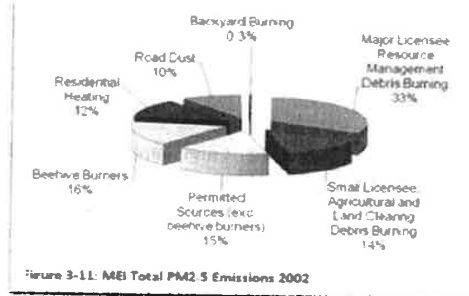
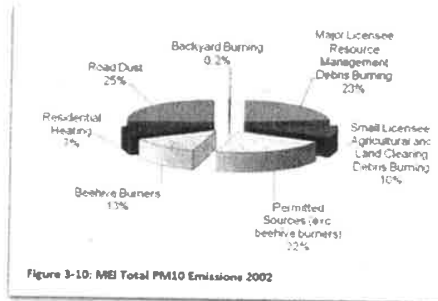


2/2



Northern Health supports the Clean Air Plan (BVLD Air Shed Management Plan: A Community Action Plan for Clean Air 2012) developed by the BVLD Air Shed Management Society and recognized that there are multiple sources that need to be carefully managed within the region. We also support an updated Micro Emissions Inventory be conducted in order to inform air shed management prioritization based on the most significant emission sources.

Regarding the pending permit application by NEWPRO to become a pellet plant:

At this time, the application by NEWPRO has not been submitted to the Ministry of the Environment (MoE). We will be reviewing the information provided by MoE on the details of the permit amendments, as well as their assessment of the validity of the industry's technical report and projected impacts to the air shed as they come available and will be providing further recommendations at that time. As per our conversation with the MoE, this will most likely not occur until the fall of 2015.

We recommend that the MoE include historical air quality data in their review in order to determine whether a significant shift in air quality occurred subsequent to the NEWPRO particle board plant shut down. It should be noted that NEWPRO currently holds an open permit for the particle board plant. Although they shut down due to economic reasons, technically they have the ability to restart those operations at any time under their current permit. If the application to transform the particle board plant into a pellet plant is accepted, the new technology intended to be used for the pellet plant will likely result in significantly less emissions than the particle board plant used to emit.

Should the MoE approve the new permit application, we recommend that the MoE consider clauses attached to the permit requiring additional air quality monitoring. Of note, communities should become aware of the recent changes in monitoring instruments from the TEOM (Tapered Element Oscillating Microbalance) to the FEM (Federal Equivalent Method), which is a much more sensitive and accurate monitor. As such, in communities such as Smithers where the shift in instrumentation has recently occurred we saw a notable increase in the measured levels of particulate matter (due to the increased precision of the instrument as opposed to actual increased levels of air pollution) and expect to see similar findings in other communities across the north once they too have switched over to the FEM monitors.

Thank you for the opportunity to provide our comments.

Sincerely,

Dr. Sandra Allison MPH CCFP FRCPC
 Chief Medical Health Officer
 Adjunct Professor, School of Health Sciences, UNBC
 Northern Health

Dr. Raina Fumerton MPH
 Medical Health Officer, Northwest HSDA
 Northern Health

copy: Raina Fumerton, Medical Health Officer, Northwest HSDA
 Cathy Ulrich, Chief Executive Officer
 Doug Quibell, Regional Manager, Environmental Health

Darrell Belanger, Environmental Health Officer, Smithers
 Barb Oke, Lead, Health and Resource Development
 Angela Wheeler, NI Team Lead - Environmental Health