

BY EMAIL ONLY

March 8, 2019

Neil Young

**PURE ENVIRONMENTAL WASTE MANAGEMENT LTD.**

**APPLICATION NO. 1911539**

**STATEMENT OF CONCERN NO. 31277**

Dear Neil Young:

You are receiving this letter because you filed a statement of concern about Application No. 1911539. The Alberta Energy Regulator (AER) has reviewed your statement of concern, along with the company's application, and all applicable requirements and other submissions or information about the application. The AER has decided that a hearing is not required to consider the concerns outlined in your statement of concern.

In our review of your concerns, we considered the following:

- Your lands and residence are located more than 4 kilometers from the proposed waste management facility.
- Your concerns relating to traffic volumes and spills on roads by third party trucking companies are outside the scope of the application and outside the jurisdiction of the AER, and should be addressed by Alberta Transportation or the local municipality, as applicable. Pure Environmental Waste Management Ltd. (Pure) has indicated that a roadside development permit application (18-D9-011) was approved by Alberta Transportation to construct, operate and maintain a new access on Highway 892.
- Regarding your concerns relating to venting from truck off-loading at the site, Pure has indicated that it will employ a closed loop unloading system where trucks will be directly unloading fluids into piping and associated process vessels, and all fluid and product transfers will be contained and transferred within a closed system. Pure must also comply with the requirements in *Directive 060: Upstream Petroleum Industry*

*Flaring, Incinerating, and Venting*, including requirements specifically aimed at preventing off-lease odours.

- Regarding your concerns about spills and releases at the site, Pure is required to meet all AER environmental and regulatory requirements. The operator of a facility from which the spill or release occurred must immediately take reasonable steps to contain and clean up the spill or release and shall ensure that the spilled or released material is processed in the operator's facilities, if appropriate, or is treated or disposed of, or both, in accordance with Directive 058.

Based on the above, the AER has concluded that it is not necessary to hold a hearing before making a decision on the application. The AER has issued the applied-for approval and this is your notice of that decision. A copy of the approval is attached.

All AER-regulated parties must comply not only with the conditions of their authorizations, but with all of the AER's regulatory requirements. To ensure industry compliance the AER has developed its *Integrated Compliance Assurance Framework*, which embodies the three main components of all effective compliance assurance programs, those being education, prevention, and enforcement. You can find out more about how the AER verifies industry compliance and responds to noncompliance here: <https://aer.ca/regulating-development/compliance/compliance-assurance-program>.

You may file a regulatory appeal on the AER's decision to issue the approval if you meet the criteria within section 36 of the *Responsible Energy Development Act*. Filing instructions and forms are on our website under Regulatory Appeal Process.

If you have any questions, contact Yvonne Chow at [Yvonne.Chow@aer.ca](mailto:Yvonne.Chow@aer.ca).

Sincerely,

<Original signed by>

Rob Cruickshank  
Director, Business Process

Enclosure: Approval (1)

cc: Donovan Baillie, Pure Environmental Waste Management Ltd.  
AER SOC Assessor  
AER Bonnyville Field Centre