

**AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL**

NUMBER 9345-BD4Q24

Issue Date: June 26, 2019

Sonoco Canada Corporation  
 33 Park Ave E  
 Brantford, Ontario  
 N3T 5T5

**Site Location:** 33 Park Avenue East  
 33 Park Ave E , Sonoco Canada Corporation  
 Brantford City, County of Brant  
 N3S 7R9

*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:*

- One (1) corn starch silo bin vent equipped with a polyester filter and reverse air jet cleaning mechanism, exhausting into the air, through a stack, having an exit diameter of 0.2 metre and extending 20.12 metres above grade;
- Eleven (11) exhaust stacks serving the mill building as described in Table 1;
- One (1) dust collector, equipped with a pulse jet mechanism and a flow rate of 1.56 cubic metres per second approximately, serving the paper slitting process, exhausting into the air, through vents under the truck weigh scale at ground level;
- One (1) cross-flow cooling tower with mist eliminator baffles and total water flow rate of 1,279 Litres per minute, discharging into the air through a stack, having an exit diameter of 2.74 metres and extending 5.1 metres above grade;

all in accordance with the Application for Approval (Air & Noise), submitted by Sonoco Canada Corporation, dated December 19, 2018 and signed by Ken MacDonald, plant manager, and the supporting information including the Emission Summary and Dispersion Modelling Report, submitted by OSB Consulting, dated December 7, 2018 and signed by Stuart Bailey and the Acoustic Assessment report prepared by HGC Engineering Limited, dated 23 October 2018 and signed by Corey Kinart, P.Eng..

Table 1: Board Mill Building Exhaust Stacks

Stack ID	Source Description	Flow Rate (cubic metres per second)	Temperature (Celsius)	Stack Diameter (metre)	Stack Height Above Grade (metre)
6	Welding and Grinding	1.4	25	0.41 x 0.94	6.7

	Area				
11	VAT Exhaust	13.21	42	1.0	12.8
15a	Dry Area Exhaust (1)	4.0	30	0.94	8.7
15b	Dry Area Exhaust (2)	14.2	30	1.42	10.3
15c	Wet Area Exhaust (1)	4.0	35	0.84	12.4
15d	Wet Area Exhaust (2)	4.0	35	0.84	12.4
15e	Wet Area Exhaust (3)	14.2	35	1.42	13.2
29	Pulper Exhaust	6.05	30	0.71	14.5
31	Wet Area Exhaust (4)	1.0	30	0.61 x 1.22	11.3
32	Wet Area Exhaust (5)	1.0	30	0.61 x 1.22	11.3
36	Quality Control Fume Hood (side vent)	0.17	25	0.15	6.86

*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 and Appendix A of the Basic Comprehensive User Guide, prepared by HGC Limited, dated 23 October 2018 and signed by Corey Kinart, P.Eng., submitted in support of the application, that documents all sources of noise emissions and *Noise Control Measures* present at the *Facility*;
2. "*Acoustic Audit*" means an investigative procedure consisting of measurements and/or acoustic modelling of all sources of noise emissions due to the operation of the *Facility*, assessed to determine compliance with the Performance Limits for the *Facility* regarding noise emissions, completed in accordance with the procedures set in *Publication NPC-103* and reported in accordance with *Publication NPC-233*;
3. "*Acoustic Audit Report*" means a report presenting the results of an *Acoustic Audit*, prepared in accordance with *Publication NPC-233*;
4. "*Acoustic Barrier*" means a barrier or berm positioned such that it completely interrupts the line of sight between the *Equipment* and the noise sensitive *Points of Reception* continuous without holes, gaps and other penetrations, and having surface mass of at least 20 kilograms per square metre;
5. "*Acoustical Consultant*" means a person currently active in the field of environmental acoustics and noise/vibration control, who is familiar with *Ministry* noise guidelines and procedures and has a combination of formal university education, training and experience necessary to assess noise emissions from a *Facility*;

6. "*Approval*" means this Environmental Compliance Approval, including the application and supporting documentation listed above;
7. "*Company*" means Sonoco Canada Corporation, that is responsible for the construction or operation of the *Facility* and includes any successors and assigns;
8. "*District Manager*" means the District Manager of the appropriate local district office of the *Ministry*, where the *Facility* is geographically located;
9. "*EPA*" means the Environmental Protection Act, R.S.O. 1990, c.E.19, as amended ;
10. "*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*;
11. "*Facility*" means the entire operation located on the property where the *Equipment* is located;
12. "*Independent Acoustical Consultant*" means an *Acoustical Consultant* who is not representing the *Company* and was not involved in preparing the *Acoustic Assessment Report* or the design/implementation of *Noise Control Measures* for the *Facility* and/or *Equipment*. The Independent Acoustical Consultant shall not be retained by the *Acoustical Consultant* involved in the noise impact assessment or the design/implementation of *Noise Control Measures* for the *Facility* and/or *Equipment*;
13. "*Manual*" means a document or a set of documents that provide written instructions to staff of the *Company*;
14. "*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;
15. "*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 *Publication NPC-300*. It also means the Noise Abatement Action Plan prepared by HGC Engineering Limited, dated 23 October 2018 and signed by Corey Kinart, P.Eng.;
16. "*Noise Control Measures*" means measures to reduce the noise emission from the *Facility* and/or *Equipment* including, but not limited to silencers, acoustic louvers, enclosures, absorptive treatment, plenums and barriers. It also means the noise control measures outlined in the *Noise Abatement Action Plan*;
17. "*Point of Reception*" means Point of Reception as defined by *Publication NPC-300*;
18. "*Publication NPC-103*" means the *Ministry* Publication NPC-103 of the Model

Municipal Noise Control By-Law, Final Report, August 1978, published by the *Ministry* as amended;

19. "*Publication NPC-207*" means the *Ministry* draft technical publication "Impulse Vibration in Residential Buildings", November 1983, supplementing the Model Municipal Noise Control By-Law, Final Report, published by the Ministry, August 1978, as amended;
20. "*Publication NPC-233*" means the *Ministry* Publication NPC-233, "Information to be Submitted for Approval of Stationary Sources of Sound", October, 1995 as amended;
21. "*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.

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

## TERMS AND CONDITIONS

### 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*.

### 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 by not later than April 18, 2027, the *Noise Control Measures* as outlined in the *Noise Abatement Action Plan* as specified in Schedule A of this *Approval*;
  - b. ensure, subsequent to the implementation of the proposed *Noise Control Measures* that the noise emissions from the *Facility* comply with the limits set in *Ministry Publication NPC-300*; and
  - c. ensure that the *Noise Control Measures* are properly maintained and continue to provide the acoustical performance outlined in the *Acoustic Assessment Report*.
2. The *Company* shall, at all times, ensure that the vibration emissions from the *Facility* comply with the limits set out in *Ministry Publication NPC-207*.

3. The *Company* shall carry out *Acoustic Audit* measurements on the actual noise emissions due to the operation of the *Facility*. The *Company*:

- a. shall carry out *Acoustic Audit* measurements in accordance with the procedures in *Publication NPC-103*;
- b. shall submit an *Acoustic Audit Report* on the results of the *Acoustic Audit*, prepared by an *Independent Acoustical Consultant*, in accordance with the requirements of *Publication NPC-233*, to the *District Manager* and the *Director* not later than six (6) months after the full implementation of the *Noise Control Measures*.

4. The *Director*:

- a. may not accept the results of the *Acoustic Audit* if the requirements of *Publication NPC-233* were not followed;
- b. may require the *Company* to repeat the *Acoustic Audit* if the results of the *Acoustic Audit* are found unacceptable to the *Director*.

## **SCHEDULE A**

### **Noise Abatement Action Plan**

#### **Stage 1, Completion not later than the date of this *Approval* :**

1. Unloading of trailers using forklifts (which results in impulsive sound emissions, represented by IS-01) will be restricted to daytime and evening hours only (07:00 to 23:00);
2. The man door on the north end of the mill building (NS-38) will be kept closed at all times and the overhead doors on the west side of the mill building (NS-10 and NS-11) will be kept closed during night-time hours (23:00 to 07:00);
3. A stationary, plant-based blower will be installed and used to unload starch tanker trucks (source NS-28A). It will be equipped with appropriate engineered noise control measures to yield a maximum sound pressure level of 57 dBA measured at five metres from the blower. Use of the louder, truck mounted blowers will thereafter be prohibited;
4. Source 5 (which is collocated with source IS-02) will be equipped with a discharge silencer with the following minimum insertion losses in 1/1 octave frequency bands listed in Table 1;

**Stage 2, Completion not later than 18 April 2021 :**

1. Source 11 and 15a through 15e will be equipped with a discharge silencer with the minimum insertion losses in 1/1 octave frequency bands listed in Table 2;

**Stage 3, Completion not later than 18 April 2023 :**

1. Source NS-35 will be equipped with a silencer, and sources NS-36 and NS-37 will be fitted with acoustic enclosures, with the following minimum insertion losses in 1/1 octave frequency bands listed in Table 3;
2. One (1) 5.2 metre high *acoustic barrier* with a length of 3 metres on the west extent of the Economizer fan casing/motor (NS-33), and a length of 3.5 metres on the north extent as shown in the *Acoustic Assessment Report* as Barrier "A" on Figure 4, shall be continuous without holes, gaps and other penetrations, and having a surface mass density of at least 20 kilograms per square metre;

**Stage 4, Completion not later than 18 April 2025 :**

1. One (1) 4.5 metre high *acoustic barrier* with a length of 11 metres on the north extent of the *facility* as shown in the *Acoustic Assessment Report* as Barrier "1" on Figure 4, shall be continuous without holes, gaps and other penetrations, and having a surface mass density of at least 20 kilograms per square metre;
2. One (1) 4.5 metre high *acoustic barrier* with a length of 63 metres on the west extent of the facility as shown in the *Acoustic Assessment Report* as Barrier "2" on Figure 4, shall be continuous without holes, gaps and other penetrations, and having a surface mass density of at least 20 kilograms per square metre;
3. One (1) 6.5 metre high *acoustic barrier* with a length of 22 metres on the west extent of the facility as shown in the *Acoustic Assessment Report* as Barrier "3" on Figure 4, shall be continuous without holes, gaps and other penetrations, and having a surface mass density of at least 20 kilograms per square metre;

**Stage 5, Completion not later than 18 April 2027 :**

1. One (1) 6.5 metre high *acoustic barrier* with a length of 24 metres on the west extent of the facility as shown in the *Acoustic Assessment Report* as Barrier "4" on Figure 4, shall be continuous without holes, gaps and other penetrations, and having a surface mass density of at least 20 kilograms per square metre;
2. One (1) 5.25 metre high *acoustic barrier* with a length of 36 metres on the west extent of the facility as shown in the *Acoustic Assessment Report* as Barrier "5" on Figure 4, shall be continuous without holes, gaps and other penetrations, and having a surface mass density of at least 20 kilograms per square metre;

3. One (1) 4.0 metre high *acoustic barrier* with a length of 35 metres on the west extent of the facility as shown in the *Acoustic Assessment Report* as Barrier "6" on Figure 4, shall be continuous without holes, gaps and other penetrations, and having a surface mass density of at least 20 kilograms per square metre;
4. One (1) 4.0 metre high *acoustic barrier* with a length of 20 metres on the west extent of the facility as shown in the *Acoustic Assessment Report* as Barrier "7" on Figure 4, shall be continuous without holes, gaps and other penetrations, and having a surface mass density of at least 20 kilograms per square metre;
5. One (1) 4.0 metre high *acoustic barrier* with a length of 22 metres on the west extent of the facility as shown in the *Acoustic Assessment Report* as Barrier "8" on Figure 4, shall be continuous without holes, gaps and other penetrations, and having a surface mass density of at least 20 kilograms per square metre;

**Table 1: Discharge Silencer Insertion Loss dB**

Source ID	Source Name	31 Hz	63 Hz	125 Hz	250 Hz	500 Hz	1000 Hz	2000 Hz	4000 Hz	8000 Hz
5/IS-02	Silo Bin Vent Exhaust	NA	NA	NA	12	23	24	21	14	6

**Table 2: Discharge Silencer Insertion Loss dB**

Source ID	Source Name	31 Hz	63 Hz	125 Hz	250 Hz	500 Hz	1000 Hz	2000 Hz	4000 Hz	8000 Hz
11	VAT Exhaust	NA	3	11	19	22	24	19	10	NA
15a	Area Exhaust	NA	3	6	16	20	23	17	10	NA
15b	Dry End Exhaust #1	NA	4	10	19	21	23	17	NA	NA
15c	Area Exhaust	NA	NA	13	22	22	26	20	10	NA
15d	Area Exhaust	NA	NA	15	22	22	26	20	10	NA
15e	Area Exhaust	NA	4	15	22	23	24	19	10	NA

**Table 3: Acoustic Enclosure and Silencer Insertion Loss dB**

Source ID	Source Name	31 Hz	63 Hz	125 Hz	250 Hz	500 Hz	1000 Hz	2000 Hz	4000 Hz	8000 Hz
NS-35	Economizer stack Outlet Silencer	NA	3	14	16	18	13	9	NA	NA
NS 36 and 37	Trim Recovery Duct Enclosure	NA	NA	5	15	15	14	21	10	NA

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

1. Condition number 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 number 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 number 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 number 4 is included to provide the minimum performance requirements considered necessary to prevent an adverse effect resulting from the operation of the *Facility*.

**Upon issuance of the environmental compliance approval, I hereby revoke Approval No(s). 5912-9KTPKR issued on April 18, 2017**

*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, the Minister of the Environment, Conservation and Parks, within 15 days after receipt of this Notice, require a hearing by the Tribunal. The Minister of the Environment, Conservation and Parks 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.

*Pursuant to subsection 139(3) of the Environmental Protection Act, a hearing may not be required with respect to any terms and conditions in this environmental compliance approval, if the terms and conditions are substantially the same as those contained in an approval that is amended or revoked by this environmental compliance approval.*

*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 Minister of the Environment,  
Conservation and Parks  
777 Bay Street, 5th Floor  
Toronto, Ontario  
M7A 2J3

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

Jeffrey McKerrall, P.Eng.  
Director  
appointed for the purposes of Part  
II.1 of the *Environmental Protection  
Act*

BA/  
c: District Manager, MECP Guelph  
Stuart Bailey, OSB Consulting