From: <u>Emily.Sessford</u>

To: <u>Travis Ritchie</u>; <u>Elizabeth.Barker</u>

Cc: <u>Gary Jones</u>; <u>Attilla Heipel</u>; <u>Shannon Mallory</u>; <u>Cody Hoy</u>

Subject: RE: [EXT] RE: 2023-038-Inspection-Report

Date: June 1, 2023 1:11:51 PM

Attachments: <u>image002.png</u>

image003.png image004.png image005.png image006.png image007.png

Hi Travis,

Thank you for the response. I have commented on each in green below.

The corrective actions with regards to Inspection Report 2023-038 at the Faro Generating Station I consider complete, however, I will follow-up with corrective action 2 again on my next site inspection, to ensure this training is occurring. Please continue to work with Standards & Approvals for any permit concerns or amendments.

Appreciate your time and attention to this.

Sincerely,



Emily Sessford

Environmental Compliance Officer
Environment | Environmental Compliance & Inspections
T 867-667-5398 | C 867-332-2945 | Yukon.ca

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

Sent: May 31, 2023 4:54 PM

To: Emily.Sessford <Emily.Sessford@yukon.ca>; Elizabeth.Barker <Elizabeth.Barker@yukon.ca> **Cc:** Gary Jones <Gary.Jones@yec.yk.ca>; Attilla Heipel <Attilla.Heipel@yec.yk.ca>; Shannon Mallory

<Shannon.Mallory@yec.yk.ca>; Cody Hoy <Cody.Hoy@yec.yk.ca>

Subject: [EXT] RE: 2023-038-Inspection-Report

Hello Emily and Elizabeth,

Thank you for the inspection report (re. AEP 60-010-01 - Faro Generating Station).

Pursuant to the corrective/follow up actions outlined in the report, I offer the following information for your consideration:

YG Corrective Action 1:

Permittee is requested to follow-up regarding site changes, this includes decommissioning of generator FD-1, and the change in location of generators YM26-T1, YM25-T1, YM24-T1 and YM22-T1, as well as any other anticipated development or changes that may be occurring as required by permit.

YEC Response CA1:

Yukon Energy will provide a schedule and description of activities related to the decommissioning of FD1 for approval prior to removal of this source from the FGS property. We hope that since this source is being removed and will no longer be making emissions to air that the requisite approval can be reasonably provided under the existing YESAA Decision Document for the facility. **Thank you, Standards & Approvals will be the main point of contact for this.**

As regards any changes in the location of emissions sources, we ask for your consideration that such an approval is not required when such activities are occurring within the site boundary of a permitted thermal generating station. Part 2, Clause 5(b) of the current FGS air emissions permit appears to be an inadvertent holdover from previous versions of the authorization when all of Yukon Energy's thermal generating stations were authorized under a single (or blanket) air emissions permit. Yukon Energy has always had periodic operational requirements to move mobile generators from one facility to another and it was in this context, and that of a blanket permit, that necessitated the need for such a clause in past permits. An operational need for YEC to make minor adjustments to the location of generators within an individual facility boundary would not be reasonably expected to materially vary the character of the pollutant emissions from the site in a negative way and therefore we request that, in interpreting the permit, such activities not be subject to prior approval from the Regulator. YEC will certainly continue to request approval for changes in the location of sources between generating stations.

Appreciate the context and clarity you have provided. I do agree, that in these situations, the permit requirement for approval and notification may not be reflective of its original intention nor be relevant to the current process. Please continue to work with Liz at Standards & Approvals for any amendments to the permit regarding this concern.

YG Corrective Action 2:

Permittee is requested to brief and make operators aware of the full complaint management system in place.

YEC Response CA2:

The approved Complaint Management System for the FGS includes facility-based signage and website information for the public to phone, email, or submit online complaints to the Corporation. The receipt and management of such correspondence is made by YEC's External Affairs Department and is triaged as required to satisfy the requirements of the plan and interests of our stakeholders. The inspection findings have, however, made us more aware that as members of the community our facility operators may receive complaints via direct engagement with complainants and it would be

useful for them to be able to relay details of how to effectively share such complaints with the Corporation (i.e., to verbally share the information about how to register a complaint via phone, email, or online).

As such, on or before June 30, 2023, Yukon Energy Environment Department staff will provide an orientation to relevant members of its Operations Team as to the scope and function of the Complaint Management System in place for the Faro Generating Station (FGS). We will also make such awareness training a mandatory part of orientations for new/temporary plant operators at the FGS.

The proposed orientation and training above is adequate.

If you have any follow up questions, comments, or concerns with these responses to the required corrective actions please let me know.

Thank you.

Regards,

Travis



Travis Ritchie

Director, Risk & Compliance

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



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Please consider the environment before printing this e-mail

From: Emily.Sessford@yukon.ca>

Sent: May 16, 2023 1:21 PM

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

Cc: Elizabeth.Barker <<u>Elizabeth.Barker@yukon.ca</u>>; Gary Jones <<u>Gary.Jones@yec.yk.ca</u>>; Attilla

Heipel <<u>Attilla.Heipel@yec.yk.ca</u>>

Subject: 2023-038-Inspection-Report

Good afternoon Travis,

Please find attached Inspection Report 2023-038 for Yukon Energy Corporation's Air Emissions Permit No: 60-010-01 at Faro. Please note the corrective actions and associated deadlines.

Sincerely,



Emily Sessford
Environmental Compliance Officer
Environment | Environmental Compliance & Inspections
T 867-667-5398 | C 867-332-2945 | Yukon.ca



From: Elizabeth.Barker
To: Travis Ritchie
Cc: Emily.Sessford

Subject: RE: [EXT] RE: 2023-038-Inspection-Report

Date: May 31, 2023 1:38:07 PM

Attachments: <u>image002.png</u>

image003.png image004.png image005.png image006.png image007.png

Hi Travis, I'm free anytime after 3, give me a call whenever you have a chance.

Chat soon,

Liz

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

Sent: May 31, 2023 1:02 PM

To: Elizabeth.Barker <Elizabeth.Barker@yukon.ca> **Cc:** Emily.Sessford <Emily.Sessford@yukon.ca> **Subject:** [EXT] RE: 2023-038-Inspection-Report

Hi Liz,

Thanks for your follow up call. A chat with you directly would be fine. We can relay outcomes to Emily afterward.

I am available for a call after 3 pm today if that suits you.

Let me know and I will give you a call when it works for you.

Regards,

Τ



Travis Ritchie

Director, Risk & Compliance

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



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From: Travis Ritchie

Sent: May 31, 2023 9:11 AM

To: 'Emily.Sessford' < Elizabeth.Barker < Elizabeth.Barker@yukon.ca>

Subject: FW: 2023-038-Inspection-Report

Good Morning,

I was wondering if you might have some time to review this inspection report before Yukon Energy provides a response. There are a few items that I think would be good to explore if you have some time. I can set up a quick meeting to suit your schedules if this works.

Thanks for your consideration.

Regards,

Travis

From: Emily.Sessford@yukon.ca>

Sent: May 16, 2023 1:21 PM

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

Cc: Elizabeth.Barker <<u>Elizabeth.Barker@yukon.ca</u>>; Gary Jones <<u>Gary.Jones@yec.yk.ca</u>>; Attilla

Heipel Attilla.Heipel@yec.yk.ca **Subject:** 2023-038-Inspection-Report

Good afternoon Travis,

Please find attached Inspection Report 2023-038 for Yukon Energy Corporation's Air Emissions Permit No: 60-010-01 at Faro. Please note the corrective actions and associated deadlines.

Sincerely,



Emily Sessford

Environmental Compliance Officer Environment | Environmental Compliance & Inspections T 867-667-5398 | C 867-332-2945 | Yukon.ca



From: <u>Travis Ritchie</u>
To: <u>Emily.Sessford</u>

Cc: <u>Elizabeth.Barker; Gary Jones; Attilla Heipel</u>
Subject: [EXT] RE: 2023-038-Inspection-Report

Date: May 17, 2023 9:46:35 AM

Attachments: image001.png

imagea7f74a.PNG image8e048a.PNG image49d2e9.PNG image3d2986.PNG image9cb607.PNG

Thanks for your report Emily.

We will review the findings and address any corrective actions pursuant to deadlines you specify.

Regards,

Travis



Travis Ritchie

Director, Risk & Compliance

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





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A

Please consider the environment before printing this e-mail

From: Emily.Sessford < Emily.Sessford@yukon.ca>

Sent: May 16, 2023 1:21 PM

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

Cc: Elizabeth.Barker <Elizabeth.Barker@yukon.ca>; Gary Jones <Gary.Jones@yec.yk.ca>; Attilla

Heipel <Attilla.Heipel@yec.yk.ca> **Subject:** 2023-038-Inspection-Report

Good afternoon Travis,

Please find attached Inspection Report 2023-038 for Yukon Energy Corporation's Air Emissions Permit No: 60-010-01 at Faro. Please note the corrective actions and associated deadlines.

Sincerely,



Emily SessfordEnvironmental Compliance Officer Environment | Environmental Compliance & Inspections T 867-667-5398 | C 867-332-2945 | Yukon.ca



From: Emily.Sessford
To: Travis Ritchie

Cc: <u>Elizabeth.Barker</u>; <u>Gary Jones</u>; <u>Attilla Heipel</u>

 Subject:
 2023-038-Inspection-Report

 Date:
 May 16, 2023 1:20:00 PM

Attachments: <u>image001.png</u>

image001.png 20230510-Inspection-report-es.pdf

Good afternoon Travis,

Please find attached Inspection Report 2023-038 for Yukon Energy Corporation's Air Emissions Permit No: 60-010-01 at Faro. Please note the corrective actions and associated deadlines.

Sincerely,



Emily Sessford

Environmental Compliance Officer Environment | Environmental Compliance & Inspections T 867-667-5398 | C 867-332-2945 | Yukon.ca





Environment Act INSPECTION REPORT

Permit No.: 60-010-01

Inspection Report No.: 2023-038

| Assessment Branch | | | | | | | | | | |
|---|---|------------|-----|--|-----------|---------|------|-----------------------------------|-----------|----------|
| GENERAL INFORMATION | | | | | | | | | | |
| PERMITTEE: | | | | | | | | | | |
| Yukon Energy Corp | ooration | | | | | | | | | |
| PERSON CONTAC | CTED: | | A | CCOMPANIED B | Y: Gary. | JONES | II | NSPECTED BY: | | |
| Gary JONES & Trav | vis RITCI | HIE | Δ | ttila HEIPEL | | | E | mily SESSFORD | & Liz BA | ARKER |
| MAILING ADDRES | SS: Box ! | 5920, W | nit | ehorse, YT Y1A 69 | 57 | | | | | |
| | | | | | | | | | | |
| LOCATION: 413 C | Campbell | Street, F | ar | o, YT Y0B 1K0 | | | | | | |
| INSPECTION DAT | E & TIM | E: | Р | ERMIT EXPIRY D | ATE: | | L | AST INSPECTED |): | |
| May 10, 2023 12 | :00 | | | ecember 31, 203 | 1 | | 0 | ctober 14, 2022 | | |
| | | | | PERMIT | TYPE | | | | | |
| □ Air Emissions | | | | Ministerial Authoria | zation | | | Solid Waste Mana | igement | |
| ☐ Beverage Containe | ers | | | Pesticides | | | | Special Waste | | |
| ☐ Designated Materi | | | | Relocation | | | | . 3 | | |
| ☐ Land Treatment Fa | acility | | | Risk-Based Restor | ation | | | Halocarbons | | |
| | | | | INSPECTED A | CTIVITIES | | | | | |
| CONDITIONS: A – Acceptable C – Concerns U – Unacceptable N/A – Not Applicable N/I – Not Inspected | | | | | | | | | | |
| Activities | Condition | Comment | 4 | Activities Management of | Condition | Comment | • | Activities | Condition | Comment |
| Closure/ Decommissioning | U | *1 | | Contaminated Water | N/A | | | Signage & Segregation | N/A | |
| Construction | N/A | | | Opacity | N/A | | | Site Conditions | N/A | |
| Emissions Monitoring | Α | *3,*7 | | Pesticide Appendix | N/A | | | Soil Handling & Stockpiling | N/A | |
| Facility Maintenance | Α | *2 | | Pesticide Application | N/A | | | Spills | Α | *7 |
| Facility Operations | Α | *2 | | Pesticide Applicator Certifications | N/A | | | Storage & Disposal | N/A | |
| Facility Specifications | N/A | | | Pesticide Transportation | N/A | | | Storage & Handling | N/A | |
| Fencing & Security | N/A | | | Release of Contaminants | Α | | | Testing & Emissions Management | Α | |
| Incineration/ Burning | N/A | | | Relocation of Contaminated Material | N/A | | | Transport & Transfer | N/A | |
| Inspections, Record Keeping & Reporting | С | *1,*5,*6*8 | | Removal of Remediated Soil | N/A | | | Unauthorized Emissions | Α | *4,*7 |
| Cell coverage N/A Sampling & Analysis N/A Other | | | | | | | | | | |
| ENFORCEMENT ACTION | | | | | | | | | | |
| □ Written Warn | ing | | [| ☐ Inspector's Dir | ection | | X | Non-Compliar | ice | |
| INSPECTION COMMENTS | | | | | | | | | | |
| On May 10, 2022 | On May 10, 2023, the undersigned officer along with Liz BARKER. Environmental Protection Analyst with | | | | | | | | | |
| TUTIVIAV TU 707.5 | THE UNG | r Sianea | OH? | uceraiono wim 112 | OAKKE | | 1111 | Denial Frotectio | T AHAIVST | . vviiii |

On May 10, 2023, the undersigned officer along with Liz BARKER, Environmental Protection Analyst with Standards & Approvals, conducted an inspection of air emissions permit 60-010-01 site location 413 Campbell Street, Faro, Yukon. At time of inspection no generators were in operation and all electricity was being generated via hydro.

Scope of Authorization

 Permittee is authorized to operate electricity generating equipment at the site noted on permit, to a site capacity of 15.5MW as set out in the terms and condition of this permit.

General*1

- Permittee is compliant with condition 2.3 to 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.
 - o On inspection, (a) a copy of this permit is posted in the main office; (b) personnel were all aware of permit and (c) applicable training in provided by Yukon Energy.

| INSPECTOR | RECEIVED BY |
|------------------------------|---------------|
| Signature: | Signature: |
| Printed Name: Emily Sessford | Printed Name: |

Permit No.: 60-010-01



Environment Act INSPECTION REPORT

Inspection Report No.: 2023-038

Environmental Protection and Assessment Branch

- Permittee has failed to meet condition 2.5 to obtain approval from an environmental protection analysts
 prior to: (a) any additional, 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).
 - o It was noticed on inspection that generator FD-1 is in the process of being decommissioned.
 - indication was made that this generator in the upcoming years may be decommissioned as noted in Inspection Report 2022-068, however no notification of this occurring was ever received by Environmental Protection & Assessment Branch nor was any approval by the Branch given.
 - Site inspection indicated that 4 of the rental generators (YM26-T1, YM25-T1, YM24-T1 and YM22-T1) had been move from location and construction to set them up in another location was underway. (Figure:1)

Operation and Maintenance*2

- Permittee is compliant with condition 3.1 to operate any combination of the two permanent diesel generators and six rental diesel generators to a site capacity of 15.5MW of power.
 - There was six rental generators marked as YM20, YM11, YM26-T1, YM25-T1, YM24-T1 and YM22-T1. All rental generators are 1.8MW max energy output.
 - > There is an alarm system in place if capacity of generators is been reached, this can be monitored by SCC (system control center) in Whitehorse.
 - There is one permanent generator in operation FD-7.
- Permittee is reminded of condition 3.2, to in accordance with the manufacturer's recommendations and best management practices, to inspect, maintain and operate the sources, and 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.
- Permittee appears to be in compliance with condition 3.4 to 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.
 - As confirmed on previous inspection (Report#2022-068), Ultra low Sulphur fuel is used. Winter fuel
 is burnt all year round and is supplied by North of 60.

Release of Contaminants*3

- Permittee at time of inspection was compliant with 4.1 and 4.2 with regards to emissions and opacity.
 - On inspection no visible emissions where observed.
- Condition 4.3 states that 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.
 - Previous inspections of Yukon Energy have indicated that: the only control equipment used is that which is installed by the manufacturer.

Monitoring Emissions*4

- Permittee has reached compliance with conditions 5.1 to submit a monitoring plan for NO₂ to the environmental protection analyst.
 - It has been confirmed with environmental protection analyst that documentation was submitted October 2022.

| INSPECTOR | RECEIVED BY |
|-------------------------------|---------------|
| Signature: January Signature: | Signature: |
| Printed Name: Emily Sessford | Printed Name: |



Environment Act INSPECTION REPORT

Permit No.: 60-010-01

Inspection Report No.: 2023-038

Environmental Protection and Assessment Branch

Any follow-up required based on what was submitted with regards to part 5 of permit will initially be through the environmental protection analyst.

Complaint Management System*5

- Permittee has reached aspects of compliance condition 6.1 (a-f) and 6.2 (a-b) with regards to the Complaint Management System. As noted in 2.9 of permit "all conditions of this permit must be met within 90 days of the permit effective date".
 - The Complaint Management System has been reviewed and approved by an Environmental Protection Analyst.
 - It was noted on inspection that the operator were not aware of the Complaint Management procedure in place.

Reporting*6

- Permittee is compliant with condition 7 (a-d) with regards to reporting.
 - Annual report was submitted to an Environmental Protection Analysts on March 31st 2023.

Unauthorized Emissions*7

- Permittee appears to be compliant with condition 7.1 with regards to unauthorized emissions, and reporting.
 - o JONES said there have been no unauthorized releases and that they have internal protocols for any spills that occur.
 - Reported spill 22-056 is still in the process of being remediated as ground is still frozen. (Figure:
 2)

Records*8

Records as required in condition 8.2 are mainly kept at the Whitehorse main SCC.

Corrective Action/Follow-up

- Permittee is requested to follow-up with regards to site changes, this includes decommissioning of generator FD-1, and the change in location of generators YM26-T1, YM25-T1, YM24-T1 and YM22-T1, as well as any other anticipated development or changes that may be occurring as required by permit. Please follow up with Elizabeth Barker, environmental protection analyst at Elizabeth.Barker@yukon.ca.
- 2. Permittee is requested to brief and make operators aware of the full complaint management system in place.

Please follow up with Elizabeth Barker, environmental protection analyst at Elizabeth.Barker@yukon.ca for Corrective action #1 no later than May 30th 2023.

Please provide confirmation of corrective action 2 with Emily Sessford, Environmental Compliance

Officer at emily.sessford@yukon.ca no later than May 30th 2023.

| INSPECTOR | | | | |
|------------------------------|--|--|--|--|
| Signature: Garly Just 1 | | | | |
| | | | | |
| Printed Name: Emily Sessford | | | | |

| ı | RECEIVED BY |
|---|---------------|
| ľ | KECLIVED DI |
| | Signature: |
| | Printed Name: |



Environment Act INSPECTION REPORT

Permit No.: 60-010-01

Inspection Report No.: 2023-038

Environmental Protection and Assessment Branch



Figure 1: Site of 4 new rental generators.



Figure 2: Spill 22-056 area.

| | INSPECTOR | |
|--------------------|-------------------|--|
| Signature: | Guildhorft | |
| | 1/// | |
| Printed Nam | e: Emily Sessford | |

| RECEIVED BY | |
|---------------|--|
| Signature: | |
| Printed Name: | |

 From:
 Elizabeth.Barker

 To:
 Emily.Sessford

 Subject:
 RE: Faro-YEC-Inspection

Date: May 15, 2023 10:40:57 AM

Attachments: <u>image001.pnq</u>

Hey Emily,

See my notes in purple below. Give me a shout if anything is not adding up to what you have in your notes, especially that additional generator comment.

Thanks,

Liz

From: Emily.Sessford@yukon.ca>

Sent: May 11, 2023 4:24 PM

To: Elizabeth.Barker < Elizabeth.Barker@yukon.ca>

Subject: Faro-YEC-Inspection

Hi Liz.

Just writing up the Inspection Report from Faro YEC! I have a couple conditions I wanted to confirm with you.... I have copied them below. I have highlighted the parts I need confirmed, the rest is just for getting the bigger picture. Much appreciated!

- Permittee has failed to meet condition 2.5 to obtain approval from an environmental protection analysts prior to: (a) any additional, 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).
 - It was noticed on inspection that generator FD-1 is in the process of being decommissioned.
 - indication was made that this generator in the upcoming years may be decommissioned as noted in Inspection Report 2022-068, however no notification of this occurring was ever received by Environmental Protection & Assessment Branch. Correct, we did not receive notification or give approval.

Site inspection indicated that 4 of the rental generators (YM26-T1, YM25-T1, YM24-T1 and YM22-T1) had been move from location and construction to set them up in another location was underway. (Figure) we did not receive notification or give approval about the new locations of YM26-T1, YM25-T1, YM24-T1 and YM22-T1.

0

- ➤ It is also understood that another generator is intended to be installed at the south-west end of property. As noted in inspection report 2022-068, permittee is reminded that a permit amendment must be obtained prior to adding generators beyond the currently installed capacity. At time of inspection, permittee has not submitted any requests for the additional generator. As Lunderstand it they will be adding two new permanent generators that together add up to the same capacity as ED1 so technically they will not be adding more capacity just replacing it. It could still be worth reminding them about condition 2.5, to get approval before bringing the new generators onsite.
- Permittee has reached compliance with conditions 5.1 to submit a monitoring plan for

NO₂ to the environmental protection analyst.

- o It has been confirmed with environmental protection analyst that documentation was sent in October 2022. Yes the plan was submitted in Oct 2022
 - Any follow-up required based on what was submitted with regards to part 5 of permit will initially be through the environmental protection analyst.

Complaint Management System*5

- Permittee has reached aspects of compliance condition 6.1 (a-f) or 6.2 (a-b) with regards to the Complaint Management System. As noted in 2.9 of permit "all conditions of this permit must be met within 90 days of the permit effective date"
 - The Complaint Management System has been reviewed and approved by an Environmental Protection Analyst. yes the plan has been reviewed and approved.
 - It was noted on inspection that the operator were not aware of the Complaint Management procedure in place.

Reporting*6

- Permittee is compliant with condition 7 (a-d) with regards to reporting.
 - Documents were submitted to an Environmental Protection Analysts on

_____>? we received the annual report on March 31st.



Emily Sessford

Environmental Compliance Officer
Environment | Environmental Compliance & Inspections
T 867-667-5398 | C 867-332-2945 | Yukon.ca

From: <u>Elizabeth.Barker</u>
To: <u>Travis Ritchie</u>

Subject: RE: [EXT] RE: Complaint Management Plan Comments

Date: March 28, 2023 10:31:00 AM

Attachments: <u>image003.png</u>

image004.png image005.png image006.png image007.png image008.png image009.png

Good Morning Travis,

Thanks for your responses to my questions regarding the Complaint Management Plan. I am satisfied with the responses provided so please go ahead and finalize the plan.

Thanks and have a great day,

Liz

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

Sent: February 13, 2023 1:51 PM

To: Elizabeth.Barker < Elizabeth.Barker@yukon.ca>

Subject: [EXT] RE: Complaint Management Plan Comments

Hi Liz,

Just one quick follow up from last week. The comms signage has been installed at Faro now (see attached).

Regards,

Travis



Travis Ritchie

Manager - Environment, Assessment, & Licensing Telephone: 867-393-5350 | Mobile: 867-333-0300



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error, please immediately reply to the sender and delete this information from your computer.

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From: Travis Ritchie

Sent: February 10, 2023 1:16 PM

To: 'Elizabeth.Barker' < <u>Elizabeth.Barker@yukon.ca</u>> **Subject:** RE: Complaint Management Plan Comments

Hi Liz,

Please forgive the delay in my reply. I have embedded some responses for your consideration below.

Happy to discuss any of this further if you like.

On a related note the signage regarding communicating with YEC regarding concerns has been produced and delivered to the FGS. If it hasn't been installed yet I expect it will be very soon. In the meantime we have updated our website to provide additional pathways for the public to share feedback with the Corporation regarding the FGS (click HERE to view).

Thanks and have a great weekend!

Regards,

Travis

From: Elizabeth.Barker <<u>Elizabeth.Barker@yukon.ca</u>>

Sent: January 24, 2023 9:18 AM

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

Subject: RE: Complaint Management Plan Comments

Good Morning Travis,

I'm just following up on the Complaints Management Plan for Faro. Have you had a chance to read through my email from December?

Thanks very much,

Liz



From: Elizabeth.Barker

Sent: December 20, 2022 3:34 PM

To: Travis Ritchie < <u>Travis.Ritchie@yec.yk.ca</u>> **Subject:** Complaint Management Plan Comments

Hi Travis,

It's been a while, I hope all is well in YEC world.

I've reviewed YEC's Complaint Management Plan and have a few questions:

1. Process for Community Engagement- there is mention of periodic public communications and events being held in the community to share information. In regards to public concerns/complaints, is there a threshold that would trigger YEC to put out a public communication or hold a community event? It's unclear how community engagement will be used when it comes to dealing with public concerns/complaints.

Response: Yes, Yukon Energy periodically engages with the Town Council and otherwise hosts or participates in community meetings. These are mostly related to new or evolving activities or projects at the generating station or are at the invitation of the Town Council. Some of these engagements have been related to citizen concerns and/or complaints. These are typically ad hoc. If there was an invitation to come to the community to have a meeting or share information we would typically seek to attend as scheduled or as soon as feasible. We don't have a defined threshold respecting public concerns or complaints that would trigger a public communication. On a case-by-case basis, we would use our best judgment and experience to ensure we were being accountable to our stakeholders when responding/addressing public concerns/complaints.

2. Noise Monitoring, Mitigation, and Control Measures- there is reference to including additional ambient sound data collection in the future. Is there a specific plan for this, including a timeline for when this data collection would occur?

Response: As part of establishing the temporary air quality monitoring station required by the air emission permit, we have voluntarily included provision for the installation of sound level monitoring and data logging equipment. I expect that system will operate for as long as is necessary to assess the measures we have in development to attempt to address the noise concerns (estimate monitoring through end of 2024 at this time). We are in the final negotiations for a site to

operate the monitoring station and hope to have it installed and commissioned in the next few months.

3. Noise Monitoring, Mitigation, and Control Measures- this section is very vague in it's explanation of what mitigations/control measures will be incorporated and a timeline for implementation. I understand YEC is still in the planning stage and therefore may not have a definite plan however I would like to know where the planning stage is currently at in regards to this (which mitigations /control measures have been researched) and when YEC is planning on incorporating the chosen mitigations/ control measures.

Response: We have used the results of the previous acoustic audits in the community and the BRITISH COLUMBIA NOISE CONTROL BEST PRACTICES GUIDELINE to define an operating permissible sound level. We are using that information to plan a reconfiguration of the unit locations and their fuel conveyance on site, replacement of older units with newer lower emitting units, and to design potential sound attenuating structures for existing units to see what can feasibly be done to address past noise complaints. The Town has extremely low ambient sound levels (in the neighborhood of 25-35 dB) and some new citizens that are not accustomed to our operations, but we are hopeful we can configure something that meets the permissible sound levels we have derived from the Guidelines and satisfy the community that we have done our best to address their concerns. The Town Council did thank us recently for our planning efforts to address this matter and for our engagement with them on same. They too are looking forward to seeing the results of our efforts to address the noise issues some citizens have raised.

4. Dispute Resolution Process- the term "timely" is ambiguous, can YEC provide an explicit window of time for which a complaint will be addressed?

Response: It is difficult to define a window of time that any individual complaint will be 'addressed' without knowing the specifics of the matter or how it could possibly be addressed. I think it is reasonable for folks to expect that we will initiate a 'response' in a timely manner and attempt to effect resolution as soon as possible.

From: **Emily.Sessford** To: **Travis Ritchie**

Cc: Elizabeth.Barker; Shannon Mallory

RE: [EXT] RE: 60-010-01-Faro-Inspection-Report Subject:

Date: December 16, 2022 2:13:00 PM

> image002.png image003.png image004.png image005.png

image006.png image007.png

Good afternoon Travis,

Attachments:

Appreciate your attention to the corrective actions. There are no outstanding items or concerns on my end with regards to the requests.

Please do continue to work with Liz with Standards & Approvals for the proposed Complaint Management Plan, as well as any other items she may have.

Sincerely,



Emily Sessford

Environmental Compliance Officer Environment | Environmental Compliance & Inspections T 867-667-5398 | C 867-332-2945 | Yukon.ca



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

Sent: December 13, 2022 11:57 AM

To: Emily.Sessford < Emily.Sessford@yukon.ca>

Cc: Elizabeth.Barker <Elizabeth.Barker@yukon.ca>; Shannon Mallory <Shannon.Mallory@yec.yk.ca>;

Sarah.Preiksaitis <Sarah.Preiksaitis@yukon.ca>

Subject: [EXT] RE: 60-010-01-Faro-Inspection-Report

Hello Emily,

Please see the following responses to the Corrective Actions outlined in Inspection Report 2022.068 (attached for easy reference).

Corrective Action/Follow-up Requirements

1. Permittee is requested to confirm condition 4.3 is being met at the Faro station with regard

to adequate equipment installation to 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.

Response: No units under permit have emission control equipment associated with particulate collection.

2. Permittee is requested to meet condition 6.1 (a-f) or 6.2 (a-b) with regards to the Complaint Management System. Follow-up with an environmental protection analysts regarding 6.1 and 6.2 is required.

<u>Response:</u> Please see attached draft/proposed Complaint Management Plan (for Sarah/Elizabeth review and approval).

3. Permittee is requested to provide an example of the records collected as noted in condition 8.2 (b).

Response: Please see 2021 detailed mechanical inspection summary report for FD7 attached, as an example.

4. Permittee is requested to provide all records since issuance of this permit May 11th 2022, pertaining to conditions 8.2(c), (d) and (e).

Response: Please see attached incident summary and communications thread respecting a reported coolant spill to ground surface at the FGS, per permit Part 8.2(c). There are no applicable records respecting permit Part 8.2 (d) or (e) for the requested time period.

If you have any questions, comments, or concerns with these responses please let me know.

Thanks Emily (Sarah and Elizabeth too).

Regards,

Travis





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Please consider the environment before printing this e-mail

From: Travis Ritchie

Sent: December 9, 2022 12:53 PM

To: 'Emily.Sessford' < Emily.Sessford@yukon.ca> **Cc:** Elizabeth.Barker < <u>Elizabeth.Barker@yukon.ca</u>> **Subject:** RE: 60-010-01-Faro-Inspection-Report

Hi Emily,

I apologize for the delay in responding.

I expect to have responses to each of the corrective actions by early next week.

Thanks for your understanding and patience.

Regards,

Travis

From: Emily.Sessford < <u>Emily.Sessford@yukon.ca</u>>

Sent: December 8, 2022 2:53 PM

To: Travis Ritchie < <u>Travis.Ritchie@yec.yk.ca</u>> **Cc:** Elizabeth.Barker <<u>Elizabeth.Barker@yukon.ca</u>> **Subject:** FW: 60-010-01-Faro-Inspection-Report

Good afternoon Travis,

A reminder that the corrective action/ follow-up deadline for Inspection Report 2022-068 at the Faro site was November 25, 2022. Please advise as to when you will be able to follow-up and submit the required actions.

Sincerely,



Emily Sessford

Environmental Compliance Officer
Environment | Environmental Compliance & Inspections
T 867-667-5398 | C 867-332-2945 | Yukon.ca



From: Emily.Sessford

Sent: October 26, 2022 3:44 PM

To: 'Travis Ritchie' < <u>Travis.Ritchie@yec.yk.ca</u>>

Cc: Gary Jones <<u>Gary.Jones@yec.yk.ca</u>>; Philippe.Thibert-Leduc <<u>Philippe.Thibert-Leduc@yukon.ca</u>>;

Sarah.Preiksaitis < <u>Sarah.Preiksaitis@yukon.ca</u>> **Subject:** 60-010-01-Faro-Inspection-Report

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Sincerely,



Emily Sessford

Environmental Compliance Officer Environment | Environmental Compliance & Inspections T 867-667-5398 | C 867-332-2945 | Yukon.ca



From: <u>Elizabeth.Barker</u>
To: <u>Emily.Sessford</u>

Subject: RE: [EXT] RE: 60-010-01-Faro-Inspection-Report

Date: December 16, 2022 1:56:20 PM

Attachments: <u>image001.png</u>

image002.png image003.png image004.png image005.png image006.png

Hey Emily- I've had a look through this file and I'm ok with the follow up responses provided by Travis. I'm going to go through the complaint management plan and I can follow up with Travis directly for any comments on that. I think you're ok to close things on your end with Travis.

Have a great weekend!

Liz

From: Emily.Sessford < Emily.Sessford@yukon.ca>

Sent: December 14, 2022 2:42 PM

To: travis.ritchie <travis.ritchie@yec.yk.ca>

Cc: Elizabeth.Barker <Elizabeth.Barker@yukon.ca>; Shannon Mallory <Shannon.Mallory@yec.yk.ca>;

Sarah.Preiksaitis <Sarah.Preiksaitis@yukon.ca>

Subject: RE: [EXT] RE: 60-010-01-Faro-Inspection-Report

Hi Travis,

Thank you for providing the requested follow-up. We will review and advise.

Sincerely,



Emily Sessford

Environmental Compliance Officer
Environment | Environmental Compliance & Inspections
T 867-667-5398 | C 867-332-2945 | Yukon.ca

From: Travis Ritchie < <u>Travis.Ritchie@vec.yk.ca</u>>

Sent: December 13, 2022 11:57 AM

To: Emily.Sessford@yukon.ca>

Cc: Elizabeth.Barker <<u>Elizabeth.Barker@yukon.ca</u>>; Shannon Mallory <<u>Shannon.Mallory@yec.yk.ca</u>>; Sarah.Preiksaitis <<u>Sarah.Preiksaitis@yukon.ca</u>>

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<u>Response:</u> Please see attached draft/proposed Complaint Management Plan (for Sarah/Elizabeth review and approval).

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If you have any questions, comments, or concerns with these responses please let me know.

Thanks Emily (Sarah and Elizabeth too).

Regards,

Travis



Travis Ritchie

Manager - Environment, Assessment, & Licensing Telephone: 867-393-5350 | Mobile: 867-333-0300



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Sent: December 9, 2022 12:53 PM

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Sent: December 8, 2022 2:53 PM

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Environment | Environmental Compliance & Inspections
T 867-667-5398 | C 867-332-2945 | Yukon.ca

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To: <u>Emily.Sessford</u>

Cc: <u>Elizabeth.Barker; Shannon Mallory; Sarah.Preiksaitis</u>
Subject: [EXT] RE: 60-010-01-Faro-Inspection-Report

Date: December 13, 2022 11:57:07 AM

Attachments: image001.png

image2cc606.PNG imageda265a.PNG image6f946e.PNG imagec3ece2.PNG image4c6cae.PNG

20221014-Inspection-report-es.pdf

Yukon Energy - FD7 Inspection Summary.pdf

PERMIT 60.010.01 Faro Noise Complaint Management Plan Proposal.pdf

FGS 2022 Glycol Release.pdf

Incident Reporting - EMSF-005 Corrective Action Report -i 0 .w yec smallory-2022-07-06T10 44 39.pdf

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Manager - Environment, Assessment, & Licensing Telephone: 867-393-5350 | Mobile: 867-333-0300





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Environmental Compliance Officer
Environment | Environmental Compliance & Inspections
T 867-667-5398 | C 867-332-2945 | Yukon.ca

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Emily Sessford
Environmental Compliance Officer
Environment | Environmental Compliance & Inspections
T 867-667-5398 | C 867-332-2945 | Yukon.ca



Yukon Environmental Protection and Assessment Branch

Environment Act INSPECTION REPORT

Permit No.: 60-010-01

Inspection Report No.: 2022-068

| Assessment Branch | | | | | | | | | | |
|---|-------------------------|-----------|-----|--|-----------------------|-----------|-----------------|-----------------------------------|--------------------------|---------|
| GENERAL INFORMATION | | | | | | | | | | |
| PERMITTEE: | | | | | | | | | | |
| Yukon Energy Corporation | | | | | | | | | | |
| PERSON CONTACTED: ACCOMPANIED BY: Gary JONES INSPECTED BY: | | | | | | | | | | |
| Gary JONES & Trav | vis RITCl | HIE | | | | | Emily SESSFORD | | | |
| MAILING ADDRES | SS: Box ! | 5920, W | hit | tehorse, YT Y1A 69 | 57 | | | | | |
| | | | | | | | | | | |
| LOCATION: 413 C | ampbell | Street, F | ar | o, YT Y0B 1K0 | | | | | | |
| INSPECTION DAT | E & TIM | E: | F | PERMIT EXPIRY D | ATE: | | L | AST INSPECTED |): | |
| October 14, 2022 | 13:00 | | Е | December 31, 203 | 1 | | N/A | | | |
| | | | | PERMIT [*] | TYPE | • | | | | |
| ☐ Air Emissions | | | | | | | | Solid Waste Mana | gement | |
| ☐ Beverage Containe | ers | | | Pesticides | | | □ Special Waste | | | |
| ☐ Designated Materi | | | | | | | | Ozone Depleting S | Substances | & Other |
| ☐ Land Treatment Fa | acility | | | Risk-Based Restor | ation | | | Halocarbons | | |
| | | | | INSPECTED A | | | | | | |
| CONDITIONS: A – A Activities | Acceptable Condition | | OI | ncerns U – Unaco | ceptable Condition | | No | t Applicable N | /I – Not In Condition | Spected |
| Closure/ Decommissioning | N/A | Comment | ١ | Management of | N/A | Comment | | Signage & | N/A | Comment |
| Closure/ Decommissioning | IN/A | | ļ | Contaminated Water | IN/A | | - | Segregation | IN/A | |
| Construction | N/A | | | Opacity | N/A | | | Site Conditions | N/A | |
| Emissions Monitoring | С | *3,*4,*7 | | Pesticide Appendix | N/A | | | Soil Handling & Stockpiling | N/A | |
| Facility Maintenance | Α | | | Pesticide Application | N/A | | | Spills | Α | *8 |
| Facility Operations | Α | *1,*2 | | Pesticide Applicator Certifications | N/A | | | Storage & Disposal | N/A | |
| Facility Specifications | N/A | | | Pesticide Transportation | N/A | | | Storage & Handling | N/A | |
| Fencing & Security | N/A | | | Release of Contaminants | Α | *3 |] | Testing & Emissions Management | Α | *4 |
| Incineration/ Burning | N/A | | | Relocation of Contaminated Material | N/A | | | Transport & Transfer | N/A | |
| Inspections, Record Keeping & Reporting | С | *5,*6,*8 | | Removal of Remediated Soil | N/A | | | Unauthorized Emissions | Α | *7 |
| Cell coverage | N/A | | 1 | Sampling & Analysis | N/A | | | Other | | |
| | | | | ENFORCEMEN | T ACTIO | NC | | | | |
| ☐ Written Warning ☐ Inspector's Direction ☐ Non-Compliance | | | | | | | | | | |
| INSPECTION COMMENTS | | | | | | | | | | |
| On October 14 th 2022, the undersigned officer conducted an inspection of air emissions permit 60-010-01 | | | | | | | | | | |
| site location 413 Campbell Street, Faro, Yukon. At time of inspection no generators were in operation and all | | | | | | | | | | |
| electricity was being generated via hydro. | | | | | | | | | | |
| Scope of Authorization | | | | | | | | | | |
| | | to opera | te | electricity generat | ing equi | pment at | : th | ne site noted on p | permit, to | a site |
| capacity of 15. | 5MW as | set out i | n t | the terms and cond | dition of | this perm | nit. | | | |
| General*1 | | | | | | | | | | |

- Permittee is compliant with condition 2.3 to 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.
 - o On inspection, (a) a copy of this permit is posted in the main office; (b) personnel are informed of permit when knew to position; (c) confirmation by JONES that Yukon Energy has environmental policies regarding aspects of permit including spill reporting.

| INSPECTOR | RECEIVED BY |
|------------------------------|---------------|
| Signature: | Signature: |
| Printed Name: Emily Sessford | Printed Name: |



Environment Act INSPECTION REPORT

Permit No.: 60-010-01

Inspection Report No.: 2022-068

Environmental Protection and Assessment Branch

Operation and Maintenance*2

- Permittee is compliant with condition 3.1 to operate any combination of the two permanent diesel generators and six rental diesel generators to a site capacity of 15.5MW of power.
 - There was six rental generators marked as: YM20, YM21, YM22, YM23, YM24 and YM26. All rental generators are 1.8MW max energy output. JONES noted typically no more than 3-4 maximum would ever be running at one time, in the higher consumption months November-February.
 - There are two permanent generators in two separate buildings marked as: FD1 and FD7.
 - Permittee is reminded that a permit amendment must be obtained prior to adding generators beyond the currently installed capacity.
- Permittee has indicated that compliance with condition 3.2 is met. To in accordance with the
 manufacturer's recommendations and best management practices, the permittee shall inspect, maintain
 and operate the sources, and 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.
 - The 2021 Annual Report from Yukon Energy states in comment 3 that "all applicable maintenance conducted on the fleet in 2021 was in accordance with the unit manufacturer's instructions and recommendations.
 - > JONES noted on inspection if they observe issue, it is reported to supervisor / Whitehorse.
- As required in condition 3.3, permittee confirmed the sources are run in order of the highest possible efficiency under the circumstances.
 - o The rental generators are typically ran first as they are most efficient. If possible, the FD1 permanent generator is not used as it is less efficient. It is anticipated to be replaced in the upcoming years.
- Permittee appears to be in compliance with condition 3.4 to 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.
 - o Ultra low Sulphur fuel is used. Winter fuel is burnt all year round and is supplied by North of 60.

Release of Contaminants*3

Permittee at time of inspection was compliant with 4.1 and 4.2 with regards to emissions and opacity.

- On inspection no visible emissions where observed.
- Condition 4.3 states that 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.
 - JONES was not sure about this condition. However, it was noted by RITCHIE while on inspection
 of Whitehorse station that: the only control equipment used is that which is installed by the
 manufacturer.

Monitoring Emissions*4

- Permittee has reached compliance with conditions 5.1 to submit a monitoring plan for NO₂ to the environmental protection analyst.
 - It has been confirmed with environmental protection analyst that documentation was sent in October 2022.
 - Any follow-up required based on what was submitted with regards to part 5 of permit will initially be through the environmental protection analyst.

| INSPECTOR | RECEIVED BY |
|------------------------------|---------------|
| Signature: Guilffios | Signature: |
| Printed Name: Emily Sessford | Printed Name: |



Environment Act INSPECTION REPORT

Permit No.: 60-010-01

Inspection Report No.: 2022-068

Environmental Protection and Assessment Branch

Complaint Management System*5

- Permittee has failed to meet condition 6.1 (a-f) or 6.2 (a-b) with regards to the Complaint Management System. As noted in 2.9 of permit "all conditions of this permit must be met within 90 days of the permit effective date".
 - Follow-up with an environmental protection analysts regarding 6.1 and 6.2 is required.

Reporting*6

Permittee is compliant with condition 7 (a-d) with regards to reporting.

Unauthorized Emissions*7

- Permittee appears to be compliant with condition 7.1 with regards to unauthorized emissions, and reporting.
 - o JONES said there have been no unauthorized releases and that they have internal protocols for any spills that occur.

Records*8

 Records as required in condition 8.2 were not available at time of inspection, however JONES noted that all records are sent to the Whitehorse main station.

Corrective Action/Follow-up

- 1. Permittee is requested to confirm condition 4.3 is being met at the Faro station with regards adequate equipment installation to 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.
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- 4. Permittee is requested to provide all records since issuance of this permit May 11th 2022, pertaining to conditions 8.2(c), (d) and (e).

Please provide all required corrective action/follow-up to the undersigned officer no later than November 25th 2022.

Where applicable please follow up with Sarah Preiksaitis, environmental protection analyst at sarah.preiksaitis@yukon.ca.

| INSPECTOR | RECEIVED BY |
|------------------------------|---------------|
| Signature: Jackships | Signature: |
| Printed Name: Emily Sessford | Printed Name: |



Yukon Energy – Faro - FD7 – Cat 3612 SN: 9RC00071



Faro Yukon - Cat 3612 Generator Inspection Summary

Sunday Aug 21 – Travel from Red Deer Alberta to Faro Yukon

Monday Aug 22 - Conditional Monitoring - Test Run

Monday AM

Arrived onsite meet with customer rep Gary Complete site orientation Meet customer reps Riley and Katherine – unload tools and equipment Prepared the engine conditional monitoring

Monday PM

Competed 4 hr. condition monitoring under load – see additional reports Items noted during testing:

- Exhaust
 - o Exhaust turbo temp sensors are backwards (left and right) corrected
- Coolant systems
 - o Adjusted coolant set points to improve function
 - #1 fan starts at 155°F, #2 fan starts at 160°F, #3 fan starts at 165°F, and #4 starts at 170°F
- Outside Front Vibration Dampener
 - o Is not working
- #3 right cylinder runs hotter than the others at start up

Review and complete lock out procedures

Drain coolant prepare engine for dismantling

Disconnected and removed one starter install and connected Collicutt engine baring device

Reviewed conditional monitoring data

- Monitors picked up #4 right cylinder has a slight tap at 270°
 - o We selected as target cylinder to dismantle and inspect



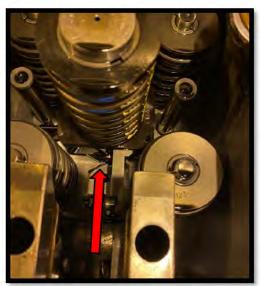
Yukon Energy – Faro - FD7 – Cat 3612 SN: 9RC00071

Tuesday Aug 23 - Dismantle and Inspect Cylinder 4 Right

Tuesday AM

Drain fuel system Remove valve covers Inspected all cylinder heads

- Injectors #1 & #3 left
 - o O-rings sheared off from previous install
- Injector #2 right
 - o O-ring sheared off and visible
 - Injector spring is broken
 - Replaced with Cat reman injector









Tuesday AM

Front outer vibration dampener

- · Removed Aux In water piping to access vibration dampener guard
 - o Noted 7 of 9 broken tabs on guard back and front
 - We repaired by welding tabs back onto the guard

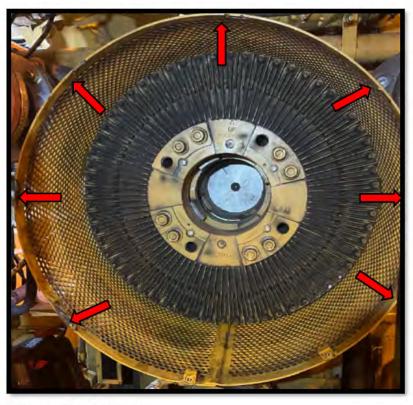


Figure 2- Front Dampener Guard - 7 Broken Tabs





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Tuesday AM

- · Removed oil plug and inspected oil
 - o Oil is dirty and set up
 - This oil should be clear when in good condition

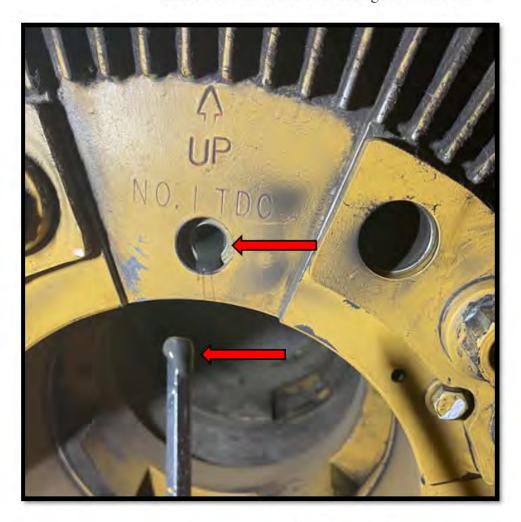


Figure 3 - Front Dampener Oil

#4 Right cylinder

- Disconnect and remove coolant piping
- · Dismantle and remove exhaust manifold
- Install hydraulic tooling
- · Stretch head studs and back off head nuts, remove tooling
- · Remove cylinder head
 - o Noted some wear in the injector bore
- Inspect deck
 - Good condition



Tuesday AM

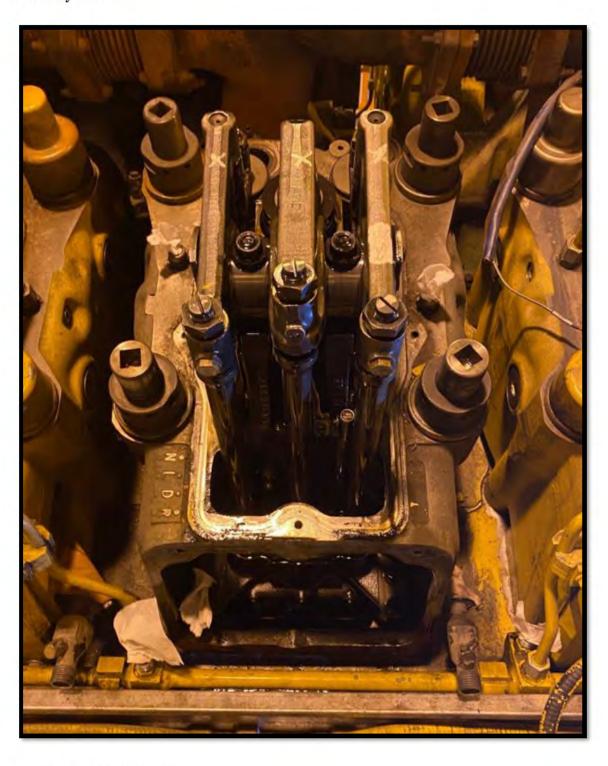


Figure 4 - #4 Right Cylinder Head



Tuesday AM

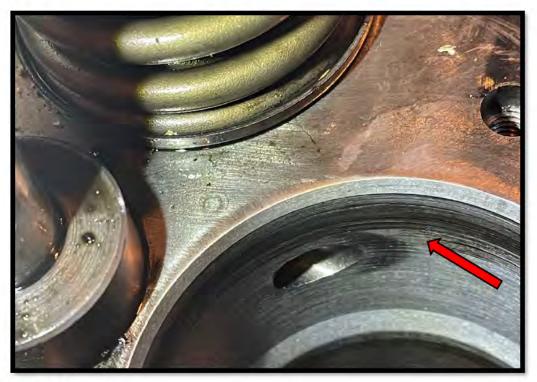


Figure 5- #4 Right Injector Bore

Tuesday PM

#4 Right Cylinder

- Unbolt and removed connecting rod cap
- · Removed Piston and Connecting rod
- Wrap crank to protect from contamination
- Inspected liner
 - o A little rough appearance
 - Possible it was caused by minor rusting
 - o O-rings are in pore condition
- Inspected rod bearings good condition
- Inspected crank / rod journal good condition
- Inspect Piston
 - Some carbon build up
 - o #3 ring was seized in groove
 - o Top ring chrome was flaking off
 - Removed piston rings
 - Cleaned and inspected piston ring groves
- · Drain engine oil from crank case
- Install main bearing stud hydraulic tooling





Figure 6- #4 Right Piston - Seized Third Ring





Figure 7 - #4 Right Piston - Ring with carbon



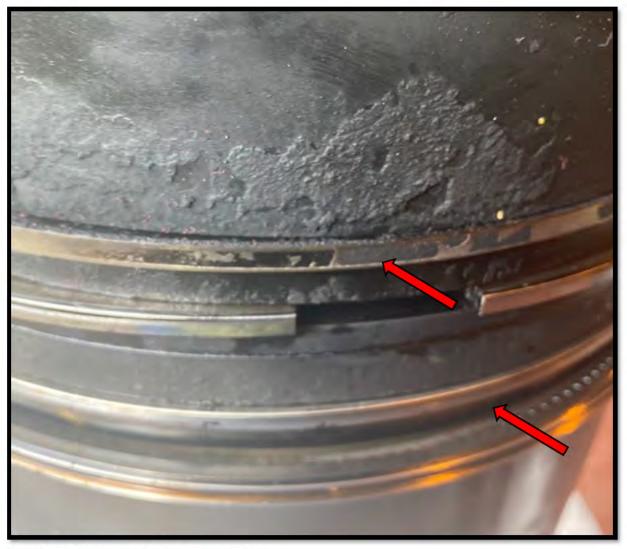


Figure 8- #4 Right Piston - Top Ring Chrome Flaking



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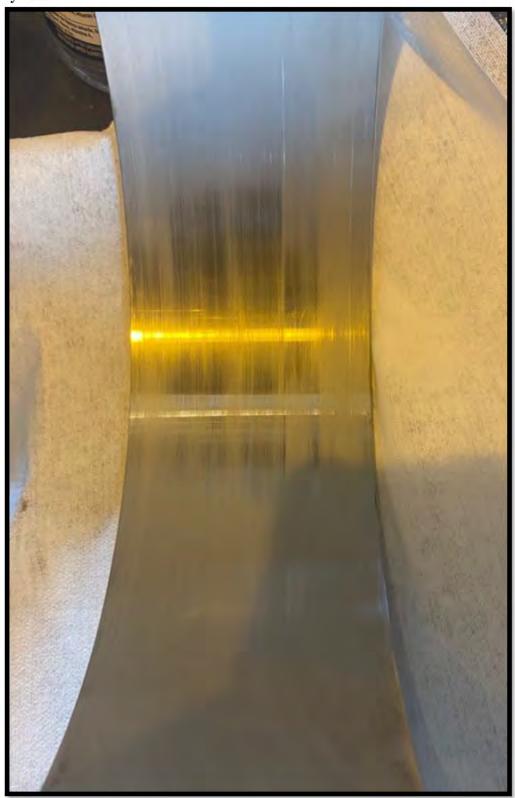


Figure 9- #4 Right - Rod Upper Cap Bearing



Wednesday Aug 24 - Dismantle and Inspect

Wednesday AM

Clean and inspect cylinder head

Borescope cylinders - liners and valve in good condition, carbon build up was minimal. Set and up tooling and removed #4 right cylinder liner Inspected liner

- O-rings are in poor condition
 Inspected block and liner fits #4 right
 - cavitation noted on the lower liner fit still in usable condition as O-ring sealing surface is still good



Figure 10- #4 Right Liner



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Figure 11 - #4 Right Deck Surface





Figure 12- #4 Right Liner O-rings





Figure 13- #4 Right - Lower Liner Fit



Figure 14- #4 Right - Lower Liner Fit



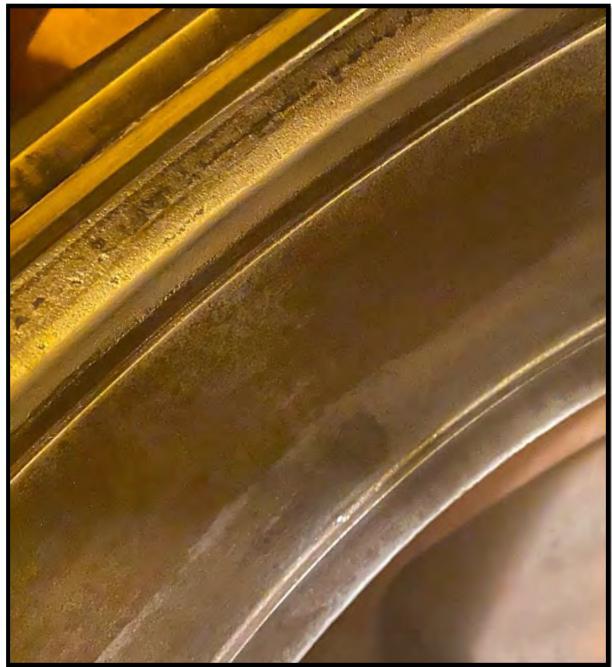


Figure 15- #4 Right Upper Liner Fit



Wednesday PM

#4 Main Bearing

- Removed main cap cross ties
- Set up hydraulic tooling and loosen off main cap nuts
- · Lowered main cap and inspect
 - Bearing in good condition
 - Crankshaft in good condition
 - o Cap surfaces good condition with no fretting on mating surfaces
- · Clean and apply Lubriplate to main bearing
- · Install main bearing and cap
- Stretch studs and tighten main can nuts
 - o 9000 PSI
- Install and torque cross tie bolts to 1400 ft lbs
- Measure crankshaft end play
 - Moved feely
 - o 0.012"



Figure 16- #4 Main Cap and Bearing





Figure 17- #4 Main Bearing



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Figure 18- Crankshaft #4 Main Journal



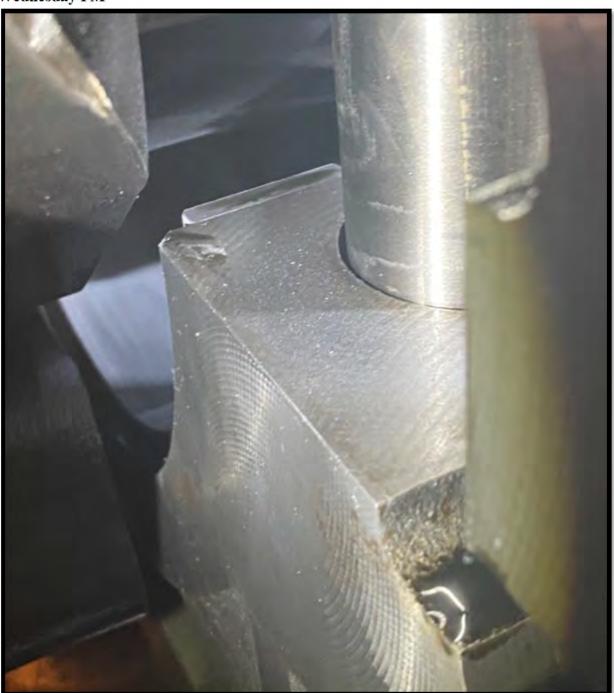


Figure 19- #4 Main Cap - Mating Surface





Figure 20- Crankshaft endplay - 0.012"



Wednesday PM

Clean and buff liner fits

Good condition

Clean and inspect liner and O-ring grooves

- · good condition
- Inspect and install new liner O-rings
- · Lubricate O-rings and liner fits & install liner

Clean & Inspect piston and ring grooves

good condition

Remove and inspect wrist pin and connecting rod bushing

- Minor scratching noted on bushing and wrist pin
- Measure pin to conrod fit 0.0055"

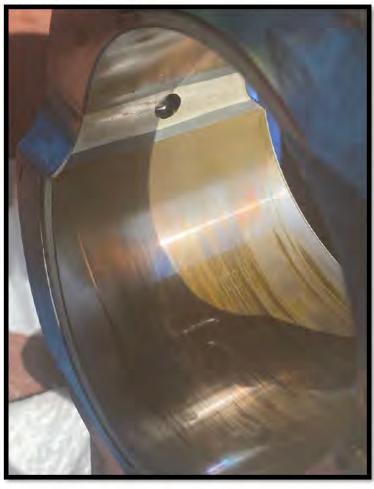


Figure 21 - #4 Right Connecting Rod Bushing



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Wednesday PM

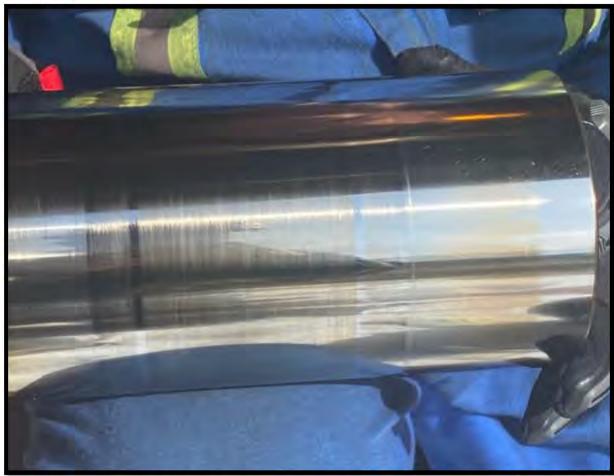


Figure 22 - #4 Right Wrist Pin

Inspect and install new piston rings Remove crankshaft wrapping and inspect Install piston and conrod assembly Libriplate conrod main bearing Install and torque bearing cap

• 220 ft lb plus 180°

Clean and inspect cylinder head

good condition

Clean and inspect block deck

good condition

Inspect and install cylinder head O-ring and gaskets Clean and inspect head studs

good condition

Install cylinder head and set up hydraulic tooling

• Stretch studs at 5000 psi and tighten head bolts



Thursday Aug 25 - Dismantle and Inspect

Thursday AM

Cylinder #4 right head

- Inspect and install new injector O-rings
- Install injector into cylinder head
 - o Torque bolts to 35 ft lb
- Install rocker and bridge assemblies
 - o Torque bolts to 175 ft lb
- Install intake and exhaust piping
 - With new exhaust piping gaskets

Cylinder #5 left

- Disconnected and removed coolant and exhaust piping
- Removed rocker and bridge assembly
- Removed injector and inspect
 - Good condition
- Set up hydraulic tooling and stretch head studs, back off head bolts
- Removed cylinder head and inspected
 - o good condition
- Remove connecting rod bolts and cap
 - o Inspect cap and bearings
 - Good condition
- Removed piston and conrod assembly
- Wrapped crankshaft to protect from contamination



Yukon Energy — Faro - FD7 — Cat 3612 SN: 9RC00071 Thursday AM



Figure 23- #5 Left Connecting Rod Upper Bearing



Thursday PM

Inspected #5 left piston

- Top piston ring seized in ring groove
- Minor chrome flaking from top piston ring



Figure 24 - Piston #5 Left - Top ring seized and flaking



Thursday PM

Removed wrist pin and inspected

- Rod bushing showed fractures
- Wrist pin showed minor scratching
- Measured clearance at 0.006"



Figure 25 - #5 Left Rod Bushing



Thursday PM

Cleaned piston and inspect ring grooves

• Inspected new piston rings and instal

Removed liner and inspected

- Liner O-rings showed some scuffing but not as bad as #4 Right
- Cleaned liner
- Inspected and installed new O-rings



Figure 26 - #5 Left Liner



Thursday PM

Inspected block liner fits

- · Good condition minimal to no signs of pitting
- · Cleaned and buffed liner fits
- · Installed liner into block



Figure 27 - #5 Left Upper Liner Fit



Figure 28 - #5 Left Lower Liner Fit



Thursday PMLubriplates rod bearings

Installed piston and rod assembly

• Torqued rod cap - 220 ft lbs plus 180

#5 Left Cylinder Head

- Inspect and install new head O-rings and gaskets
- Inspect and clean head studs
- Installed cylinder head
- Set up hydraulic tooling and stretch studs at 5000 psi
- Tighten down head bolt nuts

Filled engine with coolant Activated block heat circulation

Friday Aug 26 - Service and Function Testing

Friday AM

Inspected liners and crank case for any signs of coolant leaks - none

Cylinder #5 left head

- Inspect and install new injector O-rings
- Install injector into cylinder head
 - o Torque bolts to 35 ft lb
- Install rocker and bridge assemblies
 - o Torque bolts to 175 ft lb
- Install intake and exhaust piping
 - o With new exhaust piping gaskets

Replaced oil filters and filled engine with oil

Complete valve lash settings on all cylinders

- Exhaust 0.039
- Intake 0.024

Complete injector settings on all cylinders

• 118.0 mm

Check and adjust injector rack Spinner filters where cleaned and installed - very dirty and contaminated Inspect air filters good condition

• Install all crank case doors



Friday PM

Install and torque valve covers
Inspect and function test rig saver valve

Successful test

Alternator

- Visual Inspect windings
 - o Could use a cleaning
- Visual Inspect coupling
 - o good condition

Verified all fluid levels

Pre-lube engine and prep for start up

Start engine and monitor at idle

- · Load engine and monitor 2 hrs full load
 - o 25%, 50%, 75%, and 100% load steps
- Idle engine and cool down

Items noted during running:

- Oil pump piping leaking
- #5 Cylinder continues to run hotter





Friday PM

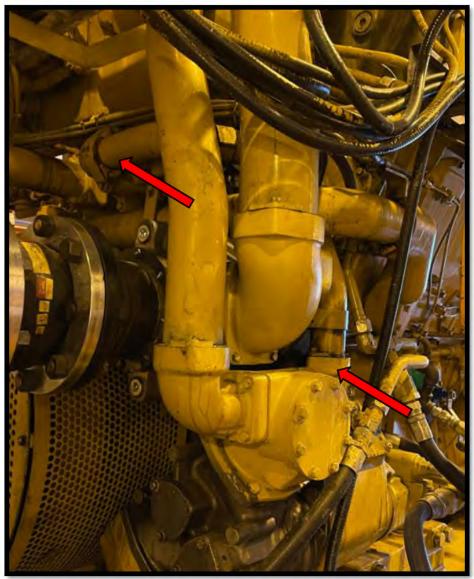


Figure 29 - Oil pump leaking pipes

Saturday Aug 28

- Clean site and pack up tooling
- · Inspect unit and verify no leaks
- Verify fluid levels
- Complete job reports
- · Depart to Whitehorse

Sunday Aug 29



Meet with customer rep in Whitehorse and review high level findings Travel from Whitehorse Yukon to Red Deer Alberta

Monday Aug 30

Gather onsite notes and complete reports

Conclusion and Recommendations

Conclusion:

After inspecting and testing the engine we conclude that it is in good shape. The major components appear to be in favorable condition to continue running and rebuilding when required.

There are a few items to address in the near future and some items to monitor moving forward. Once the high-level items are addressed, we recommend continued use of the engine until future conditional testing shows signs of issue or 40,000 hr. marker is reached. Based on the condition of the engine block and crank the hour meter showing 28,000 hrs. seems to be within a reasonable range of accuracy.

Immediate Recommendations:

- Replace front outer vibration dampener, recommend replacing both at this time
- Replace #3 right injector
- Install vibration altimeter devices 2 on engine and 2 on alternator

Medium Level Recommendations:

- Repeat conditional monitoring testing every 2,000 to 3,000 operating hr. or two years
 - O Use the current report as a base line
- 1,000 hr. or annual oil sample analysis

Low Level Recommendations:

- Budget and plan for an in frame onsite overhaul in approx. 12,000 operating hours
 - o Heads
 - o Turbos
 - o Pistons
 - o Liners
 - o Connecting rod bushings
 - o Cam bushings
 - o Rod and main bearings





December 12, 2022 File: 2515.03.01

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

(via email to: sarah.preiksaitis@gov.yk.ca)

Dear Ms. Preiksaitis,

RE: AIR EMISSIONS PERMIT NO. 60-010-01 - PART 6 - COMPLAINT MANAGEMENT PLAN

Pursuant to the above referenced permit and its monitoring/reporting requirements I am pleased to provide the following *Complaint Management Plan* for your review and approval.

The air emissions permit states in Part 6, Item 1:

The permittee shall submit to an environmental protection analyst a complaint management plan for approval which identifies:

- a) location of signage with contact details for concerns/complaints;
- b) process for community engagement;
- c) noise monitoring, mitigation, and control measures;
- d) dispute resolution process;
- e) management plan will be subject to changes following branch review; and
- f) reporting as described in 6.2

The following information constitutes the *Complaint Management Plan* required under this part of the air emissions permit:

Signage and Contact Information

Yukon Energy maintains signage with contact information for visitors and the public on the front gate of the Faro Generating Station. An additional sign providing contact information for anyone specifically wanting to share concerns and complaints with Yukon Energy will be attached to the facility front gate by January 31, 2023. Telephone, email, and website contact information will be included on the signage. YEC also advise the Town of Faro of this updated signage and related contact information at the time of its installation.

Process for Community Engagement

Yukon Energy routinely communicates with the Town of Faro Chief Administrative Officer. Periodic public communications and events are held in the community to share information about ongoing YEC operations and upcoming activities/projects. Yukon Energy will also add a comment form to the <u>Rental Diesel page</u> on its website by January 31, 2023, and post updates to its Facebook page. Yukon Energy will respond to any requests that may be made by individuals or organizations to engage on the matter of noise or other aspects of its operations in Faro.







Noise Monitoring, Mitigation, and Control Measures

Yukon Energy does not currently have a continuous noise monitoring system in place in Faro but has completed previous acoustic audits in Faro and plans to include additional ambient sound data collection in the future. Noise impact assessment and mitigation, as required, has been part of ongoing planning for infrastructure maintenance and expansion/renewal at the generating station since 2020. This planning consideration will continue, with an objective of incorporating technically and economically feasible, and otherwise reasonable measures to manage the effects of sound emissions from the site during generating periods.

Dispute Resolution Process

Yukon Energy will engage in a timely and responsive manner with any complainant once it receives a complaint. The Corporation will endeavour to respond to complaints in a fair manner consistent with any regulatory requirements and commitments it has made or may make regarding noise. If complainants are not satisfied with YEC's response we will recommend the complainant pursue their concern/complaint with the appropriate regulatory authority (i.e., YG Environment).

Plan Review and Approval

Yukon Energy understands that this Complain Management Plan may be subject to changes following YG Environment review.

Reporting

When Yukon Energy receives a sound complaint related to the operation of the Faro Generating Station the reporting process outlined below will be followed:

- 1. Yukon Energy will notify an environmental protection officer by calling (867) 667-5683 or emailing envprot@yukon.ca within one week upon receipt of any complaints regarding sound.
- 2. Yukon Energy will provide the following information with each notification
 - First and last name of complainant (if provided);
 - b. contact phone number and/or email;
 - c. nature of complaint;
 - d. time and date of complaint;
 - e. ambient meteorological conditions during the period of the complaint;
 - f. list of generators and the duration that the generators were active in the 48hrs prior to the period of time/date outlined in the complaint; and
 - g. record of any adjustments made to the station or its operation to address the complaint.

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 proposed management plan.

Thank you for your time and consideration in this matter.

Yours Sincerely.

Travis Ritchie

Manager – Environment, Assessment, & Licensing

in the

From: Shannon Mallory
To: Travis Ritchie

 Subject:
 Fw: [EXT] Re: spill-22-056-Faro

 Date:
 December 13, 2022 8:45:28 AM

Attachments: <u>image001.png</u>

image004.png image005.png image006.png image007.png image008.png image009.png

From: Cedric.Schilder < Cedric.Schilder@yukon.ca> **Sent:** Thursday, November 10, 2022 8:10 AM

To: Shannon Mallory; Emily.Sessford **Subject:** RE: [EXT] Re: spill-22-056-Faro

Hi Shannon,

Just following up on Emily's email. This site will be added to our online map with an "unknown" status. The unknown status indicates that we have information that contamination is likely present but do not have analytical results confirming this to be the case. When you do complete the remediation the status will be changed to remediated. Please let me know if you have any questions.

Thanks,

Cedric Schilder T (867) 667-8816

From: Shannon Mallory < Shannon. Mallory@yec.yk.ca>

Sent: November 9, 2022 8:36 AM

To: Emily.Sessford <Emily.Sessford@yukon.ca> **Cc:** Cedric.Schilder <Cedric.Schilder@yukon.ca>

Subject: Re: [EXT] Re: spill-22-056-Faro

OK thank you Emily. I will ask that caution tape is put around the area and I will talk to you in the spring.

Shannon



Shannon Mallory

Environment & Resource Analyst

Telephone: 867-393-5316 | Mobile: 867-335-5904



This message may contain confidential or privileged material. Any use of this information by anyone other than the intended recipient is prohibited. If you have received this message in error, please immediately reply to the sender and delete this information from your computer.



Please consider the environment before printing this e-mail

From: Emily.Sessford@yukon.ca>

Sent: Tuesday, November 8, 2022 2:31 PM

To: Shannon Mallory Cc: Cedric.Schilder

Subject: RE: [EXT] Re: spill-22-056-Faro

Hi Shannon,

Thank you for the update. Given the location waiting until spring for further investigation or in-situ treatment is acceptable. I would recommend putting and maintaining caution tape around the contaminated area if possible.

I will check back on this file in the spring to see what remedial path Yukon Energy plans to take. Please note that at this time, we do intend to place this spill on the Contaminated Sites Registry, until confirmation of remediation has occurred. I have cc'd Cedric into the email, please reach out him if you have any questions or concerns regarding this.

Sincerely,



Emily Sessford

Environmental Compliance Officer Environment | Environmental Compliance & Inspections T 867-667-5398 | C 867-332-2945 | Yukon.ca

From: Shannon Mallory < Shannon. Mallory@yec.yk.ca>

Sent: November 8, 2022 2:15 PM

To: Emily.Sessford < Emily.Sessford@yukon.ca>

Subject: [EXT] Re: spill-22-056-Faro

Hi Emily,

Yes, that is correct with the relocation permit being cancelled. The spill was cleaned up in terms of what was on the surface with sorbent pads. However, excavation was not able to go ahead as the location of it is underneath a radiator fan. No equipment can go under there and even hand tools would be difficult to wield with the low level of the fan overhead. It's not a very safe place to work.

I will have to revisit this in the spring when the ground thaws again potentially investigating in-situ treatment, digging with hand spades or leaving in place.

Here is a photo of the location under the radiator fan



Shannon

From: Emily.Sessford < Emily.Sessford@yukon.ca Sent: Tuesday, November 8, 2022 10:12 AM

To: Shannon Mallory

Subject: spill-22-056-Faro

Hi Shannon,

I am following up regarding spill 22-056 at Faro station. I spoke with Cedric and he noted that the relocation permit was cancelled and that no remedial activities occurred due to access concerns.

Could you please provide me a full update as to what has occurred and plan on what Yukon Energy intends to do at site. Based on our conversation in July, Darryl Johnson was going to site and excavation was to occur.

Regards,



Emily Sessford

Environmental Compliance Officer Environment | Environmental Compliance & Inspections T 867-667-5398 | C 867-332-2945 | Yukon.ca



Incident and Corrective Action Report

Instructions:

| Please fill out all fields below. | Once complete, su | ubmit the form to the SharePoint site and a notification will |
|-----------------------------------|-------------------|---|
| be sent automatically to the Y | EC EMS Manager. | You should also print the form for your records. |

| be sent automatically to the YEC EMS Manager. You should also print the form for your records. | | | | | | |
|--|--|---|--|--|--|--|
| Contact Information: | | | | | | |
| First Name: Darrell | | | | | | |
| Last Name: Johnson Telephone: 867-335-2863 | | | | | | |
| What are you reporting? (Make selection | and form will appear belo | ow) | | | | |
| Spill / Release event Audit / Inspection requirement Improvement / Recommendation EMS Non-Conformance Systems / Administrative Failure | | | | | | |
| | | | | | | |
| Document Attachments: No file attached | | | | | | |
| Spill / Release Event: General Informat | tion | | | | | |
| Date of Spill / Release: 2022-07-06 | Time (24hr h | nh:mm): 09:40 | | | | |
| Location / Facility: Faro Diesel Plant | Area/Region: Faro | | | | | |
| Coordinates of spill (if available): | | | | | | |
| Describe the events that resulted in this spill | or release: | What was the cause of the spill? | | | | |
| A valve broke on FD1 releasing coolant Approximately 200L. It was not noticed July 6th. Leak has been stopped and so placed | to soil. I until the morning of orbent have been | (do not speculate) Equipment failure | | | | |
| Who wa | as doing the work? N/A | | | | | |
| Who was the work be | | | | | | |
| THE WAS DE WORK DE | | any external parties or regulators contacted? | | | | |
| | If yes, whom? Yuko | | | | | |
| Others with first | | operator | | | | |

Type of Spill or Release:

| Material Released: | | | 0074 |
|-----------------------------------|----------------|------------------------------------|------|
| coolant | | | |
| (E.g. Motor oil) | | | |
| (E.g. Motor on) | | | |
| Amount Released from Equipmen | t: | | |
| 200L | | | |
| Amount Released to Environment | | | |
| 200L | | | |
| (e.g. Approx. volume) | | | |
| If yes, oil type: | | | |
| PCB Concentration (ppm): | | | |
| How PCB concentration | was determined | d: | |
| | | | |
| | | Is an investigation required? | |
| | | ○ Yes ○ No | |
| Action and Follow-Up: | | | |
| - | | Additional comments / details: | |
| Describe any immediate action tak | en: | | |
| Leak stopped and sorbent place | | Thursday july 7th, D. Johnson will | |

up plan. Excavating the spill and placing contaminated materials on a tarp and covered with a tarp until a relocation permit has been received. Photos will be taken. July 14th, Travis will take soil samples of the excavation walls for confirmatory

sampling

From: Emily.Sessford
To: "Travis Ritchie"

Cc: <u>Gary Jones; Philippe.Thibert-Leduc; Sarah.Preiksaitis</u>

 Subject:
 60-010-01-Faro-Inspection-Report

 Date:
 October 26, 2022 3:44:00 PM

Attachments: <u>image001.png</u>

20221014-Inspection-report-es.pdf

Good afternoon Travis,

Please find attached Inspection Report 2022-068 for the Faro station. Please note the corrective action/ follow-up required and the associated deadline. If you have any questions or concerns please do not hesitate to contact me.

Sincerely,



Emily Sessford

Environmental Compliance Officer Environment | Environmental Compliance & Inspections T 867-667-5398 | C 867-332-2945 | Yukon.ca



Yukon Environmental Protection and

Environment Act INSPECTION REPORT

Permit No.: 60-010-01

Inspection Report No.: 2022-068

| Assessment Branch | | | | | | | | | | |
|---|---|----------|---------------------|--|-----------|---------|--------------------------------------|-----------------------------------|-------------|---------|
| | | | | GENERAL INFO | DRMATI | ON | | | | |
| PERMITTEE: | | | | | | | | | | |
| Yukon Energy Corporation | | | | | | | | | | |
| PERSON CONTACTED: | | | ^ | ACCOMPANIED B | Y: Gary. | JONES | INSPECTED BY: | | | |
| Gary JONES & Trav | vis RITCŀ | HIE | | | | | E | mily SESSFORD |) | |
| MAILING ADDRES | MAILING ADDRESS: Box 5920, Whitehorse, YT Y1A 6S7 | | | | | | | | | |
| LOCATION: 413 Campbell Street, Faro, YT Y0B 1K0 | | | | | | | | | | |
| INSPECTION DAT | E & TIMI | E: | PERMIT EXPIRY DATE: | | | | LAST INSPECTED: | | | |
| October 14, 2022 | 13:00 | | | December 31, 203 | 1 | | N/A | | | |
| | | | | PERMIT | TVDE | | | | | |
| ☐ Air Emissions | | | | Ministerial Authoria | | | | Solid Waste Mana | gement | |
| ☐ Beverage Containe | ers | | | | Eddoll | | □ Special Waste | | | |
| Designated Materi | als | | | Relocation | | | ☐ Ozone Depleting Substances & Other | | | |
| ☐ Land Treatment Fa | acility | | | Risk-Based Restor | ation | | | Halocarbons | | |
| | | | | INSPECTED A | CTIVITIES | | | | | |
| CONDITIONS: A - A | cceptabl | e C-C |) OI | ncerns U – Unac | ceptable | N/A - | No | t Applicable N | /I – Not In | spected |
| Activities | Condition | Comment | | Activities Management of | Condition | Comment | | Activities Signage & | Condition | Comment |
| Closure/ Decommissioning | N/A | | | Contaminated Water | N/A | | | Segregation | N/A | |
| Construction | N/A | | | Opacity | N/A | | | Site Conditions | N/A | |
| Emissions Monitoring | С | *3,*4,*7 | | Pesticide Appendix | N/A | | | Soil Handling & Stockpiling | N/A | |
| Facility Maintenance | Α | | | Pesticide Application | N/A | | | Spills | Α | *8 |
| Facility Operations | Α | *1,*2 | | Pesticide Applicator Certifications | N/A | | | Storage & Disposal | N/A | |
| Facility Specifications | N/A | | | Pesticide Transportation | N/A | | | Storage & Handling | N/A | |
| Fencing & Security | N/A | | | Release of Contaminants | Α | *3 | | Testing & Emissions Management | Α | *4 |
| Incineration/ Burning | N/A | | | Relocation of Contaminated Material | N/A | | | Transport & Transfer | N/A | |
| Inspections, Record Keeping & Reporting | С | *5,*6,*8 | | Removal of Remediated Soil | N/A | | 1 | Unauthorized Emissions | Α | *7 |
| Cell coverage | N/A | | | Sampling & Analysis | N/A | | | Other | | |
| | | | | ENFORCEMEN | IT ACTIO | N | | | | |
| ☐ Written Warning ☐ Inspector's Direction ☐ Non-Compliance | | | | | | | | | | |
| INSPECTION COMMENTS | | | | | | | | | | |
| On October 14 th 2022, the undersigned officer conducted an inspection of air emissions permit 60-010-01 | | | | | | | | | | |
| site location 413 Campbell Street, Faro, Yukon. At time of inspection no generators were in operation and all | | | | | | | | | | |
| electricity was being generated via hydro. | | | | | | | | | | |
| Scope of Authorization | | | | | | | | | | |
| Permittee is authorized to operate electricity generating equipment at the site noted on permit, to a site | | | | | | | | | | |
| | | | | the terms and cond | | • | | • | | |
| General*1 | | | | | | | | | | |
| October 1 | | | | | | | | | | |

- Permittee is compliant with condition 2.3 to 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.
 - o On inspection, (a) a copy of this permit is posted in the main office; (b) personnel are informed of permit when knew to position; (c) confirmation by JONES that Yukon Energy has environmental policies regarding aspects of permit including spill reporting.

| INSPECTOR | RECEIVED BY |
|------------------------------|---------------|
| Signature: | Signature: |
| Printed Name: Emily Sessford | Printed Name: |



Environment Act INSPECTION REPORT

Permit No.: 60-010-01

Inspection Report No.: 2022-068

Environmental Protection and Assessment Branch

Operation and Maintenance*2

- Permittee is compliant with condition 3.1 to operate any combination of the two permanent diesel generators and six rental diesel generators to a site capacity of 15.5MW of power.
 - There was six rental generators marked as: YM20, YM21, YM22, YM23, YM24 and YM26. All rental generators are 1.8MW max energy output. JONES noted typically no more than 3-4 maximum would ever be running at one time, in the higher consumption months November-February.
 - There are two permanent generators in two separate buildings marked as: FD1 and FD7.
 - Permittee is reminded that a permit amendment must be obtained prior to adding generators beyond the currently installed capacity.
- Permittee has indicated that compliance with condition 3.2 is met. To in accordance with the
 manufacturer's recommendations and best management practices, the permittee shall inspect, maintain
 and operate the sources, and 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.
 - The 2021 Annual Report from Yukon Energy states in comment 3 that "all applicable maintenance conducted on the fleet in 2021 was in accordance with the unit manufacturer's instructions and recommendations.
 - > JONES noted on inspection if they observe issue, it is reported to supervisor / Whitehorse.
- As required in condition 3.3, permittee confirmed the sources are run in order of the highest possible efficiency under the circumstances.
 - o The rental generators are typically ran first as they are most efficient. If possible, the FD1 permanent generator is not used as it is less efficient. It is anticipated to be replaced in the upcoming years.
- Permittee appears to be in compliance with condition 3.4 to 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.
 - o Ultra low Sulphur fuel is used. Winter fuel is burnt all year round and is supplied by North of 60.

Release of Contaminants*3

Permittee at time of inspection was compliant with 4.1 and 4.2 with regards to emissions and opacity.

- o On inspection no visible emissions where observed.
- Condition 4.3 states that 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.
 - JONES was not sure about this condition. However, it was noted by RITCHIE while on inspection
 of Whitehorse station that: the only control equipment used is that which is installed by the
 manufacturer.

Monitoring Emissions*4

- Permittee has reached compliance with conditions 5.1 to submit a monitoring plan for NO₂ to the environmental protection analyst.
 - It has been confirmed with environmental protection analyst that documentation was sent in October 2022.
 - Any follow-up required based on what was submitted with regards to part 5 of permit will initially be through the environmental protection analyst.

| INSPECTOR | RECEIVED BY |
|------------------------------|---------------|
| Signature: Girly Joseph | Signature: |
| Printed Name: Emily Sessford | Printed Name: |



Environment Act INSPECTION REPORT

Permit No.: 60-010-01

Inspection Report No.: 2022-068

Environmental Protection and Assessment Branch

Complaint Management System*5

- Permittee has failed to meet condition 6.1 (a-f) or 6.2 (a-b) with regards to the Complaint Management System. As noted in 2.9 of permit "all conditions of this permit must be met within 90 days of the permit effective date".
 - Follow-up with an environmental protection analysts regarding 6.1 and 6.2 is required.

Reporting*6

Permittee is compliant with condition 7 (a-d) with regards to reporting.

Unauthorized Emissions*7

- Permittee appears to be compliant with condition 7.1 with regards to unauthorized emissions, and reporting.
 - o JONES said there have been no unauthorized releases and that they have internal protocols for any spills that occur.

Records*8

 Records as required in condition 8.2 were not available at time of inspection, however JONES noted that all records are sent to the Whitehorse main station.

Corrective Action/Follow-up

- 1. Permittee is requested to confirm condition 4.3 is being met at the Faro station with regards adequate equipment installation to 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.
- 2. Permittee is requested to meet condition 6.1 (a-f) or 6.2 (a-b) with regards to the Complaint Management System. Follow-up with an environmental protection analysts regarding 6.1 and 6.2 is required.
- 3. Permittee is requested to provide an example of the records collected as noted in condition 8.2 (b).
- 4. Permittee is requested to provide all records since issuance of this permit May 11th 2022, pertaining to conditions 8.2(c), (d) and (e).

Please provide all required corrective action/follow-up to the undersigned officer no later than November 25th 2022.

Where applicable please follow up with Sarah Preiksaitis, environmental protection analyst at sarah.preiksaitis@yukon.ca.

| INSPECTOR | RECEIVED BY |
|------------------------------|---------------|
| Signature: Gurliffics | Signature: |
| Printed Name: Emily Sessford | Printed Name: |

