



RE: Whitehorse Thermal Facilities

From Jennifer.Dagg@gov.yk.ca <Jennifer.Dagg@gov.yk.ca>

Date Fri 8/22/2014 11:29 AM

To Travis Ritchie <Travis.Ritchie@yec.yk.ca>

Hi Travis,

Yes I am in the process of receiving and reviewing the Dawson, Mayo and Faro applications. As discussed earlier, if there are no substantial changes to the facilities than our comments will be minimal.

Yes, I can confirm that the recent YESAA assessment for the Whitehorse Facility has provided adequate information to proceed with the permit amendment upon commissioning of the plant or Dec 31st of this year, whichever is sooner.

Please let me know if you have any questions.

Thanks

Jennifer

From: Travis Ritchie [mailto:Travis.Ritchie@yec.yk.ca]

Sent: Wednesday, August 20, 2014 12:13 PM

To: Jennifer.Dagg

Subject: Whitehorse Thermal Facilities

Hi Jennifer,

You may have noticed that I have submitted the project proposals for the Dawson City, Faro, and Mayo diesel plants to the relevant YESAB DOs. Those assessments should be underway shortly.

On a related matter I just wanted to confirm with you that the recent Ex. Comm. Screening and YG Decision Document regarding the expansion of the Whitehorse thermal generation facilities are suitable to allow for renewal of the Whitehorse air emissions part of the permit. It was, of course, our expectation that the recent assessment would allow for the permit amendment/renewal for the Whitehorse plant, but I just wanted to confirm that this is the case from YG's perspective and that no additional assessment is necessary to make the necessary amendments and renew the permit for Whitehorse.

Thanks for your time.

Regards,

Travis

Travis Ritchie, P.Biol., EP

Manager - Environment, Assessment, & Licensing

Yukon Energy Corporation

Ph: (867) 393-5350



Yukon Environmental & Socio-economic Assessment Act

Decision Document

This document meets the Yukon government's requirements as a Decision Body as set out in the *Yukon Environmental & Socio-economic Assessment Act*.

Other Decision Bodies

Not Applicable

Project

Project Name Air Emissions Permit Renewal - Faro Diesel Generator System **YESAB File Number** 2014-0119

Proponent Name Travis Ritchie

Company Name Yukon Energy Corporation

Project Description

The principal activity is the continued operation of two diesel generators (FD1 and FD7) located in the Faro generating plant near the entrance to Faro off the mine access road. The temporal scope of the assessment is for 10 years.

Other Decision Bodies

Consolidated Decision Document Not Applicable

First Nations Consultation

A. Consultation under YESAA section 74(2) Yes – Kaska Dena Council and Ross River Dena Council were asked to identify any concerns with the recommendation. No concerns were identified.

B. First Nations Consultation - General

The project occurs in the traditional territory of the Kaska Dena Council and the Ross River Dena Council. The first nations did not provide comments during the Seeking Views phase of the assessment. No impacts on traditional rights have been identified.

Assessment Outcome

Under s.56(1)(a) of the Yukon Environmental and Socio-economic Assessment Act the Watson Lake Designated Office recommends to the decision boy that the Project be allowed to proceed, as it determined that the project will not have significant adverse environmental and socio-economic effects in or outside Yukon.

Yukon Environmental & Socio-economic Assessment Act

Decision Document

Decision

Pursuant to section 75, 76 and 80, the Yukon government has considered the assessment of this project and:

- Accepts the recommendation and the terms and conditions as follows:
- Rejects the recommendation and the terms and conditions as follows for the reason(s) specified:
- Varies the recommendation and the terms and conditions as follows for the reason(s) specified:

Rationale for Decision

Environment Yukon agrees with the recommendation. The terms and conditions of the Air Emissions permit for this facility are adequate to mitigate potential environmental and socio-economic impacts.

Terms & Conditions have not been added to this project.

Date

Project Recommendation Issued 2014-09-17

Recommendation Received From

Designated Office – Watson Lake

Authority

By signing below, the Yukon government has exercised its authority as per YESAA s.75 or s.76 to issue a decision document on this project.

Name Eric Schroff

Position Acting Director, Environmental Programs

Phone 667-5683

Email eric.schroff@gov.yk.ca

Signature

Date



October 17, 2014

Original signed by Environment

Distribution

Project Proponent	Yes
Other Decision Bodies	No
DAP Branch, Executive Council Office	Yes
YESAB Designated Office	Yes
YESAB Executive Committee	No
Minister Environment (Canada)	No
Yukon Surface Rights Board	No
Yukon Water Board	No
Land Use Planning Commission	No
Independent Regulatory Agency	No
Other Body/Person as Required	No



Permit No: 60-010

AIR EMISSIONS PERMIT

Issued Pursuant to
the *Environment Act* and the *Air Emissions Regulations*

Permittee: Yukon Energy Corporation

Mailing Address: Box 5920, Whitehorse, Yukon, Y1A 6S7

Site Locations: Generating Plants at:

- Dawson
- Faro
- Mayo
- Whitehorse

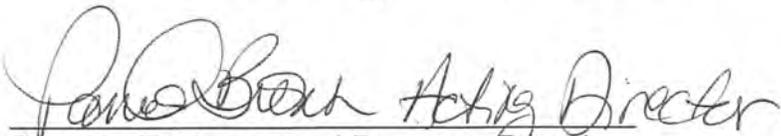
Authorized Representative: Travis Ritchie
Phone/Fax: (867) 393-5350 / (867) 393-5322
Email: travis.ritchie@yec.yk.ca

Effective Date: Date of directors signature

Expiry Date: December 31, 2024

Scope of Authorization: In accordance with your application, you are authorized to operate electricity generating equipment at the above site locations (the "site(s)"), as set out in the terms and conditions of this permit.

Dated this 29 day of December, 2014


Director, Environmental Programs Branch
Environment Yukon

DEPARTMENT OF ENVIRONMENT
ENVIRONMENTAL PROGRAMS
Whitehorse, Yukon
Certified true copy of original
Date: 29 Dec 14 Initials: JRM

PART 1. DEFINITIONS

1. In this permit,

“Act” means the *Environment Act*, R.S.Y. 2002, c. 76, as updated from time to time;

“approved plan” means a plan that is submitted by the permittee and approved by an environmental protection analyst under this permit and includes any terms and conditions specified by the environmental protection analyst in the approval;

“area of influence” refers to that area as determined in the Permittee’s air dispersion modelling submitted to the Branch in 2011 for Whitehorse and in 2012 for Dawson City;

“associated personnel” means all employees, contractors and volunteers involved in the permitted activities;

“Branch” means the Environmental Programs Branch, Environment Yukon;

“emission factor” means the mass emission of a pollutant per unit of energy produced in either grams per kilowatt-hour (g/kWh) or kilograms per megawatt-hour (kg/MWh);

“emission rate” means the average rate in grams per second (g/s) or kilograms/hour (kg/h) at which a pollutant is emitted from a source, determined either:

- i) as estimated based on emission factors derived from published literature regarding sources of similar type and age (estimated emission rates); or
- ii) as derived from measured data obtained from manual stack testing carried out by the permittee (measured emission rates);

“environmental protection analyst” means an employee of the Branch so designated by the Minister of Environment under the Act;

“environmental protection officer” means an employee of the Government of Yukon so designated by the Minister of Environment under the Act;

“Regulations” means the *Air Emissions Regulations*, O.I.C. 1998/207;

“source” means a fuel-fired electricity generator which has a maximum nameplate capacity equal to or more than 1.0 megavolt-ampere;

“total annual emissions” means the emissions derived by multiplying emission factors or measured emission rates for each source by the previous three-year average total energy production for that source.

2. Any term not defined in this permit that is defined in the Act or the Regulations has the same meaning as in the Act or the Regulations.

PART 2: GENERAL

1. No condition of this permit limits the applicability of any other law or bylaw.

2. The permittee shall ensure that all activities authorized by this permit occur on property that the permittee has the right to enter upon and use for that purpose.

DEPARTMENT OF ENVIRONMENT
ENVIRONMENTAL PROGRAMS
Whitehorse, Yukon
Certified true copy of original
Date: 29 Dec 14 Initials: JCM

3. The permittee shall ensure that all associated personnel:
 - a) have access to a copy of this permit;
 - b) are knowledgeable of the terms and conditions of this permit; and
 - c) receive the appropriate training for the purposes of carrying out the requirements of this permit.
4. The permittee shall provide notice in writing to an environmental protection analyst prior to any significant change of circumstances at the site, including without limitation:
 - a) discontinuation of any regulated activity at the site;
 - b) change of ownership of the site or any of the sources; and
 - c) change to the mailing address or phone number of the permittee.
5. The permittee shall obtain approval from an environmental protection analyst prior to:
 - a) any addition, modification, removal or replacement of any equipment or components related to the release, abatement, control or treatment of air emissions; or
 - b) any change in location of the source(s).
6. Where conflicts exist between this permit, the permit application or any plans, this permit shall prevail.
7. If an inspection reveals that the site or source(s) is in any way not in compliance with this permit, the permittee shall repair the damage or take other actions as required to bring the site or source(s) into compliance.
8. For clarity, all obligations of the permittee under this permit survive the expiry date to the extent that each is not superseded by one or more conditions in a subsequent permit.

PART 3: OPERATION AND MAINTENANCE

1. The permittee is authorized to operate two liquefied natural gas generators and five generators running exclusively on diesel fuel at the Whitehorse Station, and diesel generators at Mayo, Dawson and Faro stations. The permittee must obtain a permit amendment prior to adding any additional liquefied natural gas generators at the Whitehorse station.
2. In accordance with the manufacturer's recommendations and best management practices, the permittee shall inspect, maintain and operate the sources, any stand-alone air pollution control equipment, and testing and monitoring equipment as necessary to provide optimum control of air contaminant emissions during all operating periods.
3. Except for maintenance or test purposes, the permittee shall run the sources at each site in order of highest possible efficiency under the circumstances.
4. The permittee shall ensure that the fuel used by the source(s) conforms to the most recent Canadian federal *Sulphur in Diesel Fuel Regulations* for off-road applications.

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ENVIRONMENTAL PROGRAMS
Whitehorse, Yukon
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Date: 29 Dec 14 Initials: JKM

PART 4: RELEASE OF CONTAMINANTS

1. The visible emissions from any source shall not exceed an opacity of 20% as measured by an environmental protection officer.
2. In the event that the opacity of emissions from any source exceeds the criterion established in Part 4.1 of this permit, the permittee shall take measures to reduce the opacity of the emissions below that criterion as directed by an environmental protection officer.
3. The permittee shall ensure that particulates collected using emission control equipment are contained so that there is no release of contaminants to the atmosphere or into an open body of water.
4. If ambient air quality monitoring data within the area of influence of the Permittee's facility indicates that one or more of Yukon's Ambient Air Quality Standards is being exceeded, and the environmental protection officer is satisfied that the Permittee's facility is the cause or a significant contributor to the prevailing ambient air quality condition, the Permittee shall undertake such mitigation measures as may be specified by the environmental protection officer to improve the ambient air quality condition.

PART 5: MONITORING EMISSIONS

1. If any diesel generator has exceeded 3% of its annual potential to emit in a calendar year, and, in that same calendar year, if the total operating time of all the generators at that site exceeds 3% of their total annual potential to emit, the permittee shall create a emissions management plan to be submitted to the analyst for approval.
2. The permittee shall carry out any commitments in the approved emissions management plan on a schedule that is approved by the analyst.
3. The permittee shall quantify, through monitoring or calculations based on emissions data and published emissions factors, the levels of volatile organic compounds (VOCs) released in normal operations annually from the liquefied natural gas operations at the Whitehorse station.
4. The permittee shall quantify the fugitive emissions of methane (CH₄) from the point of unloading of the liquefied natural gas into the storage tank to and including any emissions from the generator not emanating from the stack at the Whitehorse station.

PART 6: REPORTING

1. The permittee shall submit to an environmental protection analyst a report which identifies:

a. the total annual operating hours for all sources at all sites;

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ENVIRONMENTAL PROGRAMS
Whitehorse, Yukon
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Date: 29 Dec 14 Initials: JCM

- b. the estimated total annual emissions of SO₂, PM_{2.5}, CO, NO₂, and N₂O from each source at each of the sites, including the calculation used to determine those results;
 - c. total annual emissions of volatile organic compounds (VOCs) as required in part 5.3 of this permit; and,
 - d. a summary of the fugitive CH₄ monitoring program including methodology, data, and total fugitive emissions as required in part 5.4 of this permit
- by March 31st of each year of this permit for the previous calendar year.

PART 7: UNAUTHORIZED EMISSIONS

1. The permittee shall contact either an environmental protection officer or the 24-hour Yukon Spill Report Centre (**867-667-7244**) as soon as possible under the circumstances in the event of an unauthorized release or emission, such as fugitive emissions or emissions resulting from burning fuel other than that allowed for under this permit.

PART 8: RECORDS

1. The permittee shall keep all records required under this permit in a format acceptable to an environmental protection officer for a minimum of three years and make them available for inspection by an environmental protection officer upon request.
2. The permittee shall keep the following records:
 - a) a copy of each report and approved plans developed under this permit, and any amendments to and approvals (if applicable) of each report and plan;
 - b) summaries of all inspections carried out under this permit (including the name of the person conducting the inspection, the date of each inspection, any observations recorded during the inspection, actions taken as a result of those observations, and the date each action was taken);
 - c) notes concerning any spills, leaks or unauthorized emissions occurring at the site, including substance involved, estimated quantity, date of observation of the spill or leak, spill reports made and clean-up procedures implemented;
 - d) any and all deficiencies remedied in accordance with Part 2.7, and how and when they were remedied; and
 - e) notes concerning any instance where the most efficient source was not used in accordance with Part 3.3 and the reason for use of the less efficient source.

DEPARTMENT OF ENVIRONMENT
ENVIRONMENTAL PROGRAMS
Whitehorse, Yukon
Certified true copy of original
Date 29 Dec 14 Initials JCM

From: Janine.Kostelnik@gov.yk.ca
To: [Travis Ritchie](#)
Subject: RE: NG 3rd Engine WRGS
Date: September 12, 2017 8:40:34 AM
Attachments: [image008.png](#)
[image010.png](#)
[image012.png](#)
[image014.png](#)

Hi Travis,

Thanks for this info. All you will need to do is complete an [application to amend your permit](#) with brief details as noted below and then I will process as normal.

Thanks and hope you had a good summer!

Janine

From: Travis Ritchie [mailto:Travis.Ritchie@yec.yk.ca]
Sent: Monday, September 11, 2017 10:45 AM
To: Janine.Kostelnik
Subject: NG 3rd Engine WRGS

Hi Janine,

Hope you had a great summer.

We are busy planning for the addition of a third natural gas generator to the Whitehorse Rapids Generating Station. This was included in the scope of the original project for future construction and was assessed under YESAA – i.e., a Decision Document exists to allow its authorization. Part 2, Item 5 of our air emissions permit requires us to gain approval from the Department prior to the addition of the 3rd unit. Part 3, Item 1 of the permit contemplates an amendment to the permit to explicitly acknowledge the presence of the 3rd unit. Perhaps a formal notification of its pending addition and proposed commissioning date is all that is required. Not sure. Would you kindly let me know what information you would require from us to approve the addition of the 3rd unit?

Thank you.

Regards,

Travis

Travis Ritchie P.Biol., EP
Manager - Environment, Assessment, & Licensing



Telephone: 867-393-5350 | Mobile: 867-333-0300



SustainableElectricityCompany™

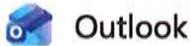


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SM-YEC-20141008



YEC - Air Emissions Permit Amendment

From Janine.Kostelnik@gov.yk.ca <Janine.Kostelnik@gov.yk.ca>
Date Fri 11/24/2017 11:28 AM
To Travis Ritchie <Travis.Ritchie@yec.yk.ca>
Cc Jennifer.Dagg@gov.yk.ca <Jennifer.Dagg@gov.yk.ca>

Hi Travis,

Please go ahead and submit [an application to amend your permit](#) to include the 4 mobile diesel units.

We will be moving ahead with conducting a Determination of Significant Change (YESAA, s.49(1)). The Department of Environment has determined internally that there is no significant change based on the limited operating time that you have proposed for emergency purposes only. However, part of this determination process is to consult with First Nations, so we will be seeking comments from Ta'an Kwach'an and Kwanlin Dun First Nations. As I understand, your team has already been in contact with KD and plans on meeting TKC early next, we will conduct a 7-day consultation ending on Monday December 4, after which we will, based on the comments received, be in a position to amend your Air Emissions permit. As we will be forwarding your application for review, I would ask that you include as much information as possible, including, but not limited to, a forecast of emissions under worst case scenario (previous modeling report that included the now retired units?), diagrams and information on the units themselves, emergency plan procedures, schedule, etc.

Thanks,

Janine Kostelnik

Environmental Protection Analyst

Environmental Programs Branch

Environment Yukon

Ph: 867-667-5456

Em: janine.kostelnik@gov.yk.ca

Web: http://www.env.gov.yk.ca/air-water-waste/air_emissions_regs.php

From: Travis Ritchie [mailto:Travis.Ritchie@yec.yk.ca]
Sent: Thursday, November 23, 2017 4:19 PM
To: Janine.Kostelnik
Subject: RE: Emergency Diesel Specs

Hi Janine,

Thanks for the update. We certainly appreciate the efforts of the Department to examine this matter with such care.

Regarding the fuel storage tank, it will be mobile, as in a fuel haul trailer (tanker trailer). It will not be a "fixed" installation, which is the definition under the Regulations that requires a permit as I understand things. In all cases we would still comply with applicable standards and guidelines related to such storage tanks and the associated fuel conveyance from storage tank to the fuel-using appliance.

Fuel storage would be considered an accessory activity to the principle activity, which is use of the generators. If Section 49(1) of YESAA were to apply to this emergency activity, then the fuel aspect would similarly not require assessment. If, however, a permit is deemed to be required for this "mobile" fuel storage system then we would certainly apply to amend our existing storage tank permit to allow for this activity.

Look forward to hearing from you tomorrow.

Thanks again.

Regards,

Travis

From: Janine.Kostelnik@gov.yk.ca [<mailto:Janine.Kostelnik@gov.yk.ca>]
Sent: November 23, 2017 3:29 PM
To: Travis Ritchie <Travis.Ritchie@yec.yk.ca>
Subject: RE: Emergency Diesel Specs

Hi Travis and thanks ... will need to talk just a bit more here and will get back to you tomorrow.

Please let me know what the size of the storage tank is in the picture? I wonder whether the installation of this storage tank will, in and of itself, require an assessment?

Janine

From: Travis Ritchie [<mailto:Travis.Ritchie@yec.yk.ca>]
Sent: Thursday, November 23, 2017 12:13 PM
To: Janine.Kostelnik
Subject: RE: Emergency Diesel Specs

I was going to say Janine, that if you want us to come up to your offices to provide any further info or to discuss the matter in more detail before you conclude your deliberations please let me know. We're happy to come right up.

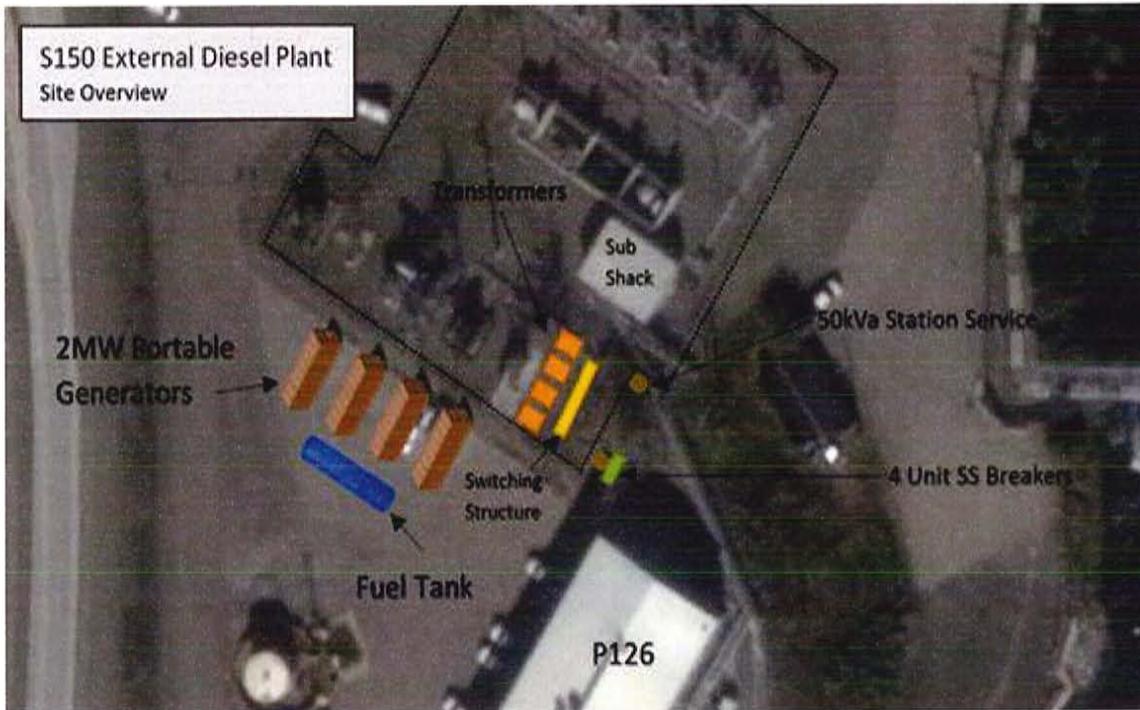
Regards,

Travis

From: Travis Ritchie
Sent: November 23, 2017 12:02 PM
To: 'Janine.Kostelnik@gov.yk.ca' <Janine.Kostelnik@gov.yk.ca>
Subject: RE: Emergency Diesel Specs

Hi Janine,

The units would be temporarily parked and connected adjacent the existing Whitehorse Diesel Plant and S150 Substation at the Whitehorse Rapids Generating Station (see conceptual image below. The existing diesel plant is located directly south at the bottom of the image).



The Whitehorse Rapids Generating Station currently maintains 5 diesel engines (16.2 MW) and 2 natural gas engines (8.8 MW) for a total of 25 MW. We retired 9 MW of diesel (2 units) when the 2 natural gas units were brought into service. There have been no changes since the last assessment/permit amendment in 2014.

Thanks again for your time to review this matter.

Regards,

Travis

From: Janine.Kostelnik@gov.yk.ca [mailto:Janine.Kostelnik@gov.yk.ca]

Sent: November 23, 2017 11:35 AM

To: Travis Ritchie <Travis.Ritchie@yec.yk.ca>

Subject: RE: Emergency Diesel Specs

Also Travis,

Can you tell me whether the number of generators has changed since last assessment? Have you got rid of any?

Janine

From: Janine.Kostelnik

Sent: Thursday, November 23, 2017 11:21 AM

To: 'Travis Ritchie'

Subject: RE: Emergency Diesel Specs

Thanks Travis,

Where are the 4 units proposed to be deployed?

Janine

From: Travis Ritchie [<mailto:Travis.Ritchie@yec.yk.ca>]
Sent: Thursday, November 23, 2017 11:06 AM
To: Janine.Kostelnik
Subject: Emergency Diesel Specs

Hi Janine,

Thanks again for your time this morning. Here is the spec sheet for the emergency diesel generators we propose to connect to the grid temporarily, and only to be operated in the case of an emergency.

I will ask Janet for the info sheet and get that to you ASAP. It might not be until the afternoon.

Regards,

Travis



Travis Ritchie P.Biol., EP
Manager - Environment, Assessment, & Licensing
Telephone: 867-393-5350 | Mobile: 867-333-0300



Sustainable Electricity Company



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SM-YEC-20141008



**Yukon Energy
Corporation**
P.O. Box 5920
Whitehorse
Yukon Y1A 6S7
Ph: (867) 393-5300
Fax: (867) 393-5322

November 27, 2017

File: 2515.03.01

Janine Kostelnik, Environmental Protection Analyst
Department of Environment, Standards & Approvals Section
Yukon Government
Box 2703
Whitehorse, Yukon Y1A 2C6

(Via email)

Dear Ms. Kostelnik,

**RE: AIR EMISSIONS PERMIT NO. 60-010 – APPLICATION FOR PERMIT AMENDMENT TO AUTHORIZE
OPERATION OF EMERGENCY DIESEL GENERATORS – WHITEHORSE RAPIDS GENERATING STATION**

Please find an application and supporting documentation regarding the above referenced permit amendment request.

Please contact me by telephone at 867.393.5350 or by email: travis.ritchie@yec.yk.ca if you have any questions, comments, or concerns with this submission.

Thank you for your time and consideration in this matter.

Yours Sincerely,

A handwritten signature in blue ink, appearing to read "Travis Ritchie".

Travis Ritchie, P.Biol., EP

Manager – Environment, Assessment, & Licensing

Attachment:
Air Emissions Permit Application and Supporting Attachments A-F



APPLICATION FOR RENEWAL, AMENDMENT OR CANCELLATION OF ENVIRONMENT ACT PERMITS

Please complete the following and ensure that all information is legibly printed or typed:

Permittee: Yukon Energy Corporation
(Business or individual name)

Permit type: Air Emissions Permit
(e.g. pesticide, special waste, air emissions, solid waste, land treatment facility, relocation, ODS/OH)

Permit number: 60-010
(e.g. 4201-XX-XXX)

Please check (✓) appropriate box:

Renewal

I have fully reviewed my permit and the information on my current permit is correct and complete and my business is operating as described therein.

Amendment

I have fully reviewed my permit and the following changes or additions have occurred and should be taken into account when renewing my permit (attach additional information if necessary):

Ownership: Yukon Energy Corporation (no change)

Mailing Address: Box 5920

Whitehorse Yukon Y1A 6S7

Site Location(s): Whitehorse Rapids Generating Station (No. 2 Miles Canyon Road, Whitehorse)

Telephone #: 867.393.5350 Fax #: _____

Email: travis.ritchie@yec.yk.ca

Products/Activities: Temporary use of up to 10MW mobile diesel generators.

Transport special wastes: yes: no:

Other: See attached supporting documents.

Note: additional information may be required depending on the nature of the change.

Cancellation

I am no longer undertaking the activities authorized by the above permit. I understand that I will be contacted by enforcement officials to confirm that a permit is no longer required, at the following coordinates:

Mailing Address: _____

Site Location(s): _____

Telephone #: _____ Fax #: _____

Email: _____

Permitted Activities: _____

I, Travis Ritchie [print name clearly], certify that I am an authorized representative of Yukon Energy Corporation [business name], and hereby make application for the renewal, amendment or cancellation of the above-noted permit, as indicated, and certify that the information provided on this form is correct.

Signature of applicant

November 27, 2017

Date

6 (Attachments A-F)

of attachments

This information is being collected under the authority of s.90 of the *Environment Act*. For further information contact the Environmental Programs Branch at (867) 667-5683.



Environment

Box 2703, Whitehorse, Yukon Y1A 2C6

December 12, 2017

Travis Ritchie
Manager, Environment, Assessment & Licensing
Yukon Energy Corporation
Email: Travis.Ritchie@yec.yk.ca

Dear Mr. Ritchie:

Re: Requirement for Assessment under the *Yukon Environmental and Socio-economic Assessment Act* for Renewal of Permit #60-010

As you are aware, s.49.1(1) of the *Yukon Environmental and Socio-economic Assessment Act* (YESAA) as amended in 2015 placed the responsibility for determining whether an assessment is required prior to renewal or amendment of an authorization on the Decision Body for the project. Assessment of an existing project is required when an authorization is renewed or amended, if, in the opinion of a Decision Body for the project, there is a significant change to the original project that would otherwise be subject to an assessment.

As the Decision Body on YESAA project 2011-0241 (YEC AEP renewal – Whitehorse Rapids Generating Station), and a regulator on project 2013-0115 (YEC Whitehorse Natural Gas Conversion), the Department of Environment has determined that there have been no significant changes to the air emissions components of the projects since these two previous assessments. Therefore, the amendment of Air Emissions Permit #60-010 does not require a YESAA assessment at this time.

We are in receipt of your amendment form and will proceed in issuing the permit to complete the renewal process.

Your project may require a new YESAA assessment in the future if there are significant changes to the site or activities. You are required to notify an environmental protection analyst if there are any changes to the air emissions components of your project as compared to the scope of the most recent YESAA assessment, so that the significance of the change can be determined. Inspections and/or enforcement officials may also conduct permit inspections to assess whether any changes have occurred.

Page 2
December 15, 2017

Please do not hesitate to contact either myself (867-667-8177; Todd.Powell@gov.yk.ca) or Janine Kostelnik (667-5456; Janine.Kostelnik@gov.yk.ca) if you have any questions about this determination.

Sincerely,



Todd Powell
A/Director, Environmental Programs

Enclosure: Record of Determination for Yukon Energy Corporation

cc: Lindsay DeHart, Development Assessment Branch (Lindsay.DeHart@gov.yk.ca)
Tim Smith, Yukon Environmental and Socioeconomic Assessment Board
John Ryder, Department of Environment (john.ryder@gov.yk.ca)
Yukon Oil & Gas Branch (Chioma.izugbokwe@gov.yk.ca)
EMO, Yukon (EMO.Yukon@gov.yk.ca)
Fire Marshal's Office (Joyia.Chakungal@gov.yk.ca)
City of Whitehorse (pat.ross@city.whitehorse.yk.ca)
Andrew Smith, Major Project Yukon (andrew.smith@gov.yk.ca)

RECORD OF DETERMINATION OF SIGNIFICANT CHANGE

DATE: December 11, 2017

NAME OF DECISION BODY: Department of Environment

PROJECT NAME: Yukon Energy Corporation

YESAB File #: 2011-0241, 2013-0115

PROPONENT NAME: Yukon Energy Corporation

REGULATORY AUTHORIZATION(S), LEGISLATION AND PERMIT #:

- 1. **Air Emissions Permit**
Air Emissions Regulations, Permit #60-010

YESAA subsection 49.1(1) states: "A new assessment of a project or existing project is not required when an authorization is renewed or amended unless, in the opinion of a decision body for the project, there is a significant change to the original project that would otherwise be subject to an assessment."

Following are the criteria, factors and analysis that have been taken into consideration by the Decision Body:

Criteria/Factors Considered	Analysis
1. Is the activity listed in the <u>Assessable Activities, Exceptions and Executive Committee Regulations</u> ? Identify the section of the regulations and how the exemptions do not apply.	<p><u>Schedule 1, Part 4.2</u></p> <p><u>Activity:</u> Construction, operation, <u>modification</u>, decommissioning or abandonment of, or other activity in relation to a fossil fuel-fired electrical generating station.</p> <p><u>Specific Exemption:</u> Construction, operation, <u>modification</u>, decommissioning or abandonment of, or other activity in relation to, a wind-powered electrical generating station if its production capacity is, and in the case of a modification remains, 50 kW or less.</p> <p>The exemption does not apply because the modification is specific to fossil fuel-fired electrical generation.</p>

Criteria/Factors Considered	Analysis
<p>2. How has the project changed since the previous assessment?</p>	<p>Yukon Energy Corporation (YEC) have requested an amendment to their Air Emissions permit to include the use of four (with a potential 5th unit in 2018/2019) Tier 2 diesel engines to the Whitehorse facility for N-1 emergency use only, to address potential capacity gaps over the winter months on an interim basis.</p>
<p>3. Were the subject, scale and scope of the changes to the project identified in #2 above discussed in the previous Evaluation Report or Decision Document?</p> <p>If the changes were discussed in the Evaluation Report or Decision Document, did YESAB provide any comment on how these changes would affect the environment?</p>	<p>The installed thermal capacity that was assessed in 2011-0241 was 25.2 MW of diesel. In 2013-0115 two of the diesel engines identified in 2011-0241 were taken out and replaced by LNG units. The two diesel generators decommissioned were rated at 3.92 MW and 5.15 MW (9.1 MW total). They were replaced by 2 modern natural gas units rated at 4.4 MW each (8.8 MW total). The proposed additional temporary engines were not directly discussed in either of the past two assessments, however the overall capacity of the facility remains within the 25MW.</p> <p>The air quality impact assessments conducted for each WRGS plant configuration (25MW diesel in 2008 and 2011 and 16.1 MW diesel + 8.8 MW natural gas in 2013) indicated that no significant adverse human health effects would result even under the worst case operating scenario for either facility configuration (all units operating under the most adverse meteorological conditions).</p> <p>The potential for temporary use of up to five units with 10 MW of diesel generation, using more modern and cleaner operating EPA Tier 2 rated engines, is not anticipated to result in significant changes to the overall facility emissions and the conclusions of previous air quality impact assessments for the station.</p>
<p>4. Do any of the changes identified in #2 conflict with any of the terms and conditions of the Decision Document in the previous</p>	<p>N/A</p>

Criteria/Factors Considered	Analysis
assessment?	
<p>5. During the previous assessment, did First Nations, organizations, other stakeholders, or the public indicate concerns about the project that could be intensified as a result of the proposed changes?</p>	<p><u>2011-0241</u>: residents of Riverdale raised some concerns about the cumulative short and long term health impact of diesel emissions on the already poor air quality in their neighbourhood. Concerns were also raised about a potential increase to noise levels, and about industrial customers being required to supply their own power. These concerns were raised by residents, Riverdale Community Association, and Yukon Conservation Society.</p> <p><u>2013-0115</u>: Many concerns were raised about the use and transportation of LNG to Whitehorse. These comments were specific to impacts about use of LNG, rather than the removal of the two diesel engines and therefore falls outside of the scope of this determination of significant change.</p>
<p>6. Do you consider the changes to the project to be "significant"? Why?</p>	<p>Yukon Environment has deemed that there are no significant changes to the project proposed.</p>

RATIONALE FOR DETERMINATION

Two previous YESAA assessments are relevant to this determination:

1. 2011-0241: renewal of Air Emissions Permit in order to maintain the ability to operate its diesel generating facilities.
2. 2013-0115: construction and operation of natural gas powered, reciprocating engine driven generation station and associated liquefied natural gas transfer, storage and vapourization facilities on the site adjacent to YECs hydroelectric facility. The two LNG generators replaced two existing diesel generators which were at the end of their life cycle with a total capacity of 8MW (9.1 MW nameplate rating).

An N-1 emergency event is a very unlikely incident where an extended winter power outage occurs due to loss of their largest source of electricity (Aishihik hydro plant or Aishihik to Whitehorse transmission line). YEC's 2016 Resource Plan identified that should they find themselves in an N-1 event situation, they may not be able to produce enough electricity to meet demand at peak times. Without emergency

back-up, rolling black-outs would be initiated, which is not a preferable solution.

YEC will be renting four diesel engines as back up this winter (2017/18), which if all ran at the same time, would generate less emissions than the two which were taken out of service in 2013, due to higher efficiency. The units are Tier 2 engines that meet current US Environmental Protection Agency guidelines for diesel generators, and would be the cleanest in their diesel fleet at the Whitehorse facility. The applicant is requesting this emergency use be approved during the winter seasons until 2021, which is when they plan on having a more permanent solution to addressing the longer term capacity gap.

The potential need for a 5th unit is based on a load forecast and the consideration of historic winter temperatures. Should ongoing load monitoring and any updating of the load forecast suggest that an additional 2 MW is needed to protect against an N-1 event, then an additional unit would be temporarily installed during the winter period in 2018/2019 and in future winters until such time as a permanent solution can be brought into service to address the current capacity gap.

The potential significance of this change may be considered both in light of the capacity but also of the air emissions resulting from the activity. Notwithstanding the contribution of the natural gas generators, the temporary use of up to 10 MW of Tier 2 diesel engines, the air quality impact assessment from previous assessments that indicated that there would be no significant adverse human health effects would result even under the worst case operating scenario for either facility configuration (all units operating under the most adverse meteorological conditions.

The amended air emissions permit will include appropriate operational, reporting and record keeping requirements.

The Decision Body has:

<p>Consulted with other decision bodies on the determination (if there are multiple decision bodies).</p>	<p><input checked="" type="checkbox"/> N/A-there are no other decision bodies for this project.</p>
<p>Discussed determination with other regulator(s) on the determination (if applicable)</p>	<p><input checked="" type="checkbox"/> The Department of Environment provided Yukon departments of EMR (O&G) and EMO, and the City of Whitehorse, with an opportunity to provide comments. No comments were received.</p>
<p>Ensured that First Nation consultation obligations are being met for this renewal or amendment</p>	<p><input checked="" type="checkbox"/> The Department of Environment initiated written consultation with Ta'an Kwächän Council and Kwanlin Dün First Nations on November 28, 2017. No comments were received from either of these First Nations.</p>

In the opinion of the Decision Body for this project, as noted in the reasons mentioned above, it has been determined that the renewal or amendment to the regulatory authorization:

- Requires a YESAA assessment
- Does not require a YESAA assessment



Todd Powell
A/Director, Environmental Programs
Department of Environment



Permit No: 60-010

AIR EMISSIONS PERMIT

Issued Pursuant to
the *Environment Act* and the *Air Emissions Regulations*

Permittee: Yukon Energy Corporation

Mailing Address: Box 5920, Whitehorse, Yukon, Y1A 6S7

Site Locations: Generating Plants at:
- Dawson
- Faro
- Mayo
- Whitehorse

Authorized Representative: Travis Ritchie
Phone/Fax: (867) 393-5350 / (867) 393-5322
Email: travis.ritchie@yec.yk.ca

Effective Date: Date of directors signature

This permit has been amended and replaces permit #60-010 issued on December 29, 2014.

Expiry Date: December 31, 2024

Scope of Authorization: In accordance with your application, you are authorized to operate electricity generating equipment at the above site locations (the "site(s)"), as set out in the terms and conditions of this permit.

Dated this 15 day of December, 2017

A handwritten signature in black ink, appearing to read "A. Powell", written over a horizontal line.

Director, Environmental Programs Branch
Environment Yukon

DEFINITIONS

1. In this permit,

“Act” means the *Environment Act*, R.S.Y. 2002, c. 76, as updated from time to time;

“approved plan” means a plan that is submitted by the permittee and approved by an environmental protection analyst under this permit and includes any terms and conditions specified by the environmental protection analyst in the approval;

“area of influence” refers to that area as determined in the Permittee’s air dispersion modelling submitted to the Branch in 2011 for Whitehorse and in 2012 for Dawson City;

“associated personnel” means all employees, contractors and volunteers involved in the permitted activities;

“Branch” means the Environmental Programs Branch, Environment Yukon;

“emission factor” means the mass emission of a pollutant per unit of energy produced in either grams per kilowatt-hour (g/kWh) or kilograms per megawatt-hour (kg/MWh);

“emission rate” means the average rate in grams per second (g/s) or kilograms/hour (kg/h) at which a pollutant is emitted from a source, determined either:

- i) as estimated based on emission factors derived from published literature regarding sources of similar type and age (estimated emission rates); or
- ii) as derived from measured data obtained from manual stack testing carried out by the permittee (measured emission rates);

“environmental protection analyst” means an employee of the Branch so designated by the Minister of Environment under the Act;

“environmental protection officer” means an employee of the Government of Yukon so designated by the Minister of Environment under the Act;

“N-1 Event” is a situation where an element within either the Whitehorse-Aishihik-Faro or Mayo-Dawson system (transmission line, generating unit, or any other element) fails, and would consequently require emergency back-up to avoid rolling black-outs in any of the communities.

“Regulations” means the *Air Emissions Regulations*, O.I.C. 1998/207;

“source” means a fuel-fired electricity generator which has a maximum nameplate capacity equal to or more than 1.0 megavolt-ampere;

“total annual emissions” means the emissions derived by multiplying emission factors or measured emission rates for each source by the previous three-year average total energy production for that source.

2. Any term not defined in this permit that is defined in the Act or the Regulations has the same meaning as in the Act or the Regulations.

PART 2: GENERAL

1. No condition of this permit limits the applicability of any other law or bylaw.

2. The permittee shall ensure that all activities authorized by this permit occur on property that the permittee has the right to enter upon and use for that purpose.
3. The permittee shall ensure that all associated personnel:
 - a) have access to a copy of this permit;
 - b) are knowledgeable of the terms and conditions of this permit; and
 - c) receive the appropriate training for the purposes of carrying out the requirements of this permit.
4. The permittee shall provide notice in writing to an environmental protection analyst prior to any significant change of circumstances at the site, including without limitation:
 - a) discontinuation of any regulated activity at the site;
 - b) change of ownership of the site or any of the sources; and
 - c) change to the mailing address or phone number of the permittee.
5. The permittee shall obtain approval from an environmental protection analyst prior to:
 - a) any addition, modification, removal or replacement of any equipment or components related to the release, abatement, control or treatment of air emissions; or
 - b) any change in location of the source(s).
6. Where conflicts exist between this permit, the permit application or any plans, this permit shall prevail.
7. If an inspection reveals that the site or source(s) is in any way not in compliance with this permit, the permittee shall repair the damage or take other actions as required to bring the site or source(s) into compliance.
8. For clarity, all obligations of the permittee under this permit survive the expiry date to the extent that each is not superseded by one or more conditions in a subsequent permit.

PART 3: OPERATION AND MAINTENANCE

1. The permittee is authorized to operate two liquefied natural gas generators and five generators running exclusively on diesel fuel at the Whitehorse Station, and diesel generators at Mayo, Dawson and Faro stations. The permittee must obtain a permit amendment prior to adding any additional liquefied natural gas generators at the Whitehorse station.
2. In accordance with the manufacturer's recommendations and best management practices, the permittee shall inspect, maintain and operate the sources, any stand-alone air pollution control equipment, and testing and monitoring equipment as necessary to provide optimum control of air contaminant emissions during all operating periods.
3. Except for maintenance or test purposes, the permittee shall run the sources at each site in order of highest possible efficiency under the circumstances.

4. The permittee shall ensure that the fuel used by the source(s) conforms to the most recent Canadian federal *Sulphur in Diesel Fuel Regulations* for off-road applications.

PART 4: RELEASE OF CONTAMINANTS

1. The visible emissions from any source shall not exceed an opacity of 20% as measured by an environmental protection officer.
2. In the event that the opacity of emissions from any source exceeds the criterion established in Part 4.1 of this permit, the permittee shall take measures to reduce the opacity of the emissions below that criterion as directed by an environmental protection officer.
3. The permittee shall ensure that particulates collected using emission control equipment are contained so that there is no release of contaminants to the atmosphere or into an open body of water.
4. If ambient air quality monitoring data within the area of influence of the Permittee's facility indicates that one or more of Yukon's Ambient Air Quality Standards is being exceeded, and the environmental protection officer is satisfied that the Permittee's facility is the cause or a significant contributor to the prevailing ambient air quality condition, the Permittee shall undertake such mitigation measures as may be specified by the environmental protection officer to improve the ambient air quality condition.

PART 5: MONITORING EMISSIONS

1. If any diesel generator has exceeded 3% of its annual potential to emit in a calendar year, and, in that same calendar year, if the total operating time of all the generators at that site exceeds 3% of their total annual potential to emit, the permittee shall create a emissions management plan to be submitted to the analyst for approval.
2. The permittee shall carry out any commitments in the approved emissions management plan on a schedule that is approved by the analyst.
3. The permittee shall quantify, through monitoring or calculations based on emissions data and published emissions factors, the levels of volatile organic compounds (VOCs) released in normal operations annually from the liquefied natural gas operations at the Whitehorse station.
4. The permittee shall quantify the fugitive emissions of methane (CH₄) from the point of unloading of the liquefied natural gas into the storage tank to and including any emissions from the generator not emanating from the stack at the Whitehorse station.

PART 6: REPORTING

1. The permittee shall submit to an environmental protection analyst a report which identifies:
 - a. the total annual operating hours for all sources at all sites;
 - b. the estimated total annual emissions of SO₂, PM_{2.5}, CO, NO₂, and N₂O from each source at each of the sites, including the calculation used to determine those results;
 - c. total annual emissions of volatile organic compounds (VOCs) as required in part 5.3 of this permit; and,
 - d. a summary of the fugitive CH₄ monitoring program including methodology, data, and total fugitive emissions as required in part 5.4 of this permitby March 31st of each year of this permit for the previous calendar year.

PART 7: UNAUTHORIZED EMISSIONS

1. The permittee shall contact either an environmental protection officer or the 24-hour Yukon Spill Report Centre (867-667-7244) as soon as possible under the circumstances in the event of an unauthorized release or emission, such as fugitive emissions or emissions resulting from burning fuel other than that allowed for under this permit.

PART 8: RECORDS

1. The permittee shall keep all records required under this permit in a format acceptable to an environmental protection officer for a minimum of three years and make them available for inspection by an environmental protection officer upon request.
2. The permittee shall keep the following records:
 - a) a copy of each report and approved plans developed under this permit, and any amendments to and approvals (if applicable) of each report and plan;
 - b) summaries of all inspections carried out under this permit (including the name of the person conducting the inspection, the date of each inspection, any observations recorded during the inspection, actions taken as a result of those observations, and the date each action was taken);
 - c) notes concerning any spills, leaks or unauthorized emissions occurring at the site, including substance involved, estimated quantity, date of observation of the spill or leak, spill reports made and clean-up procedures implemented;
 - d) any and all deficiencies remedied in accordance with Part 2.7, and how and when they were remedied; and
 - e) notes concerning any instance where the most efficient source was not used in accordance with Part 3.3 and the reason for use of the less efficient source.

PART 9: EMERGENCY BACK-UP DIESEL GENERATORS AT WHITEHORSE STATION

1. The permittee is authorized to operate up to five emergency back-up generators, exclusively on diesel fuel at the Whitehorse Station only in the event that an N-1 event occurs, and periodically for short periods to confirm operational readiness, up to March

31st, 2020, unless otherwise approved by the Branch.

2. In accordance with the manufacturer's recommendations and best management practices, the permittee shall inspect, maintain and operate the sources, any stand-alone air pollution control equipment, and testing and monitoring equipment as necessary to provide optimum control of air contaminant emissions during all operating periods.
3. Except for maintenance or test purposes, the permittee shall run the sources at each site in order of highest possible efficiency under the circumstances.
4. The permittee shall ensure that the fuel used by the source(s) conforms to the most recent Canadian federal *Sulphur in Diesel Fuel Regulations* for off-road applications.

From: Janine.Kostelnik@gov.yk.ca
To: [Travis Ritchie](#)
Cc: Jacquie.VanMarck@gov.yk.ca
Subject: Determination and AER Permit
Date: December 15, 2017 2:45:12 PM

Hi Travis:

This afternoon you will be receiving:

- official letter from ENV advising no significant change;
- determination of significant change; and,
- amended AER permit.

Jacquie will be stick handling it from this point on. She can be reached at 667-5683.

Have a good weekend!

Janine Kostelnik

Environmental Protection Analyst

Environmental Programs Branch

Environment Yukon

Ph: 867-667-5456

Em: janine.kostelnik@gov.yk.ca

Web: http://www.env.gov.yk.ca/air-water-waste/air_emissions_regs.php

From: Jacquie.VanMarck@gov.yk.ca
To: [Travis Ritchie](mailto:Travis.Ritchie)
Cc: Lindsay.Dehart@gov.yk.ca; Tim.Smith@yesab.ca; John.Ryder@gov.yk.ca; EMO.Yukon@gov.yk.ca;
Joyia.Chakungal@gov.yk.ca; patrick.ross@whitehorse.ca; Andrew.Smith@gov.yk.ca; Janine.Kostelnik@gov.yk.ca;
Todd.Powell@gov.yk.ca; Chioma.Izugbokwe@gov.yk.ca
Subject: Requirement for Assessment under the YESAA for Renewal of Permit #60-010
Date: December 15, 2017 2:45:14 PM
Attachments: [Record of Determination dec 2017.pdf](#)
[Air Emissions Permit 60-010 dec 2017.pdf](#)
[TRitchie letter dec 2017.pdf](#)

Please find attached a letter from Todd Powell, A/Director of Environmental Programs regarding the requirement for assessment under the Yukon Environmental and Socio-economic Assessment Act for Renewal of Permit #60-010.

Also attached is Air Emissions Permit #60-010 and the Record of Determination of Significant Change for Proponent Yukon Energy Corporation.

Jacquie Van Marck

Administrative Assistant

Environmental Programs Branch

Yukon Government

(PH) 867-667-5683

(Fax) 867-393-6213

From: Travis Ritchie [<mailto:Travis.Ritchie@yec.yk.ca>]
Sent: Wednesday, May 16, 2018 2:02 PM
To: Janine.Kostelnik
Subject: RE: Amendment to AER Permit 60-010

Hi Janine,

Just wanted to check in to see if you had a chance to consider the question I posed at the end of my last email below.

Thanks for your time.

Regards,

Travis

From: Travis Ritchie
Sent: May 9, 2018 1:41 PM
To: 'Janine.Kostelnik@gov.yk.ca' <Janine.Kostelnik@gov.yk.ca>
Subject: RE: Amendment to AER Permit 60-010

Hi Janine,

Thank you for your email and the information regarding augmenting the back-up capacity at the Whitehorse Rapids Generating Station. We will look to complete the form so that the Department can proceed with the amendment for the additional emergency backup capacity.

Regarding the addition of the 3rd LNG unit, this was included in the scope of Project Assessment 2013-0115 and its associated Decision Document. As such, it was our expectation that we needed only to apply for a permit amendment to add the 3rd unit.

For the sake of simplicity I was thinking I would just include the addition of both units into a single amendment application. Given this information can you confirm that a single application would suffice?

Regards,

Travis

From: Janine.Kostelnik@gov.yk.ca [<mailto:Janine.Kostelnik@gov.yk.ca>]
Sent: May 9, 2018 1:11 PM
To: Travis Ritchie <Travis.Ritchie@yec.yk.ca>
Cc: Jennifer.Dagg@gov.yk.ca

Subject: Amendment to AER Permit 60-010

Hi Travis,

We have reviewed your request to amend your permit to include an additional diesel generator for N-1 back up purposes, and have determined that this does not warrant a YESAA. The reason is that the rated output is lower than the originally scoped in output, based on nameplate capacity.

Please submit your application form so we can proceed with the amendment. Application to amend permits can be found [here](#).

You had advised that YEC will be adding an additional LNG unit, which will require an assessment. As part of our decision to issue a permit for another N-1 generator, we find it would be in the best interest of all involved, to include information about the N-1 back up system in your proposed assessment.

Thanks,



Janine Kostelnik
Environmental Protection Analyst
Environment
T 867-667-5456 | Yukon.ca

From: Janine.Kostelnik
Sent: Monday, April 16, 2018 11:47 AM
To: 'Travis Ritchie'
Subject: RE: Time for a Call?

Hi Travis – thanks for this.

YESAA scoped in 10MW right? If so, then we're capped by that and an assessment will be required, not the answer you want, but likely the path forward. If 12MW+ was scoped in, then I'm confident that a simple amendment will do.

We'll talk this afternoon.

Thanks,



From: Travis Ritchie [<mailto:Travis.Ritchie@yec.yk.ca>]
Sent: Monday, April 16, 2018 10:12 AM
To: Janine.Kostelnik
Subject: RE: Time for a Call?

Hi,

To preface our discussion...

Last year when we applied for the amendment to allow for contingency/emergency diesel unit use at the Whitehorse Rapids Generating Station, we indicated that we had a cap of 10 MW, as that was all our site substation could accommodate. As such, that was all I included in the application to amend our permit. Our Engineering Department has since determined that the substation at WRGS can accommodate up to 12 MW of contingency generation. I wanted to go over this with you and discuss whether this max capacity change could be authorized (i.e., from 10MW to 12MW).

Talk to you soon.

Thanks.

T

From: Janine.Kostelnik@gov.yk.ca [<mailto:Janine.Kostelnik@gov.yk.ca>]
Sent: April 16, 2018 10:01 AM
To: Travis Ritchie <Travis.Ritchie@yec.yk.ca>
Subject: RE: Time for a Call?

Sounds good – anything I can look into before our call please let me know.

Janine Kostelnik



From: Travis Ritchie [<mailto:Travis.Ritchie@yec.yk.ca>]
Sent: Monday, April 16, 2018 9:52 AM
To: Janine.Kostelnik
Subject: RE: Time for a Call?

Hi Janine,

Sure. How about 1:30 pm?

I can call you.

Regards,

T

From: Janine.Kostelnik@gov.yk.ca [<mailto:Janine.Kostelnik@gov.yk.ca>]

Sent: April 16, 2018 9:36 AM

To: Travis Ritchie <Travis.Ritchie@yec.yk.ca>

Subject: RE: Time for a Call?

Hi Travis,

How about this afternoon ...

Janine Kostelnik



From: Travis Ritchie [<mailto:Travis.Ritchie@yec.yk.ca>]

Sent: Friday, April 13, 2018 11:51 AM

To: Janine.Kostelnik

Subject: Time for a Call?

Hi Janine,

Just wanted to check with you to see if you might have time for a short call this afternoon to discuss a question I have with air emissions permit 60-010?

Thanks.

Regards,

Travis



Travis Ritchie P.Biol., EP

Manager - Environment, Assessment, & Licensing

Telephone: 867-393-5350 | Mobile: 867-333-0300



From: [Travis Ritchie](#)
To: ["Janine.Kostelnik@gov.yk.ca"](mailto:Janine.Kostelnik@gov.yk.ca)
Subject: AEP 60-010 Amendment Application
Date: August 27, 2018 4:20:00 PM
Attachments: [AEP 60.010 Amendment Application 2018.08.27.pdf](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Hello Janine,

Please find our application and supporting documentation to amend Air Emissions Permit (No. 60-010) to incorporate the previously assessed natural gas 3rd engine, as well as the provision for an additional 2MW of short term back up diesel capacity we discussed earlier this year.

If you have any questions, comments, or concerns with the application please let me know.

Thank you for your time and consideration.

Regards,

Travis



Travis Ritchie P.Biol., EP
Manager - Environment, Assessment, & Licensing
Telephone: 867-393-5350 | Mobile: 867-333-0300



Sustainable Electricity Company™



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SM-YEC-20141008



**Yukon Energy
Corporation**
P.O. Box 5920
Whitehorse
Yukon Y1A 6S7
Ph: (867) 393-5300
Fax: (867) 393-5322

August 27, 2018

File: 2515.03.01

Janine Kostelnik, Environmental Protection Analyst
Department of Environment, Standards & Approvals Section
Yukon Government
Box 2703
Whitehorse, Yukon Y1A 2C6

(Via email)

Dear Ms. Kostelnik,

**RE: AIR EMISSIONS PERMIT NO. 60-010 – APPLICATION FOR PERMIT AMENDMENT TO
AUTHORIZE OPERATION OF EMERGENCY DIESEL GENERATORS AND ADDITION OF THE THIRD
NATURAL GAS GENERATOR - WHITEHORSE RAPIDS GENERATING STATION**

Please find an application and supporting documentation regarding the above referenced permit amendment request.

Please contact me by telephone at 867.393.5350 or by email: travis.ritchie@yec.yk.ca if you have any questions, comments, or concerns with this submission.

Thank you for your time and consideration in this matter.

Yours Sincerely,

A handwritten signature in blue ink, appearing to read 'Travis Ritchie', with a long horizontal flourish extending to the right.

Travis Ritchie, P.Biol.

Manager – Environment, Assessment, & Licensing

Attachment:
Air Emissions Permit Application and Supporting Attachments A-E



APPLICATION FOR RENEWAL, AMENDMENT OR CANCELLATION OF ENVIRONMENT ACT PERMITS

Please complete the following and ensure that all information is legibly printed or typed:

Permittee: Yukon Energy Corporation
(Business or individual name)

Permit type: Air Emissions Permit
(e.g. pesticide, special waste, air emissions, solid waste, land treatment facility, relocation, ODS/OH)

Permit number: 60-010
(e.g. 4201-XX-XXX)

Please check (✓) appropriate box:

Renewal

I have fully reviewed my permit and the information on my current permit is correct and complete and my business is operating as described therein.

Amendment

I have fully reviewed my permit and the following changes or additions have occurred and should be taken into account when renewing my permit (attach additional information if necessary):

Ownership: Yukon Energy Corporation (no change)

Mailing Address: Box 5920

Whitehorse Yukon Y1A 6S7

Site Location(s): Whitehorse Rapids Generating Station (No. 2 Miles Canyon Road, Whitehorse)

Telephone #: 867.393.5350 Fax #: _____

Email: travis.ritchie@yec.yk.ca

Products/Activities: Temp. use of up to 12MW mobile diesel generators and addition of 3rd Nat. Gas Genset

Transport special wastes: yes: no:

Other: See attached supporting documents.

Note: additional information may be required depending on the nature of the change.

Cancellation

I am no longer undertaking the activities authorized by the above permit. I understand that I will be contacted by enforcement officials to confirm that a permit is no longer required, at the following coordinates:

Mailing Address: _____

Site Location(s): _____

Telephone #: _____ Fax #: _____

Email: _____

Permitted Activities: _____

I, Travis Ritchie [print name clearly], certify that I am an authorized representative of Yukon Energy Corporation [business name], and hereby make application for the renewal, amendment or cancellation of the above-noted permit, as indicated, and certify that the information provided on this form is correct.

Signature of applicant

August 27, 2018

Date

6 (Attachments A-F)

of attachments

This information is being collected under the authority of s.90 of the Environment Act. For further information contact the Environmental Programs Branch at (867) 667-5683.



Permit No: 60-010

AIR EMISSIONS PERMIT

Issued Pursuant to
the *Environment Act* and the *Air Emissions Regulations*

Permittee: Yukon Energy Corporation

Mailing Address: Box 5920, Whitehorse, Yukon, Y1A 6S7

Site Locations: Generating Plants at:
- Dawson
- Faro
- Mayo
- Whitehorse

Authorized Representative: Travis Ritchie
Phone/Fax: (867) 393-5350 / (867) 393-5322
Email: travis.ritchie@yec.yk.ca

Effective Date: Date of Director's signature

This permit has been amended and replaces permit #60-010 issued on December 15, 2017.

Expiry Date: December 31, 2024

Scope of Authorization: In accordance with your application, you are authorized to operate electricity generating equipment at the above site locations (the "site(s)"), as set out in the terms and conditions of this permit.

Dated this 4th day of October, 2018

A handwritten signature in black ink, appearing to read "T. Powell".

Director, Environmental Programs Branch
Environment Yukon

PART 1: DEFINITIONS

1. In this permit,

“Act” means the *Environment Act*, R.S.Y. 2002, c. 76, as updated from time to time;

“approved plan” means a plan that is submitted by the permittee and approved by an environmental protection analyst under this permit and includes any terms and conditions specified by the environmental protection analyst in the approval;

“area of influence” refers to that area as determined in the Permittee’s air dispersion modelling submitted to the Branch in 2011 for Whitehorse and in 2012 for Dawson City;

“associated personnel” means all employees, contractors and volunteers involved in the permitted activities;

“Branch” means the Environmental Programs Branch, Environment Yukon;

“emission factor” means the mass emission of a pollutant per unit of energy produced in either grams per kilowatt-hour (g/kWh) or kilograms per megawatt-hour (kg/MWh);

“emission rate” means the average rate in grams per second (g/s) or kilograms/hour (kg/h) at which a pollutant is emitted from a source, determined either:

- i) as estimated based on emission factors derived from published literature regarding sources of similar type and age (estimated emission rates); or
- ii) as derived from measured data obtained from manual stack testing carried out by the permittee (measured emission rates);

“environmental protection analyst” means an employee of the Branch so designated by the Minister of Environment under the Act;

“environmental protection officer” means an employee of the Government of Yukon so designated by the Minister of Environment under the Act;

“N-1 Event” is a situation where a transmission line, generating unit, or any other element within either the Whitehorse-Aishihik-Faro or Mayo-Dawson system fails, and consequently requires emergency back-up to avoid rolling black-outs in any of the communities;

“Regulations” means the *Air Emissions Regulations*, O.I.C. 1998/207;

“source” means a fuel-fired electricity generator which has a maximum nameplate capacity equal to or more than 1.0 megavolt-ampere;

“total annual emissions” means the emissions derived by multiplying emission factors or measured emission rates for each source by the previous three-year average total energy production for that source.

2. Any term not defined in this permit that is defined in the Act or the Regulations has the same meaning as in the Act or the Regulations.

PART 2: GENERAL

1. No condition of this permit limits the applicability of any other law or bylaw.

2. The permittee shall ensure that all activities authorized by this permit occur on property that the permittee has the right to enter upon and use for that purpose.
3. The permittee shall ensure that all associated personnel:
 - a) have access to a copy of this permit;
 - b) are knowledgeable of the terms and conditions of this permit; and
 - c) receive the appropriate training for the purposes of carrying out the requirements of this permit.
4. The permittee shall provide notice in writing to an environmental protection analyst prior to any significant change of circumstances at the site, including without limitation:
 - a) discontinuation of any regulated activity at the site;
 - b) change of ownership of the site or any of the sources; and
 - c) change to the mailing address or phone number of the permittee.
5. The permittee shall obtain approval from an environmental protection analyst prior to:
 - a) any addition, modification, removal or replacement of any equipment or components related to the release, abatement, control or treatment of air emissions; or
 - b) any change in location of the source(s).
6. Where conflicts exist between this permit, the permit application or any plans, this permit shall prevail.
7. If an inspection reveals that the site or source(s) is in any way not in compliance with this permit, the permittee shall repair the damage or take other actions as required to bring the site or source(s) into compliance.
8. For clarity, all obligations of the permittee under this permit survive the expiry date to the extent that each is not superseded by one or more conditions in a subsequent permit.

PART 3: OPERATION AND MAINTENANCE

1. The permittee is authorized to operate three liquefied natural gas generators; and five generators running exclusively on diesel fuel at the Whitehorse Station, and diesel generators at Mayo, Dawson and Faro stations. The permittee must obtain a permit amendment prior to adding any additional liquefied natural gas generators at the Whitehorse station.
2. In accordance with the manufacturer's recommendations and best management practices, the permittee shall inspect, maintain and operate the sources, any stand-alone air pollution control equipment, and testing and monitoring equipment as necessary to provide optimum control of air contaminant emissions during all operating periods.
3. Except for maintenance or test purposes, the permittee shall run the sources at each site in order of highest possible efficiency under the circumstances.

4. The permittee shall ensure that the fuel used by the source(s) conforms to the most recent Canadian federal *Sulphur in Diesel Fuel Regulations* for off-road applications.

PART 4: RELEASE OF CONTAMINANTS

1. The visible emissions from any source shall not exceed an opacity of 20% as measured by an environmental protection officer.
2. In the event that the opacity of emissions from any source exceeds the criterion established in Part 4.1 of this permit, the permittee shall take measures to reduce the opacity of the emissions below that criterion as directed by an environmental protection officer.
3. The permittee shall ensure that particulates collected using emission control equipment are contained so that there is no release of contaminants to the atmosphere or into an open body of water.
4. If ambient air quality monitoring data within the area of influence of the Permittee's facility indicates that one or more of Yukon's Ambient Air Quality Standards is being exceeded, and the environmental protection officer is satisfied that the Permittee's facility is the cause or a significant contributor to the prevailing ambient air quality condition, the Permittee shall undertake such mitigation measures as may be specified by the environmental protection officer to improve the ambient air quality condition.

PART 5: MONITORING EMISSIONS

1. If any diesel generator has exceeded 3% of its annual potential to emit in a calendar year, and, in that same calendar year, if the total operating time of all the generators at that site exceeds 3% of their total annual potential to emit, the permittee shall create a emissions management plan to be submitted to the analyst for approval.
2. The permittee shall carry out any commitments in the approved emissions management plan on a schedule that is approved by the analyst.
3. The permittee shall quantify, through monitoring or calculations based on emissions data and published emissions factors, the levels of volatile organic compounds (VOCs) released in normal operations annually from the liquefied natural gas operations at the Whitehorse station.
4. The permittee shall quantify the fugitive emissions of methane (CH₄) from the point of unloading of the liquefied natural gas into the storage tank to and including any emissions from the generator not emanating from the stack at the Whitehorse station.

PART 6: REPORTING

1. The permittee shall submit to an environmental protection analyst a report which identifies:
 - a. the total annual operating hours for all sources at all sites;
 - b. the estimated total annual emissions of SO₂, PM_{2.5}, CO, NO₂, and N₂O from each source at each of the sites, including the calculation used to determine those results;
 - c. total annual emissions of volatile organic compounds (VOCs) as required in part 5.3 of this permit; and,
 - d. a summary of the fugitive CH₄ monitoring program including methodology, data, and total fugitive emissions as required in part 5.4 of this permit;by March 31st of each year of this permit for the previous calendar year.

PART 7: UNAUTHORIZED EMISSIONS

1. The permittee shall contact either an environmental protection officer or the 24-hour Yukon Spill Report Centre (**867-667-7244**) as soon as possible under the circumstances in the event of an unauthorized release or emission, such as fugitive emissions or emissions resulting from burning fuel other than that allowed for under this permit.

PART 8: RECORDS

1. The permittee shall keep all records required under this permit in a format acceptable to an environmental protection officer for a minimum of three years and make them available for inspection by an environmental protection officer upon request.
2. The permittee shall keep the following records:
 - a) a copy of each report and approved plans developed under this permit, and any amendments to and approvals (if applicable) of each report and plan;
 - b) summaries of all inspections carried out under this permit (including the name of the person conducting the inspection, the date of each inspection, any observations recorded during the inspection, actions taken as a result of those observations, and the date each action was taken);
 - c) notes concerning any spills, leaks or unauthorized emissions occurring at the site, including substance involved, estimated quantity, date of observation of the spill or leak, spill reports made and clean-up procedures implemented;
 - d) any and all deficiencies remedied in accordance with Part 2.7, and how and when they were remedied; and
 - e) notes concerning any instance where the most efficient source was not used in accordance with Part 3.3 and the reason for use of the less efficient source.

PART 9: EMERGENCY BACK-UP DIESEL GENERATORS AT WHITEHORSE STATION

1. The permittee is authorized to operate up to six emergency back-up generators, to a maximum cumulative total of 12 MW (2MW maximum capacity per unit), exclusively on diesel fuel at the Whitehorse Station only in the event that an N-1 event occurs, and

periodically for short periods to confirm operational readiness, up until March 31st, 2022, unless otherwise approved by the Branch.

2. In accordance with the manufacturer's recommendations and best management practices, the permittee shall inspect, maintain and operate the sources, any stand-alone air pollution control equipment, and testing and monitoring equipment as necessary to provide optimum control of air contaminant emissions during all operating periods.
3. Except for maintenance or test purposes, the permittee shall run the sources at each site in order of highest possible efficiency under the circumstances.
4. The permittee shall ensure that the fuel used by the source(s) conforms to the most recent Canadian federal *Sulphur in Diesel Fuel Regulations* for off-road applications.

From: Elizabeth.Barker@gov.yk.ca
To: Travis.Ritchie
Subject: RE: AEP 60-010 Amendment
Date: October 13, 2020 4:05:52 PM

Good Afternoon Travis,

We have determined that the information provided in YEC's previous Faro station YESAA assessments (2008-0230 and 2011-0246) is still valid for the proposed 2020 amendment of reinstalling capacity of approximately 5.65MW at the Faro generating station. YEC has authorization to reinstall previously relocated/de-rated capacity of up to 10.6MW, cumulative station capacity, without proceeding through the YESAA assessment process. As discussed, any additional capacity increase that will bring the Faro station's cumulative capacity above 10.6MW will need to proceed through the YESAA assessment process before being considered. As this amendment doesn't change the content of your current Air Emissions Permit 60-010, we will not be issuing an amended permit and you may continue to use permit 60-010 as is .

Cheers,

Liz

Elizabeth Barker
Environmental Protection Analyst
Department of Environment
Government of Yukon
(867) 667-5456

From: Travis Ritchie
Sent: September 28, 2020 1:30 PM
To: Elizabeth.Barker
Subject: RE: AEP 60-010 Amendment

*** External E-mail: Do not click on links or attachments except from trusted senders. ***

Hi Elizabeth,

Please see the revised request for approval to reinstall previously relocated and de-rated site capacity.

I have also attached the previous Faro GS project proposal supporting document listing the past site capacity, the YESAA Evaluation Report and the YG Decision Document all for easy reference.

Thank you for your time.

Regards,

Travis

From: Elizabeth.Barker@gov.yk.ca [<mailto:Elizabeth.Barker@gov.yk.ca>]

Sent: September 28, 2020 12:58 PM

To: Travis Ritchie <Travis.Ritchie@yec.yk.ca>

Subject: RE: AEP 60-010 Amendment

Hi Travis,

My apologies for the late reply, I only reviewed the 2014 Faro YESAA assessment. Let me have a quick look through the 2008 and 2011 reports and get back to you.

From our end, it will definitely be easier if you to resubmit the amendment application and exclude YM23-YM25 as you have mentioned below.

I fly out of the territory tomorrow and will be away for one week but I will get back to you once I return.

Thanks for your patience,

Liz

From: Travis Ritchie <Travis.Ritchie@yec.yk.ca>

Sent: September 24, 2020 10:06 AM

To: Elizabeth.Barker <Elizabeth.Barker@gov.yk.ca>

Subject: RE: AEP 60-010 Amendment

Importance: High

Hi Elizabeth,

Thanks for your reply.

Given that the facility was assessed favourably under YESAA in both 2008 and 2011, prior to relocating units FD3 (1 MW) and FD5 (1.4 MW) and there have been no other changes to the facility since 2008, I was anticipating that either Decision Document 2008.0230 or 2011.0246 were technically still valid for the purposes of granting an approval to at least reinstall both the relocated and de-rated generating capacity at the site. Those were the only changes to the facility during its last assessment, so the activities remain the same across all assessments. I understand the need to assess the additional capacity (beyond what has been assessed historically) before it can be permitted, but I would ask for approval to reinstall the previously relocated and de-rated capacity

pursuant to the 2008/2011 assessment findings and related decision documents.

If you need, I can resubmit the amendment application for reinstallation of only the previously assessed capacity, removing reference to the 3 additional units (YM23-YM25). YEC can then work on getting a YESAA assessment completed for the additional capacity, which could be permitted afterward.

Does that sound reasonable? If it's helpful to speak on the phone please let me know and I will call you at a convenient time.

Thanks again.

Regards,

Travis

From: Elizabeth.Barker@gov.yk.ca [mailto:Elizabeth.Barker@gov.yk.ca]

Sent: September 23, 2020 5:03 PM

To: Travis Ritchie <Travis.Ritchie@yec.yk.ca>

Subject: AEP 60-010 Amendment

Good Afternoon Travis,

According to the Assessable Activities Regulation under YESAA, Part 4, Item 2 (b) applies to your AEP 60-010 amendment application.

PART 4

Energy and Telecommunications

	Column 1	Column 2
Item	Activity	Specific Exception
1	Construction, installation, operation, modification, decommissioning or abandonment of, or other activity in relation to, a power line or a telecommunications line	
2	Construction, operation, modification, decommissioning or abandonment of, or other activity in relation to, <ul style="list-style-type: none"> • (a) a hydroelectric generating station; • (b) a fossil fuel-fired electrical generating station; • (c) a wind-powered electrical generating station; • (d) a wood-fired electrical generating station; or • (e) a wood-fuelled heating facility for the commercial sale of heat 	Construction, operation, modification, decommissioning or abandonment of, or other activity in relation to, a wind-powered electrical generating station if its production capacity is, and in the case of a modification remains, 50 kW or less

Specifically, the Faro generating station underwent a YESAA assessment in 2014. In the assessment, FD1 and FD7 were assessed with production capacities of 5.15MW and 3MW for a total of 8.15MW.

Currently, FD1 and FD7 have been derated to 2.4MW and 2.8MW however, with the addition of YM20-22 (5.4MW) and the addition of the YM23-25(5.4MW) as emergency backup, this brings the station capacity to a total of 16MW. This is 7.85MW greater than the capacity that was previously assessed in 2014. As the modification of production capacity is greater than 50kW, this project will need to proceed through YESAB before we can issue any permit amendments.

Please let me know if you would like to discuss this further.

Have a great day,

Liz



Yukon Environmental and Socio-economic Assessment Act

Decision Document

This document meets the decision bodies' requirements as set out in the *Yukon Environmental & Socio-economic Assessment Act*.

Decision Bodies for this Project

Yukon government

Project

Project Name	Faro Generating Station Capacity Expansion Project	YESAB File Number	2021-0115
Proponent Name	Travis Ritchie		
Company Name	Yukon Energy Corporation		

Project Description

Project Scope - Summary

The proposed Project is the amendment of the existing Air Emissions Permit (Permit No. 60-010) for the Faro Generating Station (FGS) to increase the operational capacity of the existing diesel electricity generators from 10.6MW to 15.5 MW. The project is located within the community of Faro and within the Traditional Territories of Ross River Dena and Liard First Nation. The amendment will allow operation of any combination of existing generators and six of seven additional temporary rental diesel units to a total operational site capacity of 15.5 MW.

The maximum permit term under the Environment Act is 10 years, as such the Designated Office will assess the Project over a 10-year temporal scope of assessment, with an end date of 2031.

Project Scope - Activities

[not yet available]

Decision Bodies for this Project

Consolidated Decision Document	Not Applicable
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First Nations Consultation

Liard First Nation

Ross River Dena Council

A. Consultation under YESAA section 74(2) Yes

Yukon Government (YG) sent decision phase consultation letters to the Ross River Dene Council (RRDC) and Liard First Nation (LFN) on December 10, 2021. The intent of this consultation was to notify the respective First Nations that YESAB has issued their recommendation and invite them to continue consultation with YG during the decision making process on this project. A response was not received by either First Nation and no comments were submitted to YESAB during the public comment period on this project.

B. First Nations Consultation - General

N/A

Yukon Environmental and Socio-economic Assessment Act

Decision Document

YESAB Recommendation

Under s. 56(1)(b) of the *Yukon Environmental and Socio-economic Assessment Act*, the Watson Lake Designated Office recommends to the Decision Bodies that the Project be allowed to proceed, subject to specified terms and conditions. The Designated Office determined that the Project will have significant adverse environmental and socio-economic effects in or outside Yukon that can be mitigated by those terms and conditions.

Decision

Pursuant to section 75 and 80, the Yukon government has considered the assessment of this project and:

- Accepts the recommendation and the terms and conditions as follows:
- Rejects the recommendation and the terms and conditions as follows for the reason(s) specified:
- Varies the recommendation and the terms and conditions as follows for the reason(s) specified:

Rationale for Decision

After giving full and fair consideration to the Evaluation Report and supporting information, including the scientific information, traditional knowledge and other information provided with the recommendation contained in the Evaluation report, the Decision Body varies the recommendation and the terms and conditions of the Watson Lake Designated Office.

Yukon Environmental and Socio-economic Assessment Act

Decision Document

Term	Term & condition	Status	Reason
1	<p>YESAB: The Proponent shall develop, in discussion with regulators, a suitable air quality monitoring plan and schedule, to ensure that air emissions comply with the applicable standards. a. The results of monitoring shall be analyzed by comparing measured air contaminant emissions to Yukon Ambient Air Quality Standards. If air contaminant levels are found to exceed ambient air quality standards, the Proponent shall implement corrective measures to ensure that standards are met. b. The monitoring and analysis results shall be made available to Government of Yukon, Environment.</p> <p>NEW Term: The Proponent's air emissions permit application shall be subject to a technical review by the regulator. Results of the technical review may require the Proponent to submit an air emissions management plan for review and approval. The management plan should outline appropriate monitoring, mitigation and management actions to reduce, control and mitigate air emissions from the Faro generating station.</p>	Change	The permit application will be subject to a technical review as part of the regulatory review process. Based on the results of the technical review the Proponent may be subject to air quality monitoring and mitigation measures to decrease emission values to within acceptable limits as identified by the 2025 Yukon Ambient Air Quality Standards.
2	<p>YESAB: The Proponent shall install a Complaint Management System and install signage at the Faro Generating Station with contact details for concerns/complaints. If noise complaints are received, an acoustic audit shall be performed consisting of onsite measurements. Once complete, the Proponent shall share the results with the Regulator, and if required, work with the Regulator to determine additional measures to be installed to reduce noise.</p> <p>NEW Term: The Proponent shall maintain a Complaint Management System and install signage at the Faro Generating Station with contact details for concerns/ complaints. The Complaint Management System shall include a process for community engagement, noise monitoring and mitigation measures, and dispute resolution. If ongoing noise complaints are received, the Proponent shall use the established process to work with the community to resolve noise related concerns resulting from the expansion of the Faro Generating Station. The Proponent shall share outcomes from the Complaint Management System with the regulator as a component of their annual report.</p>	Change	Term varied to clearly identify the Proponent's responsibility for community engagement related to noise levels with the increased capacity at the Faro generation station.
3	<p>YESAB: The Proponent shall ensure noise control measures for each rental generator (i.e. silencers/mufflers, acoustic linings or acoustic enclosures) are installed and in good working condition at all times.</p>	Agree	--

Date

Project Recommendation Issued 2021-12-07

Recommendation Received From

Designated Office - Watson Lake

Yukon Environmental and Socio-economic Assessment Act Decision Document

Authority

By signing below, the Yukon government has exercised its authority as per YESAA section 75 to issue a decision document on this project.

Name Bryna Cable

Position Director Environmental Protection and

Phone (867) 667-5683

Email Bryna.cable@yukon.ca

Signature 

Date Jan. 18/22

Original signed by Environment

Distribution

Project Proponent	Yes
Other Decision Bodies	No
Major Projects Yukon, Executive Council	Yes
YESAB Designated Office	Yes
YESAB Executive Committee	No
Yukon Surface Rights Board	No
Yukon Water Board	No
Land Use Planning Commission	
Independent Regulatory Agency	
Other Body/Person as Required	

From: [Travis Ritchie](#)
To: Sarah.Preiksaitis@yukon.ca
Subject: RE: Updated permits and emergency capacity authorization
Date: May 11, 2022 11:54:00 AM
Attachments: [image001.png](#)

Thanks Sarah.

From: Sarah.Preiksaitis@yukon.ca <Sarah.Preiksaitis@yukon.ca>
Sent: May 11, 2022 11:18 AM
To: Travis Ritchie <Travis.Ritchie@yec.yk.ca>
Subject: RE: Updated permits and emergency capacity authorization

Hi Travis,

Please see the updated permit for Faro. Under part 5 “monitoring” the number of monitoring locations has been updated. I can also confirm that a permit amendment may be made if you change from rental to permanent diesel generators.

I will have the signed copies of the permits for all the sites for you shortly.

Thank you,



Sarah Preiksaitis
Environmental Protection Analyst
Environment | Standards and Approvals
T 867-667-5456 | Yukon.ca

From: Sarah.Preiksaitis
Sent: May 4, 2022 8:49 AM
To: 'Travis Ritchie' <Travis.Ritchie@yec.yk.ca>
Cc: Jennifer.Dagg <Jennifer.Dagg@yukon.ca>
Subject: RE: Updated permits and emergency capacity authorization

Hi Travis,

If you have any questions please let me know. Otherwise we will send over signed copies of the permits shortly.

Thank you,



Sarah Preiksaitis
Environmental Protection Analyst
Environment | Standards and Approvals
T 867-667-5456 | Yukon.ca

From: Sarah.Preiksaitis
Sent: April 21, 2022 9:38 AM
To: 'Travis Ritchie' <Travis.Ritchie@yec.yk.ca>
Cc: Jennifer.Dagg <Jennifer.Dagg@yukon.ca>
Subject: Updated permits and emergency capacity authorization

Hi Travis,

Attached are the updated permits for all sites. I've adjusted to WRGD MW to 16.15MW as you correctly noted. Given the discrepancy regarding the identification of the number of generators I re-added the number of units for all sites. This further clarifies the capacities approved for each site and prevents any confusion. We have received ongoing inquiries from the public in regards to the use and capacities of the diesel generators, at Faro and Whitehorse specifically, and the intention is to avoid any confusion regarding authorized capacities.

I shared with Jenn Dagg your note regarding our authority as a decision body to determine whether a decision document is needed before approval and authorization. You are correct that we have some ability to determine what constitutes a change in scope to a project. However, YESAA, its regulations, and the Air Emissions regulation identify thresholds for assessment and permitting based on MWs. The change you are proposing is beyond the MW thresholds requiring assessment and authorization, so there is no flexibility in this case. Because item 49.1 was revoked from the YESAA Act, the previous decision-making process is not a precedent in this case.

We cannot authorize the extension of the 12MW of emergency capacity and I recommend you to reach out to YESAB immediately to discuss options for assessment.

Thank you,



Sarah Preiksaitis
Environmental Protection Analyst
Environment | Standards and Approvals
T 867-667-5456 | Yukon.ca



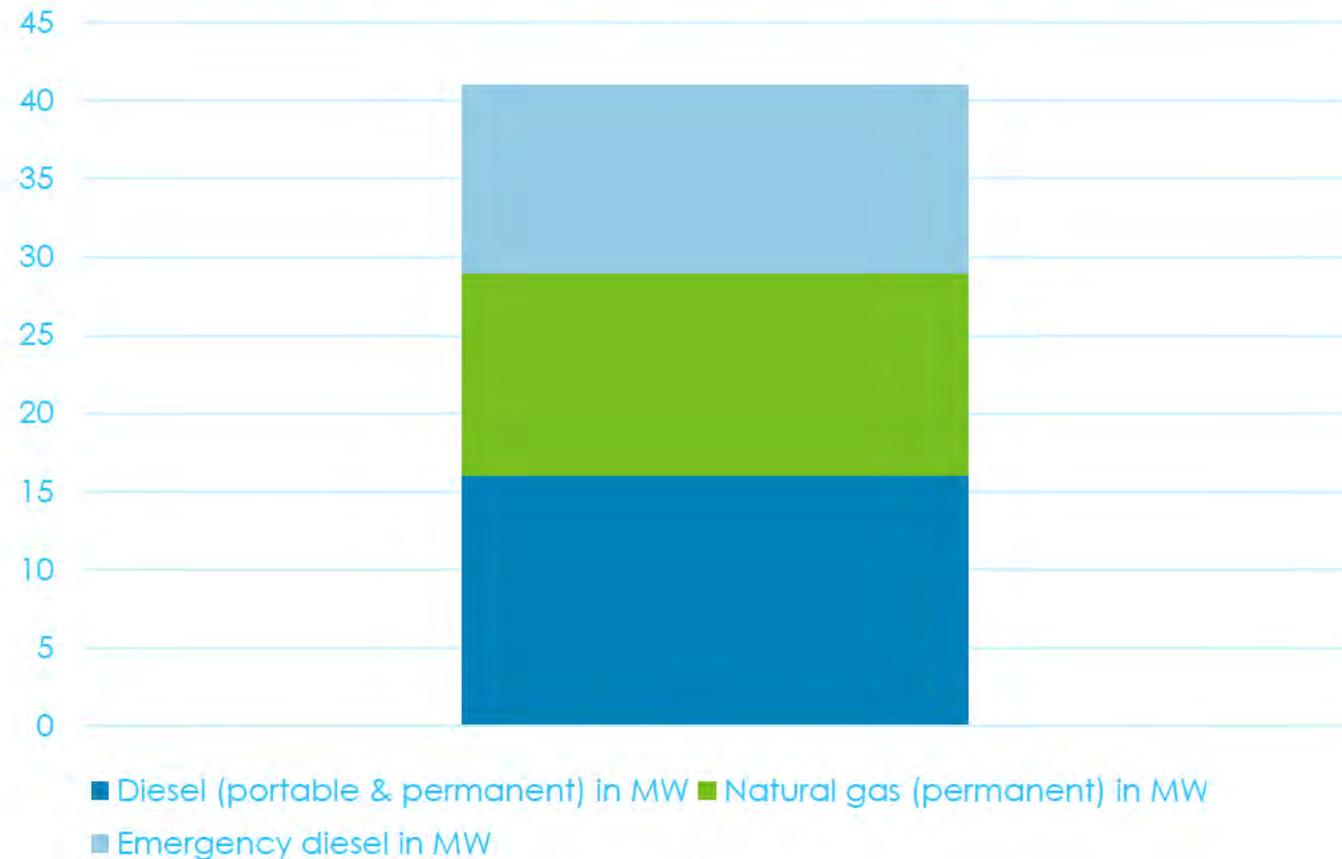
Whitehorse Thermal Permitting

November 2022

The project

- Seeking renewal of existing permit for thermal generation in Whitehorse
- Air quality and noise impact assessments

Air emissions permit in Whitehorse





Engagement Plan

Goals

- Create understanding about why permitting is necessary
- Educate Whitehorse residents on the role thermal plays in the Yukon
- Inform Whitehorse residents about Yukon Energy's 10-Year Renewable Electricity Plan and plans to reduce thermal use

Executive Committee screening

- Yukon Energy must provide:
 - sufficient detail about project
 - enough time to prepare feedback
 - opportunity to present views to YEC
- Yukon Energy must consider feedback when developing application

Audience



Timeline

	November	December	January	February
Engage w/ First Nations				
Engage w/ CofW, YG				
Engage with stakeholder groups				
Mailer to Whitehorse				
Letter to Riverdale residents (2 km)				
Door knocking in Riverdale (800 m)				
Public open house (in-person & virtual)				
Feedback period closes				



Questions?



#2 Miles Canyon Road
Box 5920, Whitehorse
Yukon Y1A 6S7

yukonenergy.ca

December 2022,

Dear Property or Business Owner;

Re: Yukon Energy Whitehorse Thermal Permit Renewal

As part of our ongoing work to provide Yukoners with sustainable, reliable and cost-effective electricity, Yukon Energy will be submitting a proposal to renew its existing air emissions permit in Whitehorse. This permit is needed to run the diesel and liquefied natural gas (LNG) generators at the Whitehorse Rapids Generating Station on Robert Service Way.

You are receiving this letter because you own property near the Whitehorse Rapids Generating Station. As a property owner in the area, we wanted to share details about this project and to invite you to provide feedback.

Why is diesel and LNG (thermal) being used?

While these generators are used to produce less than 10% of the electricity Yukoners use each year, they are critical to helping Yukon Energy keep the lights on and houses warm during the winter, when demand for electricity is high.

Will you be adding more thermal capacity?

No, we are not asking to add more thermal capacity in our proposal.

What about noise?

Over the years, we've heard that public safety, noise, air quality and sustainability are your primary interests when it comes to Yukon Energy's work. We want to assure you that in renewing this permit, we are keeping these considerations top-of-mind. As part of the assessment process, we are conducting both air quality and noise impact studies.

We continue to monitor sound levels from the permanent diesel generators in Whitehorse to ensure levels are lower than permissible levels.

We will continue to monitor these levels and share the results when they are available.

What's next?

From now until the end of January, we will be carrying out engagement about the project. Please do not hesitate to reach out with questions or to provide your feedback. There are several ways that you can get involved.

Community meetings

Two community meetings have been planned to share information and answer your questions.

- On-line meeting: Tuesday, January 17th, at 7 p.m., see the project website for the meeting link
- In-person meeting: Thursday, January 19th, 6:30 - 8:30 p.m. at the Heart of Riverdale Community Centre

Submit a question or comment

You can submit a question or comment by:

- Filling out the online form at www.yukonenergy.ca/thermalpermit
- E-mailing YECWhitehorseThermalPermit@stantec.com

Feedback on the project will be collected until January 27, 2023 and will be used to help us refine our proposal to renew our air emissions permit.

For more information about the project and Yukon Energy's plans for the future, please visit: www.yukonenergy.ca/thermalpermit

Thank you in advance for your time; we look forward to hearing from you.

Regards,



Lisa Wiklund

Communications Manager, Yukon Energy



#2 Miles Canyon Road
Box 5920, Whitehorse
Yukon Y1A 6S7

yukonenergy.ca

January 2023,

Dear Property or Business Owner;

Re: Yukon Energy Whitehorse Thermal Permit Renewal

In December of 2022, you should have received a letter with information about Yukon Energy's thermal (LNG and diesel) permitting project and how to provide your feedback about the project.

If you did not receive our first letter, a description of the project can be found below or at yukonenergy.ca/thermalpermit.

We would like to let you know that the community meetings originally scheduled for January 17, 2023, and January 19, 2023, have been rescheduled. The in-person meeting has been rescheduled to March 29, 2023, and the online meeting to March 27, 2023.

These meetings have been rescheduled so that we can share up-to-date project details with you. It will also allow us more time to complete sound and air quality studies, the results of which we know are important to you. This information will then help us to have more informed conversations at the community meetings.

What is Yukon Energy's thermal permitting project?

As part of our ongoing work to provide Yukoners with sustainable, reliable, and cost-effective electricity, Yukon Energy will be submitting a proposal to the Yukon Environmental and Socio-economic Assessment Board (YESAB) to renew its existing air emissions permit in Whitehorse. This permit is needed to run the diesel and liquefied natural gas (LNG) generators at the Whitehorse Rapids Generating Station on Robert Service Way. We are not asking to add more thermal capacity in our proposal.

While these generators are used to produce less than 10% of the electricity Yukoners use each year, they are critical to helping Yukon Energy keep the lights on and houses warm during the winter when demand for electricity is high.

Get involved

There are several ways that you can get involved. Please do not hesitate to reach out with questions or to provide your feedback.

Community meetings

Two community meetings have been planned to share information and answer your questions.

- Online meeting: March 27, 2023, from 6:00 to 7:30 pm, see the project website for the meeting link

- In-person meeting: March 29, 2023, from 6:30 to 8:30 pm at Grey Mountain Primary School Gym

Submit a question or comment

You can submit a question or comment by:

- Filling out the online form at www.yukonenergy.ca/thermalpermit
- E-mailing YECWhitehorseThermalPermit@stantec.com

Feedback received will be used to help us refine the proposal to renew our air emissions permit.

For more information about the project and Yukon Energy's plans for the future, please visit: www.yukonenergy.ca/thermalpermit

Thank you in advance for your time; we look forward to hearing from you.

Regards,



Lisa Wiklund

Communications Manager, Yukon Energy