

Delegation to Works Committee
Re 7.1 a) Report 2024 INFO 55
Spring 2024 DYEC Stack Test

By Linda Gasser

October 2, 2024.

Staff Report INFO 55 – NOT the whole picture when it comes to Dioxins & Furans

- Stack test results are a snap shot in time of the DYEC emissions over the testing periods.
- For Dioxins & Furans, stack testing taken place for 3 four hour test periods, twice a year.
- Report INFO 55 itself does not mention the “issues” with Dioxins and Furans stack test Run 3 for Boiler 2.
- Report Attachments from external consultants describe that the 3rd test for Boiler 2 had to paused due to other than normal conditions and then restarted.

Staff “Interpretations” of Stack Testing results are inappropriate

- Staff wrote:

5.1: *“DYEC demonstrates consistent performance with the appropriate controls and monitoring in place with **provide a level of safety and protection to human health and the environment.**”*

5.2: *“The results of testing completed from 2019 – 2024 are presented in Attachment 4. **The data presented indicates that the DYEC has consistently demonstrated that it operates safely and effectively within Schedule C limits.**”*

5.3: *“ A table comparison of the latest source testing results against ECA limits and A-7 guideline is presented in Attachment 5 which shows the DYEC **consistently** operates and performs below regulatory limits.”*

- No one should infer from stack test results that these results are representative of **ongoing operations** at the DYEC 24/7/365 and definitely not with staff excluding years 2015 & 2016 when DYEC stack tests failed.
- Engineers have professional obligations not to opine beyond their scope of expertise and especially not when addressing political decision makers and the public.

Fall 2023 Source Test issues for Dioxins & Furans Report 2024 INFO 17 (March 22.24 CIP)

- Similar staff comments in INFO 17:
- 4.4 DYEC demonstrates **consistent** performance with the appropriate controls and monitoring, **which provide safety and protection** for human health and the environment.
- 4.5 The results of testing completed from 2019-2023 are presented in Attachment #4. The data presented indicates that the DYEC has consistently demonstrated that it does **safely** and effectively operate within the ECA Schedule C limits.
- 4.6 A table comparison of the latest source testing results against the ECA limits and A-7 guideline is presented in Attachment #5, which shows DYEC **consistently operates** and performs below regulatory limits

Attachments to 2024 INFO 17 indicate there were issues with D & F source test

From Attachment 2, Page 2 of the Ausenco report:

- *Source tests for dioxin and furans for both Units 1 and 2 are typically run concurrently. However, it was necessary to take Unit 2 offline due to plugging of the feed chute for Boiler 2. The timing of this incident prevented Unit 2 from being tested concurrently with Unit 1. Unit 1 was tested on September 21st and 22nd , while Unit 2 was tested on October 3rd and 4th , 2023.*
- So, two types of “issues” occurred around two successive D & F stack testing programs.
- What happens outside pre-advised testing dates, rest of year??

Ortech Summary pg 1 shows two successive Compliance Tests (fall 2023 & spring 2024)

A list of the test programs conducted by ORTECH to date is provided below:

Test Program	Test Date	ORTECH Report No.
2015 Compliance	September/October 2015	21546
2016 Voluntary	May 2016	21656
2016 Compliance	October/November 2016	21698
2017 Voluntary	May 2017	21754
2017 Compliance	October 2017	21800
2018 Voluntary	May/June 2018	21840
2018 Compliance	September 2018	21880
2019 Voluntary	June 2019	21936
2019 Compliance	September 2019	21960
2020 Voluntary	June 2020	22001
2020 Compliance	November 2020	22050
2021 Voluntary	June 2021	22081
2021 Compliance	November/December 2021	22085
2022 Voluntary	May 2022	22158
2022 Compliance	November/December 2022	22160
2023 Voluntary	April 2023	22230
2023 Compliance	September/October 2023	22235
2024 Compliance	March 2024	22327

Source testing was performed on the Baghouse (BH) Outlet of Boiler No. 1 and BH Outlet of Boiler No. 2 for the test contaminants listed in Schedule D of the ECA.

ECA requires 1 compliance Source Test annually.
Durham does 2nd “Voluntary” test usually spring

- Please ask staff WHY two successive compliance tests were done i.e. were they required by MECP to do this or other explanation.
- Ask when the Fall 2024 Source Test will occur and will it also be a compliance test?
- The EFW business case Report 2008-J-13 pg 31 stated: *The RFP will also require routine quarterly or semi-annual stack testing of regulated contaminants that can not be continuously monitored*
- There was an attempt to kill off the voluntary stack test a few years ago, which thankfully did not pass.

DYEC website -complete Stack Test info & all consultants' reports must be posted incl. MECP ST correspondence

- Challenging for citizens or councillors to find and track stack test reports and related data.
- Automated notifications to web page subscribers erratic. I have reported this to staff numerous times over last couple years.
- Only after I contacted staff ON Sept. 23rd was the Ortech report posted. **Readers also need access** to Staff report & Consultants' reports attached – which are posted to CIPs but NOT to DYEC website.
- There's a tab for Ministry Correspondence on the DYEC Air Emissions pages, but the most recent correspondence is from Feb. 2021
- Staff should be posting their pre-test plan submission to MECP along with MECP response(s), and then their post test submission letter to MECP & response. **COUNCILS & PUBLIC NEED THE WHOLE PICTURE.**
- **THANK YOU FOR YOUR ATTENTION – QUESTIONS?**