

September 25, 2024

File: AQ-10-01-0294

**REGISTERED**

Imperial Oil Limited  
1 - 2225 loco Road  
Port Moody, BC V3H 3C8

[REDACTED]

Attention: [REDACTED]

Dear [REDACTED]

**Amendment of Permit GVA0294 for ES34T**

Permit No. GVA0294, issued to Imperial Oil Limited, authorizes the discharge of air contaminants from a petroleum product storage and distribution terminal facility. The permit also specifies works and procedures that must be employed.

I have reviewed your August 26, 2024 request to take tank 311 out of service and return tank 312 to service, associated with emission source 34T (All storage tanks with fixed roof).

The Works and Procedures for Emission Source 34T (All storage tanks with fixed roof) is hereby amended, as listed in the table below:

Emission Source	Works & Procedures	Effective Date Start
34T – All storage tanks with fixed roof discharging through fixed roof tank vents	Tanks 304, 305, 306A, 308, 309 and 312. Above ground storage tanks with fixed roofs and tank vents, utilizing good operating practices. The vapour pressure of materials stored in these tanks shall not exceed 10 kPa.  Tanks 311, 335, 368, 108, 121 are currently not in service.	October 14, 2024

No petroleum products can be stored in Tank 312 until repairs required to meet API Standard 653 Tank Inspection, Repair, Alteration, and Reconstruction are complete. No petroleum products can

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be stored in Tank 311 after November 22, 2024. All other conditions of Permit GVA0294 remain in effect.

**Applicability of Other Enactments and Legislation**

It is the responsibility of the Permittee to ensure that all activities conducted pursuant to this Permit are carried out with due regard to the rights of third parties and are in compliance with other applicable enactments that may be in force.

**Appeals**

This Permit may be appealed by persons who consider themselves aggrieved by this decision in accordance with Part 8 of the provincial *Environmental Management Act*. Written notices of appeal must be received by the Environmental Appeal Board within thirty (30) days.

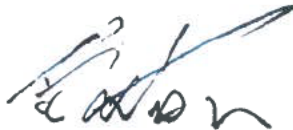
**Related Information and Documentation**

Information regarding Metro Vancouver’s air quality regulatory program is available by searching for “air quality regulatory program” at [metrovancover.org](http://metrovancover.org) or by calling 604-432-6200.

Should there be a conflict between the information provided in this letter and GVRD Air Quality Management Bylaw Permit GVA0294, the latter will prevail.

If you have any questions, please contact Joanne Ramirez at 778-452-2630 or at [joanne.ramirez@metrovancover.org](mailto:joanne.ramirez@metrovancover.org).

Sincerely,



Julie Saxton, Ph.D., P.Chem.  
Assistant District Director  
Metro Vancouver Regional District

JES/KEP/jmr

cc: [REDACTED]



## PERMIT GVA0294

**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:**

Imperial Oil Limited  
(the "Permittee")

**To Authorize:**

the discharge of air contaminants to the air from  
a petroleum product storage and distribution terminal  
(the "Facility")

**Located at:**

#1 - 2225 Ioco Road, Port Moody, BC V3H 3C8


**Effective Period:**

The terms and conditions set out in the Permit apply to the existing or planned works as of  
December 20, 2016 and this permit will expire on January 15, 2032.

All previous versions of this Permit are hereby rescinded and rendered null and void.

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Issued: November 30, 1992  
Amended: December 20, 2016

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

**GREATER 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 33T: All storage tanks with floating roof discharging through Floating roof tank seals.**

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

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

**WORKS AND PROCEDURES:**

Above ground storage tanks with floating roofs equipped with primary seals maintained in good repair, together with good operating practices. The vapour pressure of materials stored in these tanks shall not exceed 10 kPa.

All floating roof tanks are currently not in service.

364- external floating roof

361 - internal floating roof

363- internal floating roof

**EMISSION SOURCE 34T: All storage tanks with fixed roof discharging through fixed roof tank vents.**

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

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

**WORKS AND PROCEDURES:**


Tanks 304, 305, 306A, 308, 309 and 311. Above ground storage tanks with fixed roofs and tank vents, utilizing good operating practices. The vapour pressure of materials stored in these tanks shall not exceed 10 kPa.

Tanks 312, 335, 368, 108, 121 are currently not in service

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**GREATER VANCOUVER REGIONAL DISTRICT AIR QUALITY MANAGEMENT PERMIT**

**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 modification 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@metrovancover.org](mailto:regulationenforcement@metrovancover.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

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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 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% O<sub>2</sub> for natural gas and fuel oil; or
  - 8% O<sub>2</sub> 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 provincial "Source Testing Code for the Visual Measurement 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 (SO<sub>x</sub>) are expressed as Sulphur Dioxide.

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9. Nitrogen Oxides (NO<sub>x</sub>) 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 (June 1995, CCME-EPC-87E)" 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**

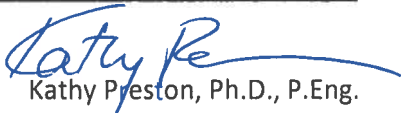
All records and supporting documentation relating to this permit must be kept for at least three years after the date of preparation or receipt thereof, and be made available for inspection within 48 hours of a request by an Officer.

### **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.

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**GREATER VANCOUVER REGIONAL DISTRICT AIR QUALITY MANAGEMENT PERMIT**

**SECTION 3 – REPORTING REQUIREMENTS**

**A. MONITORING REQUIREMENTS AND REPORTING**


Unless otherwise approved 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 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@metrovancover.org](mailto:regulationenforcement@metrovancover.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.

EMISSION SOURCE	INITIAL DUE DATE	SUBSEQUENT DUE DATES	REQUIREMENT	PARAMETER(S)	TEST METHOD	REPORT TYPE
N/A	N/A	N/A	N/A	N/A	N/A	N/A

  
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**GREATER VANCOUVER REGIONAL DISTRICT AIR QUALITY MANAGEMENT PERMIT**

**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.

<b>EMISSION SOURCE</b>	<b>INITIAL DUE DATE</b>	<b>SUBSEQUENT DUE DATES</b>	<b>REQUIREMENT</b>	<b>REPORT TYPE</b>
33T	March 31, 2017	On or before March 31 for each subsequent year.	Written report detailing hydrocarbon losses, based on the previous calendar year, from storage, loading and handling operations. Calculations shall be based on Emission Factors using the most recent version of the US EPA Storage Tank Emissions Calculations in the "Tanks" Software or equivalent. All data inputs to the equations shall be reported including the storage tank capacity, material stored and the annual throughput for each tank and loading operation. Only tanks in active service for all or part of the previous year need be included.  Hydrocarbon loss estimates shall be based on standard API methods for each tank.	Floating Roof Petroleum Storage Tank (T2)
Facility	March 31, 2017	On or before March 31 for each subsequent year.	Written report detailing the types and amounts of fuel burned in the preceding calendar year.	Fuel Use
33T	March 31, 2017	On or before March 31 for each subsequent year.	Written report due on the condition of all floating roof tank seals, and all conservation vents associated with the tanks. All evidence of seal and vent deterioration and/or malfunction shall be reported, as well as all action taken or proposed to resolve any seal or venting problems. Only those tanks in active service for all or part of the previous year need be included.	Information - Other

  
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EMISSION SOURCE	INITIAL DUE DATE	SUBSEQUENT DUE DATES	REQUIREMENT	REPORT TYPE
33T, 34T	March 31, 2017	On or before March 31 for each subsequent year.	<p>Written progress reports on the status of the program for upgrading the seals on existing tanks, removal of old tanks and construction of new tanks described in Section 1 of this permit. Each report shall summarize all actions taken and planned for the tanks.</p> <p>Written report detailing the storage tank capacity, the material stored and the annual throughput for each tank for the preceding calendar year. The report should also include annual throughput of material transported by marine vessels and rail cars.</p>	Information - Other
34T	March 31, 2017	On or before March 31 for each subsequent year.	<p>Written report detailing hydrocarbon losses, based on the previous calendar year, from storage, loading and handling operations. Calculations shall be based on Emission Factors using the most recent version of the US EPA Storage Tank Emissions Calculations in the "Tanks" Software or equivalent. All data inputs to the equations shall be reported including the storage tank capacity, material stored and the annual throughput for each tank and loading operation. Only tanks in active service for all or part of the previous year need be included.</p> <p>Hydrocarbon loss estimates shall be based on standard API methods for each tank.</p>	Fixed Roof Petroleum Storage Tank (T1)

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**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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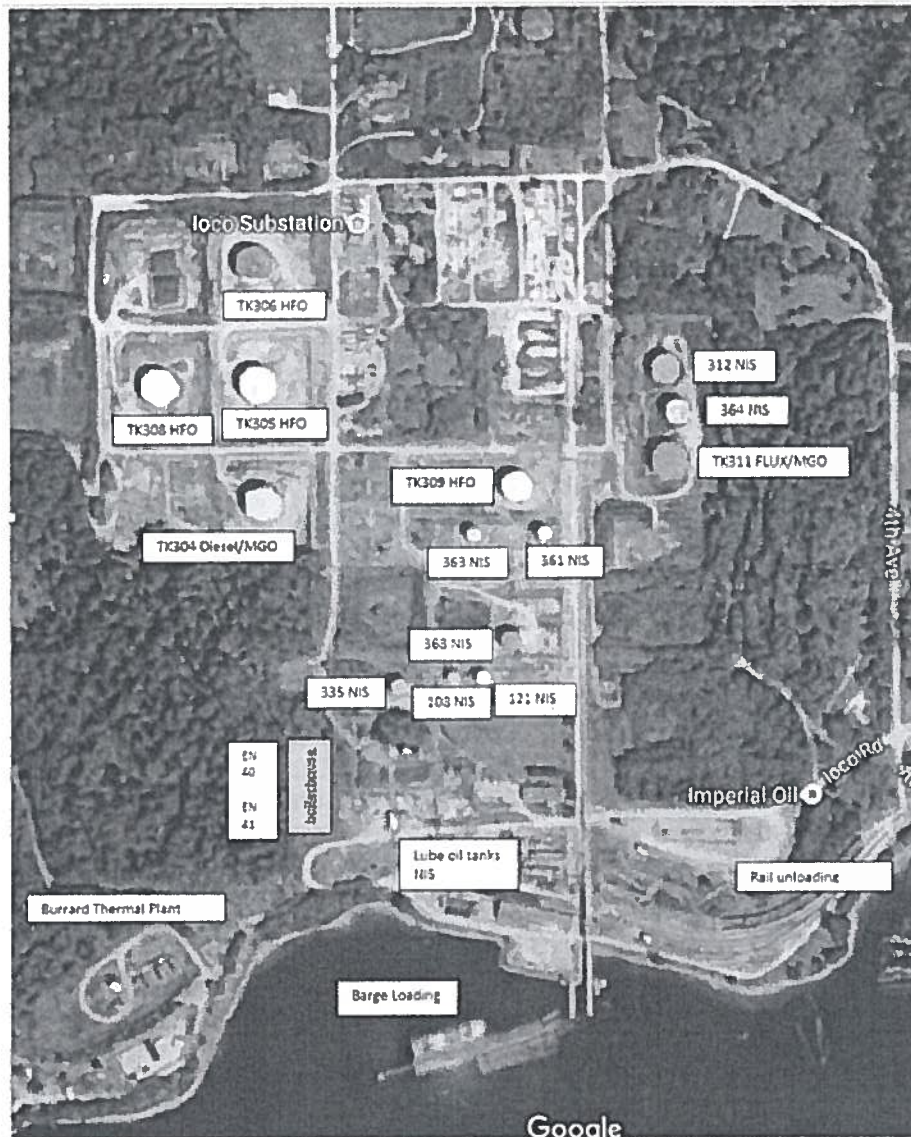
  
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**SECTION 4 – SITE PLAN**

LEGAL DESCRIPTION OF DISCHARGE SITE: Parcel D, District Lot 256, Group 1, New Westminster Land District, Fronting Portions of District of Port Moody; LID 1-03-00090, Lease/Permit/Licence # PT106-10012F-001

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



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*Kathy Preston*  
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