

Shaun Stevenson,
President and CEO,
Prince Rupert Port Authority (PRPA)
by email to pcorp@rupertport.com and sstevenson@rupertport.com

October 15th, 2018

Hello Shaun,

Congratulations on the position you took over this summer. We look forward to watching you build upon PRPA's tremendous resources, talented people and history of accomplishments.

We are writing to draw your attention to local environmental protection issues which need new leadership. We believe solutions can be found, but perhaps there need to be some changes:

- We are aware of many noise complaints going to different people within PRPA over the last few years, but no record has being kept of them and no one seems to have both the responsibility and the resources to do what needs to be done to pinpoint and solve noise issues
- The decision to locate a permanent air quality monitoring station at Fairview was undertaken without anyone from PRPA first comparing past air quality monitoring results there with those from Westview/Water St. even though the monitoring results we have obtained suggest to us, that Westview has far higher levels of NO₂ (see our volunteer's analysis below). Has PRPA given enough resources to the important issue of air quality monitoring and mitigation?
- The Wolverine assessment and Fairview expansion are going on without anyone knowing if residents in the Graham/Water St. area are already at risk. Our analysis below suggests that the short-term NO₂ levels there were only 17 ppb from future objectives in the summer of 2013 and we are concerned added emissions from a major Fairview expansion and the opening of the pellet terminal since then may have pushed levels too high. This does not meet the standard that people in Prince Rupert expect of PRPA and it does not appear to meet the requirements of an undertaking by PRPA, reported in the 2012 Fairview Comprehensive Study Report: to monitor to protect public health.
- Readily available technology exists to deal with short-term NO₂ issues but is PRPA monitoring to find out if and where this technology is needed to protect families?

Is there a culture within PRPA which you can change?

- from "the benefits of increased jobs from industrial expansion make environmental impact insignificant" to "we can solve noise issues"
- from "other ports have worse air pollution than we do" to "we can meet the highest standards"

- from “residents shouldn’t complain” to “ help us pinpoint the issues so we can address them”

Most urgently, please look into the ambient NO2 issues now, when Wolverine is being considered, we need you to win PRPA’s engagement, talent and innovation for environmental issues:

“My off-the-cuff opinion is that increased locomotive traffic on the rail lines beside Water Street could push the maximum ambient NO2 concentration to above 40 ppb in the adjacent Graham Avenue area of Prince Rupert. But to quantify a maximum expected NO2 concentration would require a fairly extensive study. For sure there is technology to significantly reduce NOx emissions from idling locomotives or to replace them with hybrid switchers, etc.” - Gordon Esplin, M.Sc., P.Eng. Genesis Engineering Inc., 314 - 155 East 5th Street, North Vancouver, BC, V7L-1L3, gesplin@shaw.ca

Several of our volunteers would be willing to help with PRPA efforts towards better air quality and noise reduction, be sure to let us know if we can help.

Sincerely,

Carol Brown,
President, Prince Rupert Environmental Society
Presenting concerns of our Air Quality (and noise) Committee
carolbro@citytel.net

see attachment below

Westview/Water St. Location has by far the highest short-term NO2 levels and the highest annual NO2 levels

Prepared by L. Roth July 2018

<p>Measured Levels of NO2 Concentration for three monitoring stations during summer: Westview/Water St., Pineridge and Fairview</p>

Location and Year	(Short-term)	(Annual)
<p><u>2013 was prior</u> to increased emissions re: Fairview expansion and the opening of pellet terminal</p>	<p>98th percentile of the daily maximum 1-hour averages ppb CAAQS 2025¹ is 42²</p>	<p>Average of all the 1-hour averages ppb CAAQS 2025 is 12³</p>
2013 ⁴ Westview/Water St	25 ⁵	5.5 ⁶
2017 ⁷ Fairview	14 ⁸	4.0 ⁹
2017 ¹⁰ Pineridge	13 ¹¹	1.5 ¹²

¹ Canadian Ambient Air Quality Standards (CAAQS) <http://gazette.gc.ca/rp-pr/p1/2017/2017-12-09/html/notice-avis-eng.html>

² The 2025 CAAQS for short-term NO2 is 42ppb and for 2020 it is 60 ppb. It is defined as the 3 year average of the annual 98th percentile of the daily maximum 1-hour average concentrations. None of the monitoring stations were in place for 3 years, so the table shows the 98th percentile for the periods noted for them.

³ The 2025 CAAQS for annual NO2 is 12 ppb and for 2020 it is 17 ppb. It is defined as the average over a single calendar year of all the 1-hour average concentrations. The Table shows the average for the period monitored in the case of Westview and for the periods specified for Fairview and Pineridge.

⁴ Westview/Water St. from April 14-August 16, 2013 (all the data available)

⁵ Estimated from 1-hr NO2 time-series in Joe Rector's June 15 2018 PRPA letter

⁶ Converted from 10.25 µg/m3 from page 76 PRAS. Joe Rector's June 15th 2018 PRPA letter gives this average as 5.2 ppb

⁷ July 26-October31 2017 is the period used for annual. If we used this period to estimate the short-term it would be 18, however we used a cut off of Aug 16 instead of Oct 31, to be comparable to Westview, because there is a significant increase (possibly 35%) in short-term (daily maximums) from summer to winter.

⁸ Estimated from 1-hr NO2 time-series in Joe Rector's June 15 2018 PRPA letter from July 26-Aug 16 2017

⁹ Estimated from Q3 simplified box plots Joe Rector's June 15th 2018 PRPA letter

¹⁰ From April 1-July 26 2017 for annual and from April 14-July26 2017 for short-term to be comparable to Westview

¹¹ Estimated from 1-hr NO2 time-series in Joe Rector's June 15 2018 PRPA letter from Apr 14-July 26 2017

¹² Estimated from Q2 simplified box plots Joe Rector's June 15th 2018 PRPA letter