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

Cc: Elizabeth.Barker; Shannon Mallory (shannon.mallory@yec.yk.ca); Sarah.Preiksaitis

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

Date: December 13, 2022 11:56:00 AM

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

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

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).

<u>Response:</u> 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

From: Travis Ritchie

Sent: December 9, 2022 12:53 PM

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

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@yukon.ca>;

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

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





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:

- 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
 - a. 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 Alto

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

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

Date: March 28, 2023 10:31:51 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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Please consider the environment before printing this e-mail

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:

 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.

Cheers, Liz



Elizabeth Barker

Environmental Protection Analyst Environment | Standards & Approvals T 867-667-5456 | Yukon.ca

