

**Delegation to Clarington Council
September 13, 2021**

**Amendments to O. Reg 79/15 to Further Streamline the
Use of “Alternative Low-Carbon Fuels” (aka Garbage)**

Environmental Registry Posting

<https://ero.ontario.ca/notice/019-3544>

“Proposal Details” From Posting

<https://ero.ontario.ca/notice/019-3544>

More specifically, the proposed amendments would:

1. modernize the process for ECA amendments and provide proponents with the option to rely on secondary or tertiary sources to estimate CO₂ emission intensity
2. increase the limit of alternative low-carbon fuels in demonstration projects from 100 tonnes per day to 200 tonnes per day
3. remove out-dated quarterly reporting requirements for SO₂ and NO_x
4. remove dead animals or dead animal parts from the list of restricted low-carbon fuels to allow materials such as bone meal and animal fat to be used as a fuel source

Proposing to Remove Requirement for Proponent to Test **Actual** Waste Samples for CO₂ Emission Intensity

1. modernize the process for ECA amendments and provide proponents with the option to rely on secondary or tertiary sources to estimate CO₂ emission intensity

St Marys' Study Found Slightly Higher CO2 Emissions When Burning ALCF compared to Conventional Fuels in Dec 2018

Table E-1-1: Summary of Kiln Stack Emissions

Contaminant	CAS Number	Kiln Stack Emission Rate (g/s)			Alt Fuel Emissions Outside the Baseline Normal Range (Yes/No)	Statistically Significant Change in Emissions between Alt Fuel and Baseline/Post Baseline? (Yes/No)
		Baseline (Oct 2018)	Alt Fuel (Dec 2018)	Post Baseline (Dec 2018)		
Particulate						
PM	PM	2.02E+00	4.17E+00	4.12E+00	Yes	Yes
PM10	PM10	4.61E-01	5.08E-01	3.86E-01	Yes	Yes
PM2.5	PM2.5	1.84E-01	2.12E-01	1.75E-01	Yes	Yes
Combustion Gases						
NO _x	10102-44-0	8.94E+01	8.67E+01	9.73E+01	Yes	Yes
SO ₂	7446-09-5	1.37E+02	1.69E+02	1.14E+02	Yes	Yes
CO	630-08-0	1.19E+02	1.00E+02	7.49E+01	No	n/a
CO ₂	124-38-9	5.96E+04	5.59E+04	5.51E+04	No	n/a

BCX Environmental Consulting, *Alternative Fuels Demonstration Project Summary Report* (May 2019), Table E-1-1 (page 698 of pdf)

<http://www.stmaryscement.com/Alternative%20Low%20Carbon%20Fuels%20Documents/Demonstration%20Permit%20-%20Air%20-%20ECA%204614-826K9W.pdf>

More (not Less)

Direct (not Secondary, Tertiary Sourced)

Monitoring Requirements Necessary to Verify
Claims Practice Reduces Greenhouse Gases

- Regulation 79/15 does not require CO2 monitoring to verify GHG reduction goals
- St Marys Amended ECA (March 31 2021) does not require such monitoring, but Lafarge Bath ECA (December 2021) does

Removes Public Consultation For Proponents Increasing Waste Capacity and Adding New Waste Fuels; A Serious Concern For Clarington

Under the current framework, once an Environmental Compliance Approval has been issued, if a proponent would like to add new low carbon fuels (which have not been previously approved) or increase the maximum daily quantity of previously approved fuels, they are required to complete the public consultation requirements (e.g. two public meetings) prior to amending their approval. The proposed changes would remove the upfront consultation requirements to align with the current Environmental Compliance Approval amendment process for other sectors. The requirements for public consultation would be maintained through the Environmental Registry of Ontario for a minimum 30-day public commenting period.

<https://ero.ontario.ca/notice/019-3544>

Proposing to Remove Nox and SO2 Reporting (and Monitoring?) Requirements

Flexibility for NO_x and SO₂ emissions reporting for non-demonstration projects

Quarterly reports for NO_x and SO₂ emissions are currently a requirement for non-demonstration projects under *O. Reg. 79/15*. This monitoring was originally put in place because of the NO_x and SO₂ emissions trading program (*O. Reg. 194/05: Industry Emissions – Nitrogen Oxides and Sulphur Dioxide under the Environmental Protection Act*).

The province has since revoked *O. Reg. 194/05* (effective Feb 5, 2021) to end the outdated program because in its current form, it was no longer effective in reducing emissions from regulated sectors (ERO# 019-1233). Although the ministry is proposing to remove the prescriptive quarterly reporting requirements for NO_x and SO₂ emissions in *O. Reg. 79/15*, the ministry would still have director authority and discretion to impose conditions in the Environmental Compliance Approval to require monitoring and reporting on a site-specific basis.

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Other Proposed Amendments

2. increase the limit of alternative low-carbon fuels in demonstration projects from 100 tonnes per day to 200 tonnes per day
4. remove dead animals or dead animal parts from the list of restricted low-carbon fuels to allow materials such as bone meal and animal fat to be used as a fuel source

ANOTHER NEW St Marys Posting

<https://ero.ontario.ca/index.php/notice/019-4320>

St. Marys Cement Inc. (Canada)

Instrument type: **Environmental Compliance Approval (air)**

ERO number	019-4320
Ministry reference number	2261-C5XHS2
Notice type	Instrument
Act	Environmental Protection Act, R.S.O. 1990
Posted by	Ministry of the Environment, Conservation and Parks
Notice stage	Proposal
Proposal posted	September 10, 2021
Comment period	September 10, 2021 - October 25, 2021 (45 days) Open
Last updated	September 10, 2021

The amendment includes the installation of an ultimate cell continuous combustion unit.