

November 28, 2022

File No.: 001-484778

Scott McLean  
Executive VP, Operations  
Rimrock Renewables Ltd.  
900, 222 3rd Avenue SW  
Calgary, AB T2P 0B4

Dear Mr. McLean:

**Subject: Rimrock Renewables Ltd. – *Environmental Protection and Enhancement Act*  
Application No. 001-484778 – Supplemental Information Request**

Alberta Environment and Protected Areas (AEPA) has reviewed application no. 001-484778. The following supplemental information is required to proceed the application review:

1. A table listing all of feedstock to be received and processed. For details please refer to Appendix B, MOU as described in the above application.
2. A table showing all potential odour generating sources including point sources, area sources and fugitive sources; and characterization of odours.
3. An evaluation of alternatives for minimization of odours generating from the following sources:

- manure storage building
- organic food resource tanks,
- digestate separation building
- solid digestate staging area with garage opening
- solid digestate storage area
- liquid digestate pond
- transportation of manure, organic food waste and digestate

The evaluation should be carried out in accordance with the *Industrial Release Limits Policy* so that the most effective demonstrated odour prevention, containment and control equipment /technologies are adopted.

4. The design plans and specifications of the selected odour prevention, containment and control equipment.
5. The design plans and specifications of the manure storage building and the digestate separation building with respect to odour containment and control.
6. An odour study report using air dispersion modelling to be conducted in accordance with the *Alberta Air Quality Model Guideline* (Guideline), dated Nov.15, 2021. Please include the locations of all sensitive receptors in the isopleths and refer to Appendix B of the Guideline for details.
7. A proposal for odour monitoring program.
8. A proposal for odour complaint management and response program.
9. A proposal for the best odour management practices control plan including, at a minimum, all of the following:

- procedures for the proper operation and maintenance of all air pollution abatement equipment and the associated monitoring devices to meet the design intent;
  - procedures for minimizing odour release to the atmosphere during the period of time when the proposed facility is starting up, shutting down or under any maintenance;
  - procedures for minimizing fugitive odour emissions, particularly intermittent sources involving agitation of material, vehicles waiting to unload or load, air displacement from loading the storage tanks, any maintenance that requires opening storage tanks, digesters and building doors;
  - corrective actions to be taken when operating parameters deviate from the established operating ranges; and
  - measures to prevent the anaerobic condition in the solid digestate storage pile and the liquid digestate pond.
10. A proposal for keeping out vectors (e.g. birds, insects and vermin).
11. A process flow diagram including:
- all of major processing and storage units and the control processes;
  - daily design and normal operating capacities of each processing unit, storage tank and air pollution abatement equipment; and
  - operating parameters and performance indicators of major processing and storage units and air pollution abatement equipment.
- Please refer to section 5.1 of the *Guide to Content for Industrial Approval Applications* for details.
12. A description of management of industrial wastewater such as the building floors and vehicles washing water and the solid digestate pile seepage.
13. A confirmation of whether the primary cell is to store only the industrial run-off.
14. Specifications of the two co-generation units and the boiler with respect to their air emission rates and control.
15. A description of NO<sub>x</sub> control technologies to be used for the two co-generation units.
16. An evaluation of continuous monitoring of NO<sub>x</sub> at Stacks 2 and 3 in accordance with the *Continuous Emission Monitoring System (CEMS) Code*.
17. Copy of the AUC approval for the co-generation units.

Please respond to the above supplemental information request directly to me as soon as possible but no later than January 30, 2023. Should you have any questions or concerns please contact Ping Zhao at 403-297-8290 or at [ping.zhao@gov.ab.ca](mailto:ping.zhao@gov.ab.ca).

Yours truly,

Ping Zhao, P.Eng.  
Industrial Approvals Engineer