

**ENVIRONMENTAL COMPLIANCE APPROVAL**

NUMBER: 0001111506

Version: 1.0

Issue Date: 06/26/2019

Pursuant to section 20.3 of the Environmental Protection Act, R.S.O. 1990, c. E. 19 and subject to all other applicable Acts or regulations this Environmental Compliance Approval is issued to:

**Client Name:** RECLAIM SOLUTIONS INC.**Address:** Street Information: 121 FRANK LAMBIER Court  
City/Town: PALMERSTON  
Municipality: WELLINGTON NORTH  
State/Province: ONTARIO  
Postal Code: N0G 2P0  
Country: Canada

For the following site:

**Site Name:** 121 Frank Lambier Court**Site Location:** Street Information: 121 Frank Lambier Court  
Postal Code: N0G 2P0  
City/Town: Palmerston  
Municipality: WELLINGTON NORTH  
State/Province: ONTARIO  
Country: CANADA  
MECP District/Area Office: Guelph District Office

This Environmental Compliance Approval includes the following:

<b>Section</b>	<b>Contents</b>
1	Activity Description
2	Definitions
3	Terms and Conditions
4	Reasons
5	Schedules

**Section 1: Activity Description**

*You have applied under section 20.2 of Part II.1 of the Environmental Protection Act, R.S.O. 1990, c. E. 19 (Environmental Protection Act) for approval of:*

A reclaimed metal manufacturing facility with the following sources:

- one (1) natural gas fired burn-off oven with a primary burner having a nominal heat input rating of 1,055,000 kilojoules per hour and operating at temperatures ranging from 399 to 455 degrees Celsius

and with an afterburner having a nominal heat input rating of 1,055,000 kilojoules per hour and operating at a nominal temperature of 788 degrees Celsius, discharging into the air through a stack, having an exit diameter of 0.41 metre, extending 4.74 metres above the roof and 11.24 metres above grade;

- one (1) natural gas fired zinc furnace with a maximum heat input rating of approximately 322,000 kilojoules per hour, discharging into the air through the dust collector baghouse;
- one (1) dust collector baghouse serving the furnace, ball mill and wire chopper, discharging into the air at a volumetric flow rate of 1.89 cubic metres per second through a stack, having an exit diameter of 0.51 metre, extending 5.49 metres above grade;

all in accordance with the Application for Approval (Air & Noise) submitted by the *Company*, dated November 1, 2018 and signed by Mark Reynolds, and the supporting information, including the Emission Summary and Dispersion Modelling Report, prepared by GHD Limited and dated October 30, 2018, and an Acoustic Assessment Report prepared by GHD Limited, dated October 30, 2018 and signed by Erik Martinez, and all other information and updated information associated with the application.

## **Section 2: Definitions**

*For the purpose of this environmental compliance approval, the following definitions apply:*

1. "*Acoustic Assessment Report*" means the report, prepared in accordance with *Publication NPC-233* submitted in support of the application, that documents all sources of noise emissions and *Noise Control Measures* present at the *Facility*. "*Acoustic Assessment Report*" also means the Acoustic Assessment Report prepared by GHD Limited, dated October 30, 2018 and signed by Erik Martinez;
2. "*Company*" means Reclaim Solutions Inc., that is responsible for the construction or operation of the *Facility* and includes any successors and assigns;
3. "*Equipment*" means the equipment and processes described in the *Company*'s application, this *Approval* and in the supporting documentation submitted with the application, to the extent approved by this *Approval*;
4. "*Noise Abatement Action Plan*" means the noise abatement program developed by the *Company*, submitted to the *Director* and *District Manager* and approved by the *Director*, designed to achieve compliance with the sound level limits set in *Publications NPC-300*. It also means the *Noise Abatement Action Plan* prepared by GHD Limited, dated October 30, 2018 and signed by Erik Martinez.
5. "*Noise Control Measures*" means measures to reduce the noise emissions from the *Facility* and/or *Equipment* including, but not limited to, silencers, acoustic louvres, enclosures, absorptive treatment, plenums and barriers. It also means the *Noise Control Measures* outlined in the *Noise Abatement Action Plan*;
6. "*Publication NPC-233*" means the *Ministry* Publication NPC-233, "Information to be Submitted for Approval of Stationary Sources of Sound", October, 1995, as amended;
7. "*Approval*" means this Environmental Compliance Approval, including the application and supporting documentation listed above;
8. "*Best Management Practices Plan*" means a document or a set of documents which describe measures to minimize dust emissions from the *Facility* and/or *Equipment*;

9. "*Director*" means any *Ministry* employee appointed by the Minister pursuant to Section 5 of the *EPA*;
10. "*District Manager*" means the District Manager of the appropriate local district office of the *Ministry*, where the *Facility* is geographically located;
11. "*Facility*" means the entire operation located on the property where the *Equipment* is located;
12. "*Manual*" means a document or a set of documents that provide written instructions to staff of the *Company*;
13. "*Ministry*" means the ministry of the government of Ontario responsible for the *EPA* and includes all officials, employees or other persons acting on its behalf;
14. "*Publication NPC-300*" means the *Ministry* Publication NPC-300, "Environmental Noise Guideline, Stationary and Transportation Sources - Approval and Planning, Publication NPC-300", August 2013, as amended.
15. "*Technical Bulletin: Management Approaches for Industrial Fugitive Dust Sources*" means the *Ministry* publication "Technical Bulletin: management approaches for industrial fugitive dust sources", March 8, 2017, as amended;
16. "*EPA*" means the Environmental Protection Act, R.S.O. 1990, c.E.19, as amended;

### **Section 3: Terms and Conditions**

*You are hereby notified that this environmental compliance approval is issued to you subject to the terms and conditions outlined below:*

#### **1. OPERATION AND MAINTENANCE**

1. The *Company* shall ensure that the *Equipment* is properly operated and maintained at all times.  
The *Company* shall:
  - a. prepare, not later than three (3) months after the date of this *Approval*, and update, as necessary, a *Manual* outlining the operating procedures and a maintenance program for the *Equipment*, including:
    - i. routine operating and maintenance procedures in accordance with good engineering practices and as recommended by the *Equipment* suppliers;
    - ii. emergency procedures, including spill clean-up procedures;
    - iii. procedures for any record keeping activities relating to operation and maintenance of the *Equipment*;
    - iv. all appropriate measures to minimize noise and odorous emissions from all potential sources; and
    - v. the frequency of inspection and replacement of the filter material in the *Equipment*;
  - b. implement the recommendations of the *Manual*;
  - c. operate the burn-off oven in such manner that:
    - i. the burner flame in the secondary chamber is established before the primary chamber is fired;
    - ii. the temperature in the secondary chamber is maintained at a minimum of 788 degrees Celsius at all times when the primary chamber is loaded and heat cleaning is in progress;
    - iii. the burner in the primary chamber is automatically turned off, if the secondary burner fails; and

- iv. no substances containing chlorinated and/or fluorinated compounds, including polyvinyl chloride and Teflon are loaded into the burn-off oven.

## 2. RECORD RETENTION

1. The *Company* shall retain, for a minimum of two (2) years from the date of their creation, all records and information related to or resulting from the recording activities required by this *Approval*, and make these records available for review by staff of the *Ministry* upon request. The *Company* shall retain:
  - a. all records on the maintenance, repair and inspection of the *Equipment*; and
  - b. all records of any environmental complaints, including:
    - i. a description, time and date of each incident to which the complaint relates;
    - ii. wind direction at the time of the incident to which the complaint relates; and
    - iii. a description of the measures taken to address the cause of the incident to which the complaint relates and to prevent a similar occurrence in the future.

## 3. NOTIFICATION OF COMPLAINTS

1. The *Company* shall notify the *District Manager*, in writing, of each environmental complaint within two (2) business days of the complaint. The notification shall include:
  - a. a description of the nature of the complaint; and
  - b. the time and date of the incident to which the complaint relates.

## 4. NOISE

1. The *Company* shall:
  - a. implement the *Noise Control Measures* as detailed in the *Noise Abatement Action Plan* of the *Acoustic Assessment Report* not later than twelve (12) months after the date of the *Approval*;
  - b. at all times, subsequent to the completion of the *Noise Abatement Action Plan*, ensure that the noise emissions from the *Facility* comply with the limits set out in *Ministry Publication NPC-300*;
  - c. ensure that the *Noise Control Measures* are properly maintained and continue to provide the acoustical performance outlined in the *Noise Abatement Action Plan* of the *Acoustic Assessment Report*.

## 5. FUGITIVE DUST CONTROL

1. The *Company* shall develop in consultation with the *District Manager*, a *Best Management Practices Plan* for the control of fugitive dust emissions. This *Best Management Practices Plan* shall:
  - a. at minimum, be prepared in accordance with *Ministry Technical Bulletin: Management Approaches for Industrial Fugitive Dust Sources*; and
  - b. include a list of all *Ministry* comments received, if any, on the development of the *Best Management Practices Plan*, and a description of how each *Ministry* comment was addressed in the *Best Management Practices Plan*.
2. The *Company* shall submit the *Best Management Practices Plan* to the *District Manager* not later than three (3) months after the date of this *Approval* or as otherwise indicated by the *District Manager*.

3. Upon acceptance of the *Best Management Practices Plan* by the *District Manager*, the *Company* shall immediately implement the *Best Management Practices Plan* for the control of fugitive dust emissions to provide effective dust suppression measures to any potential sources of fugitive dust emissions resulting from the operation of the *Facility*.
4. The *Company* shall update the *Best Management Practices Plan* as necessary or at the direction of the *District Manager*.

## **Section 4: Reasons**

*The reasons for the imposition of these terms and conditions are as follows:*

1. Condition No. 1 is included to emphasize that the *Equipment* must be maintained and operated according to a procedure that will result in compliance with the *EPA*, the *Regulations* and this *Approval*.
2. Condition No. 2 is included to require the *Company* to keep records and to provide information to staff of the *Ministry* so that compliance with the *EPA*, the *Regulations* and this *Approval* can be verified.
3. Condition No. 3 is included to require the *Company* to notify staff of the *Ministry* so as to assist the *Ministry* with the review of the site's compliance.
4. Condition No. 4 is included to provide the minimum performance requirement considered necessary to prevent an adverse effect resulting from the operation of the *Facility*.
5. Condition No. 5 is included to emphasize that the *Equipment* must be maintained and operated according to a procedure that will result in compliance with the *EPA*, the *Regulations* and this *Approval*.

## **Section 5: Schedules**

*N/A*

*In accordance with Section 139 of the Environmental Protection Act, you may by written Notice served upon me, the Environmental Review Tribunal and in accordance with Section 47 of the Environmental Bill of Rights, 1993, S.O. 1993, c. 28 (Environmental Bill of Rights), the Environmental Commissioner, within 15 days after receipt of this Notice, require a hearing by the Tribunal. The Environmental Commissioner will place notice of your appeal on the Environmental Registry. Section 142 of the Environmental Protection Act provides that the Notice requiring the hearing shall state:*

- a. The portions of the environmental compliance approval or each term or condition in the environmental compliance approval in respect of which the hearing is required, and;
- b. The grounds on which you intend to rely at the hearing in relation to each portion appealed.

*The Notice should also include:*

1. The name of the appellant;
2. The address of the appellant;
3. The environmental compliance approval number;
4. The date of the environmental compliance approval;
5. The name of the Director, and;
6. The municipality or municipalities within which the project is to be engaged in.

*And the Notice should be signed and dated by the appellant.*

*This Notice must be served upon:*

The Secretary\*  
Environmental Review Tribunal  
655 Bay Street, Suite 1500  
Toronto, Ontario  
M5G 1E5

AND

The Environmental  
Commissioner  
1075 Bay Street, Suite 605  
Toronto, Ontario  
M5S 2B1

AND

The Director appointed for the purposes of  
Part II.1 of the Environmental Protection  
Act  
Ministry of the Environment,  
Conservation and Parks  
135 St. Clair Avenue West, 1st Floor  
Toronto, Ontario  
M4V 1P5

**\* Further information on the Environmental Review Tribunal's requirements for an appeal can be obtained directly from the Tribunal at: Tel: (416) 212-6349, Fax: (416) 326-5370 or [www.ert.gov.on.ca](http://www.ert.gov.on.ca)**

*This instrument is subject to Section 38 of the Environmental Bill of Rights, 1993, that allows residents of Ontario to seek leave to appeal the decision on this instrument. Residents of Ontario may seek leave to appeal within 15 days from the date this decision is placed on the Environmental Registry. By accessing the Environmental Registry at [www.ebr.gov.on.ca](http://www.ebr.gov.on.ca), you can determine when the leave to appeal period ends.*

*The above noted activity is approved under s.20.3 of Part II.1 of the Environmental Protection Act.*

DATED AT TORONTO this 26th day of June, 2019

c: Mark Reynolds  
Erik Martinez



Jeffrey Mckerrall  
Director

Appointed for the purposes of Part II.1 of the  
Environmental Protection Act