSION QUALITY:

1. 20 mg/m³ Particulate Matter
2. 10% Opacity

WORKS AND PROCEDURES:

Two cyclones (east & west) and related appurtenances, together with good operating practices.

EMISSION SOURCE 15: No. 3 and no. 5 veneer dryers, and no. 4 veneer dryer outfeed seal section discharging through a Stack(s).

MAXIMUM EMISSION FLOW RATE: **3000** m³/min
MAXIMUM ANNUAL OPERATING HOURS: **8760** h/y
MAXIMUM PRIMARY BURNER INPUT FIRING RATE: **126.78** GJ/h

EFFECTIVE UPON PERMIT ISSUANCE AND UNTIL JANUARY 31, 2030 ONLY:

MAXIMUM EMISSION QUANTITY:

1. 200 t/y Methane
2. 15 t/y Sulphur Oxides
3. 300 t/y Total Volatile Organic Compounds

MAXIMUM EMISSION QUALITY:

1. 45 mg/m³ Particulate Matter
2. 5% Opacity
3. Particulate Matter: Includes condensible particulate matter (CPM) emissions.

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EFFECTIVE FEBRUARY 01, 2030:

MAXIMUM EMISSION QUALITY:

1. 16 mg/m³ Particulate Matter
2. 80 mg/m³ Total Volatile Organic Compounds (as Methane)
3. 8 mg/m³ Sulphur Oxides
4. 5% Opacity
5. Particulate Matter: Includes condensible particulate matter (CPM) emissions.

WORKS AND PROCEDURES:

Additional or replacement control works sufficient for ES15 emissions to not exceed the Maximum Emission Quality concentration and other limits effective February 01, 2030.

A.H Lundberg Systems Limited wet electrostatic precipitator (WESP Model 1013-300 2TR E-tube, control efficiency 90%) and related appurtenances together with good operating practices.

The firing of the No. 3 veneer dryer (Raute veneer dryer) with natural gas (propane standby), at a maximum firing rate of 59.08 GJ/h, using low-NOx line burners [Maxon Model No. 6-BI-XF-STR-SPL (6 burners) and Model No. 5-BI-XF-STR-SPL (6 burners)] and related appurtenances together with good combustion practices and operating procedures.

The firing of the No. 5 veneer dryer (Taihei veneer dryer) with natural gas (propane standby), at a maximum firing rate of 64.5 GJ/h, using 19 Maxon Crossfire low-NOx line burners with SMARTLINK MRV flow control valves and related appurtenances together with good combustion practices and operating procedures.

The firing of the outfeed seal section of No. 4 veneer dryer with natural gas (propane standby), at a maximum firing rate of 3.2 GJ/h, using 1 Maxon Crossfire low-NOx line burner and related appurtenances together with good combustion practices and operating procedures.

The Permittee must continuously monitor and record baseline operating parameters for the WESP. The minimum operating parameters to be monitored and recorded must include quench inlet temperature, outlet temperature, transformer voltage, transformer amperage and spark rate. Records must be kept and maintained per Section 2 of this Permit.

Stack Information:

Height above ground level: 17.17 m
Inside diameter at stack top: 2.13 m
Minimum exit temperature: 82°C
Exit velocity: 13 m/s

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EMISSION SOURCE 17: Dust collection system Filter Bags.

MAXIMUM EMISSION FLOW RATE: **500** m³/min
MAXIMUM ANNUAL OPERATING HOURS: **8760** h/y

MAXIMUM EMISSION QUALITY:

1. 5% Opacity

WORKS AND PROCEDURES:

Good operating practices.

EMISSION SOURCE 18: No. 4 veneer dryer except outfeed seal section discharging through a Stack(s).

MAXIMUM EMISSION FLOW RATE: **1000** m³/min
MAXIMUM ANNUAL OPERATING HOURS: **8760** h/y
MAXIMUM PRIMARY BURNER INPUT FIRING RATE: **73.61** GJ/h
MAXIMUM AFTERBURNER INPUT FIRING RATE: **2.45** GJ/h

MAXIMUM EMISSION QUALITY:

1. 8 mg/m³ Sulphur Oxides
2. 80 mg/m³ Total Volatile Organic Compounds (as methane)
3. 16 mg/m³ Particulate Matter
4. 5% Opacity

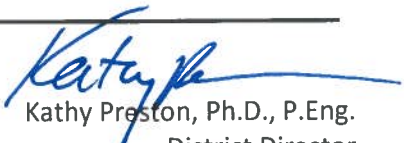
WORKS AND PROCEDURES:

A. H. Lundberg Systems Limited regenerative thermal oxidizer (RTO), will treat No. 4 veneer dryer (Grenzebach veneer dryer) exhaust. Volatile organic compounds and particulate matter must be thermally destroyed in the combustion chamber at minimum 800°C for a minimum of 0.75 seconds.

The firing of the No. 4 veneer dryer with natural gas (propane standby), at a maximum firing rate of 73.6 GJ/h (76.80 GJ/h less 3.2 GJ/h for the outfeed seal section ducted to the WESP ES15), using 22 Maxon Crossfire low-NOx line burners and related appurtenances together with good combustion practices and operating procedures.

Permittee must continuously monitor and record baseline operating parameters for the RTO. The minimum operating parameters to be monitored and recorded must include the firing chamber temperature, RTO outlet temperature. Records must be kept and maintained per Section 2 of this Permit.

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Stack Information:

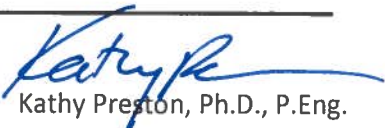
Height above ground level: 20 m

Inside diameter at stack top: 1.27 m

Exit velocity: 15 m/s

MINIMUM INCINERATOR EXIT TEMPERATURE: **222 °C**

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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:

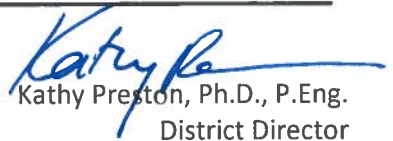
1. Any emission monitoring results, whether from a continuous emissions monitor or periodic testing, which exceed the quantity or quality authorized in Section 1 of this permit;
2. Any (a) interruption, (b) damage or (c) interference to any (i) continuous ambient air analyzer, (ii) meteorological sensor 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.

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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@metrovanouver.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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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.

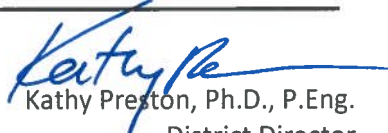
H. RECORDS RETENTION

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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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.

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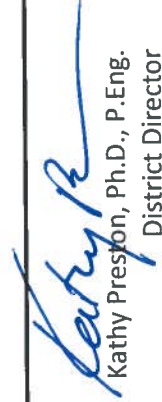
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EMISSION SOURCE	INITIAL DUE DATE	SUBSEQUENT DUE DATES	REQUIREMENT	PARAMETER(S)	TEST METHOD	REPORT TYPE/TITLE
15, 18	September 30, 2023	On or before September 30 for each subsequent year.	<p>Submit a written report detailing the measured discharge rate and concentration of particulate matter including condensible particulate matter, extractible by hexane, nitrogen oxides, sulphur oxides, methane and volatile organic compounds in the emissions. The report must also detail the operating conditions including type of veneer being dried, production rates for individual veneer dryers (including normal or typical production rates) together with details of the WESP and RTO operational parameters recorded during the stack test.</p> <p>Requests for approval of alternative test protocols must include rationale and must be submitted at least 60 days prior to conducting the stack test.</p>	Nitrogen Oxides, Particulate Matter, Total Volatile Organic Compounds, Methane, Combustion Condensibles, Particulate Matter, Sulphur Oxides, Combustion Volatile Organic Compound	Metro Vancouver AQ02/02/1.00M, EPA Test Method 7E, EPA Test Method CTM-042, EPA Test Method 202, EPA Test Method 6C, EPA Test Method 25, EPA Test Method 25A	Stack


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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
15	March 31, 2023	On or before March 31 for each subsequent year.	Submit a written report summarizing the inspection and maintenance program conducted during the previous calendar year on the wet electrostatic precipitator (WESP).	WESP Inspection and Maintenance Report
Facility	March 31, 2023	On or before March 31 for each subsequent year.	Submit a written report detailing the types and amounts of fuel burned in the preceding calendar year.	Information - Other
14, 15, 18, 17	March 31, 2023	On or before March 31 for each subsequent year.	Submit a written report providing details of the total number of hours and days operated in the preceding calendar year.	Fuel Use
17	March 31, 2023	On or before March 31 for each subsequent year.	Submit a written report indicating inspection frequency, bag condition and action taken or proposed to solve any problems detected for the baghouse.	Operating Period
18	April 30, 2023	N/A	Submit for written approval from the District Director, a volatile organic compound Destruction and Removal Efficiency test plan, including proposed methodology and test protocols, prepared by or endorsed by a qualified professional.	Baghouse
				Destruction and Removal Efficiency Test Plan
				Information - Other

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EMISSION SOURCE	INITIAL DUE DATE	SUBSEQUENT DUE DATES	REQUIREMENT	REPORT TYPE/TITLE
18	September 30, 2023	N/A	Submit for written acceptance from Metro Vancouver staff, a plan outlining a proposed annual RTO exit temperature verification and calibration procedure, and annual RTO maintenance procedures including but not limited to bake-out and/or wash-out frequency and condensate mitigation.	RTO Temperature Verification, Calibration, and Maintenance Plan Information - Other
18	September 30, 2023	N/A	Submit for written approval from the District Director, a written report, as per an approved Destruction and Removal Efficiency Test Plan, that includes all consultant and laboratory reports and describes the volatile organic compound destruction and removal efficiency (DRE) of the RTO. This report must be prepared by or endorsed by a qualified professional. The report must also detail the operating conditions including type of veneer being dried, production rates for no. 4 veneer dryer (including normal or typical production rates) together with details of the RTO operational parameters recorded during the stack testing.	Destruction and Removal Efficiency Report Information - Other
18	March 31, 2024	On or before March 31 for each subsequent year.	Submit a written report, as per an approved regenerative thermal oxidizer (RTO) Temperature Verification, Calibration, and Maintenance Plan, summarizing the inspection and maintenance program conducted during the previous calendar year on the RTO. The report must include a summary of the calibration measurements, conducted by an independent consultant in accordance with vendor specified procedures, and any maintenance actions taken on the RTO in the previous	RTO Calibration Summary, Temperature Verification and Maintenance Report


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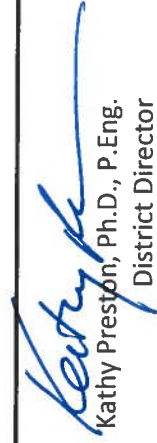
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EMISSION SOURCE	INITIAL DUE DATE	SUBSEQUENT DUE DATES	REQUIREMENT	REPORT TYPE/TITLE
Facility	January 31, 2025	N/A	<p>calendar year. Alternate methods must receive prior written approval from the District Director.</p> <p>Submit for written approval from the District Director, a dispersion modelling plan. The plan must be developed by a Qualified Professional*, using the most recent version of the British Columbia Air Quality Dispersion Modelling Guideline and the most recent version of the Metro Vancouver dispersion model plan template.</p> <p>The plan must include emissions of Nitrogen Oxides (NOx), Sulphur Oxides (SOx), Volatile Organic Compounds (VOCs) and Fine Particulate Matter (PM2.5) based on concentration limits effective as of February 01, 2030.</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>	Information - Other
				Dispersion Model Plan

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Facility	April 30, 2025	N/A	<p>Submit for written approval from the District Director, a written plan prepared by a Qualified Professional*, for assessing control technologies that will reduce emissions from the facility and achieve concentration and other limits as required by February 01, 2030.</p> <p>The plan must include an outline or annotated table of contents for the Control Technology Review Report and must also include methodologies that will be used to:</p> <ul 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>	Control Technology Review Plan Information - Other



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EMISSION SOURCE	INITIAL DUE DATE	SUBSEQUENT DUE DATES	REQUIREMENT	REPORT TYPE/TITLE
Facility	January 31, 2026	N/A	<p>Submit for written approval from the District Director, a written report of the results of a dispersion modelling assessment of the potential cumulative impacts of air contaminant emissions from the facility. Modelling must be conducted by a Qualified Professional*, in accordance with a dispersion model plan approved by the District Director and the most recent version of the British Columbia Air Quality Dispersion Modelling Guideline.</p> <p>The report must include an assessment of emissions of Nitrogen Oxides (NOx), Sulphur Oxides (SOx), Volatile Organic Compounds (VOCs) and Fine Particulate Matter (PM2.5) based on concentration limits effective as of February 01, 2030, and modelled with stack and emission parameters needed to achieve the February 01, 2030 concentration limits.</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>	Dispersion Model Report

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Facility	April 30, 2026	N/A	<p>Submit for written approval from the District Director, a written report prepared by a Qualified Professional*, which includes:</p> <ul style="list-style-type: none"> - the steps the Permittee will take to reduce facility wide authorized VOC and PM emissions from the WESP to achieve concentration and other limits as required by February 01, 2030, - an analysis of the preferred technology's impacts on other emissions (e.g. combustion), - dispersion modelling results of the concentration limits required by February 01, 2030 or alternate proposed limits and proposed technologies, and - a plan to implement the preferred technology by February 01, 2030. <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>	Control Technology Review

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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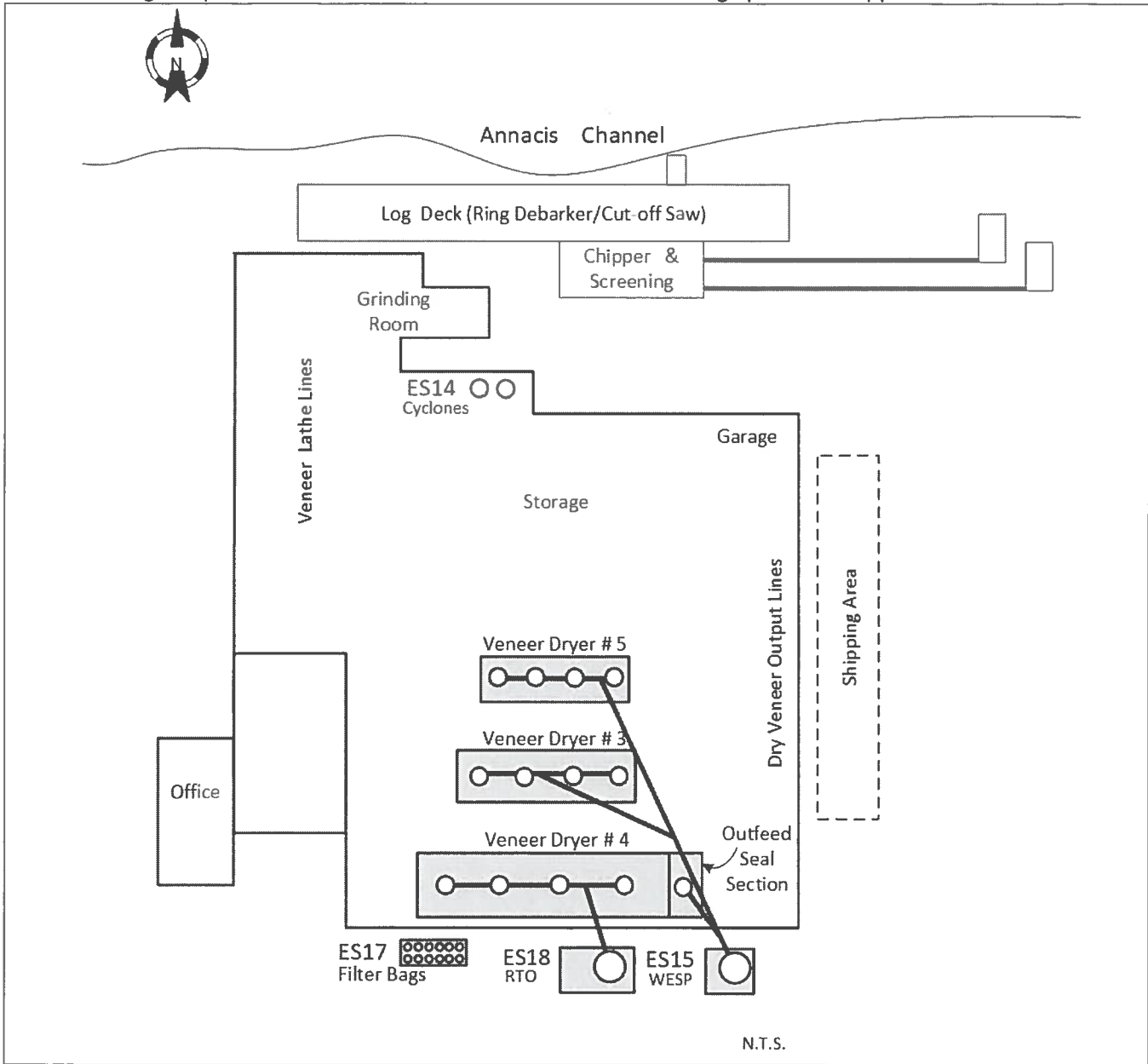
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SECTION 4 – SITE PLAN

LEGAL DESCRIPTION OF DISCHARGE SITE: The Municipality of Delta, PID: 009-141-626, Lot 21, District Lot 312, Group 1, New Westminster District, Plan 29905

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



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