Five protections.
Before emissions begin.

Proposed regulatory requests | Application 455458 | For review

Sound Moms advocates a project pause until one year of independently reviewed baseline monitoring is complete. For this air authorization, the specific request is to prevent commissioning flaring and operational emissions until the baseline and other required protections are accepted.

01 / A full year of baseline data

Complete and independently review 12 consecutive months of representative ambient-air data before commissioning flaring or operational discharges begin.

02 / Independent monitoring with public results

Finalize the ambient-air programme, operator, locations, funding, data access and independent publication arrangements before relevant emissions begin.

03 / A current review of family health

Require a documented, independently reviewed health-assessment update addressing pregnancy, infancy, childhood and respiratory sensitivity across relevant scenarios.

04 / Defined controls for failures and venting

Set explicit operating bounds, notification requirements and safe curtailment or shutdown criteria for prolonged or repeated abnormal releases.

05 / Action when measurements challenge assumptions

Make data quality, public alerts, investigations and corrective actions part of the authorization, with named responsibilities and deadlines.

THE REGULATORY BASIS

Environmental Management Act section 14(1)(c)-(e) allows permit requirements for monitoring, studies, reporting and analytical procedures. The wording on the following pages is proposed for project-specific legal and technical review. It is not an existing permit, a legal opinion or an assurance that every request will be adopted.

Environmental Management Act, section 14(1)(c)-(e)

Ask for a written decision on every requested protection: adopted, modified or declined, with reasons, evidence, responsible authority and timing. A broader construction pause requires a separate authority-by-activity analysis.

Evidence to condition

A traceable request: source, proposed wording, proof and decision owner. All application page references use the complete PDF counter, cover = page 1.

EVIDENCE & LIMITATION	PROPOSED CONDITION FOR REVIEW	PROOF & DECISION OWNER
C1 / A full year of baseline data The October 2026 application says the community monitoring programme is under development. The assessment uses earlier regional monitoring data; these passages do not demonstrate a completed independent 12-month baseline for all four communities. PDF p 94 | PDF p 119 | PDF p 120 TAR p 46; TDR pp 9-10	The permittee must not commence commissioning flaring or operational discharges under this authorization until the Director has accepted a published, independently reviewed baseline report covering 12 consecutive months of representative ambient-air monitoring. The approved design must specify sites, pollutants, methods, seasonal completeness, quality assurance and remedies for missing data. **Keep accurate:** A proposed condition, not a verified existing one-year rule. Construction activity must be recorded and accounted for; current data would be pre-commissioning, not a pristine pre-construction baseline.	A dated baseline dataset, independent review, public acceptance criteria and written regulatory acceptance before the relevant emissions begin. **Decision / input:** BCER decision-maker for this air authorization; other authorities for a broader project pause.
C2 / Independent monitoring with public results The application describes source monitoring and an existing Squamish station, while it describes the receiving-environment programme as still being developed. These are different monitoring functions. PDF p 61 | PDF p 93 | PDF p 94 TAR pp 13 and 45-46	Before relevant discharges begin, the permittee must implement a Director-approved ambient-air monitoring programme with a suitably qualified independent operator and auditor, protected funding, disclosed conflicts, community input on siting, raw-data access, quality flags and independent reporting and publication rights. Any excluded community must have a published representativeness rationale. **Keep accurate:** Distinguish the independent ambient-air operator from other monitoring roles. Existing provincial and Indigenous monitoring must be acknowledged; request written confirmation of each role and appointment status.	Approved plan, signed operator and audit arrangements, site map, pollutant list, commissioning records and a public data-release schedule. **Decision / input:** BCER for permit requirements; qualified monitoring specialists for technical design, with the relevant Nations and health authorities engaged.

Health and abnormal operation

A current review and clear bounds on releases.

EVIDENCE & LIMITATION	PROPOSED CONDITION FOR REVIEW	PROOF & DECISION OWNER
C3 / A current review of family health No updated standalone human-health risk assessment is included. A current health discussion and updated organic-pollutant screening exist; the screening tables shown concern normal and stabilizing operation. PDF p 83 | PDF p 84 | PDF p 112 | PDF p 243 | PDF p 244 | PDF p 245 TAR pp 35-36; TDR p 2; DMP Appendix B pp B-1-B-3	Before commissioning discharges, the permittee must submit a current health-assessment update, independently reviewed by relevant specialists, showing how the final design, relevant compounds, commissioning, abnormal releases and combined exposures are addressed for sensitive groups. The decision-maker must publish the adequacy finding, remaining uncertainties and any required additional assessment. **Keep accurate:** Earlier health assessment is not absent. General air-pollution research and the Texas flaring study cannot be converted into a local risk percentage.	Scenario-by-pollutant coverage table, sensitive-group rationale, local receptor results, independent comments and responses, and a documented adequacy decision. **Decision / input:** BCER determines information needed for the permit; seek input from Vancouver Coastal Health and qualified perinatal, paediatric and toxicology reviewers.
C4 / Defined controls for failures and venting The assessment uses two oxidizer outages and 96 total hours annually as assumptions. It also represents a locally vented condensate stream at the flare stack. The significance of that simplification needs analysis. PDF p 60 | PDF p 126 | PDF p 127 | PDF p 128 | PDF p 129 | PDF p 149 | PDF p 150 | PDF p 151 TAR p 12 and footnote 1; TDR pp 16-19 and 39-41	The authorization must specify the permitted frequency, duration and conditions of abnormal releases, event records, notification deadlines, troubleshooting limits and engineer-defined safe curtailment and restart requirements. Before these conditions are finalized, the permittee must demonstrate that actual release locations and credible overlapping sources are adequately bounded, revising the assessment where necessary. **Keep accurate:** Two outages and 96 hours are modelling assumptions, not automatically binding limits. Numerical limits and safe response sequences need technical justification; necessary emergency safety actions must be addressed.	Explicit permit clauses, actual-source sensitivity results, event-classification rules and a regulator-accepted response and restart protocol. **Decision / input:** BCER for conditions and compliance; qualified process-safety and dispersion specialists for the technical basis.

Conditions that lead to action

Verify what happens and specify the response.

EVIDENCE & LIMITATION	PROPOSED CONDITION FOR REVIEW	PROOF & DECISION OWNER
C5 / Action when measurements challenge assumptions Source-monitoring methods are described, but the cited passages do not set out the complete community-specific response programme. The fine-particle baseline excludes identified wildfire days. PDF p 61 | PDF p 93 | PDF p 94 | PDF p 119 | PDF p 120 TAR pp 13 and 45-46; TDR pp 9-10	Before relevant emissions begin, the permittee must implement an approved trigger-and-response plan covering validated exceedances, material departures from model assumptions, repeated outages, monitoring gaps and high-background episodes. Each trigger must identify the decision-maker, notification and investigation deadlines, corrective actions, and criteria for safe curtailment or restart where warranted. Publish findings and closure evidence on a defined schedule. **Keep accurate:** Monitoring verifies performance and informs action; it does not replace emission controls. Match pollutant, location, averaging period and statistic when interpreting a trigger.	A public trigger table, time-stamped notices, quality-assured data, incident records, corrective-action deadlines and documented closure. **Decision / input:** BCER for enforceable requirements; operator and independent monitor for implementation, with health-authority input on alerts.

Keep a written answers register

Record the date sent, numbered question, recipient, supporting source, answer, promised action, due date and closure evidence. Provincial notification guidance describes responding to concerns and documenting comments and responses. Ask BCER to confirm the applicable process and publication arrangements; guidance does not replace legislation.

Provincial notification guidance, November 2023, PDF p 2 / Environmental Protection Notice

Confirm the closing date directly with BCER. Submit promptly even if requesting an extension. The notice states that respondents' identities and submission contents become part of the public record.