

AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 0486-BCKRFH

Issue Date: July 4, 2019

Ralston Metal Products Limited
50 Watson Road South
Guelph, Ontario
N1H 6H8

Site Location: 50 Watson Road South
Guelph City, County of Wellington

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:

Heat Cleaning Furnace:

- one (1) heat cleaning furnace (Pollution Control Products Co. Model PTR-112T), used to remove surface coatings from production components, equipped with one (1) thermocouple in the primary chamber, one (1) thermocouple complete with a continuous temperature recorder in the secondary chamber, one (1) natural gas-fired burner in the primary chamber having a maximum heat input of 158,258 kilojoules per hour and one (1) natural gas-fired burner in the secondary chamber having a maximum heat input of 158,258 kilojoules per hour, discharging to the air at a volumetric flow rate of 0.2 actual cubic metre per second through a stack identified as HCF-1, having an exit diameter of 0.33 metre, extending 1.8 metres above the roof and 8.5 metres above grade;

Metal Working Operations:

- one (1) laser cutting downdraft table, equipped with non-woven fibre filters embedded with activated carbon particles, having a total media area of 24.0 square metres, operating at a maximum of 0.5 hour per day, discharging to the air at a volumetric flow rate of 2.55 actual cubic metres per second through a stack identified as LCM-1, having an exit diameter of 0.31 metre, extending 1.0 metre above the roof and 7.5 metres above grade;

- one (1) laser cutting downdraft table, equipped with non-woven fibre filters embedded with activated carbon particles, having a total media area of 19.8 square metres, operating at a maximum of 8 hours per day, discharging to the air at a volumetric flow rate of 2.12 actual cubic metres per second through a stack identified as LCM-3, having an exit diameter of 0.34 metre, extending 1.0 metre above the roof and 7.5 metres above grade;
- two (2) chillers used to remove heat from the laser cutting process;
- seven (7) welding stations (four duty and three standby), discharging inside the plant area;
- one (1) plasma cutting station, with operational restriction to carbon steel cutting only, discharging inside the plant area;
- ten (10) spot welding stations, discharging inside the plant area;
- three (3) grinding cells, discharging inside the plant area;
- one (1) dust collector serving the sand-blasting operations, discharging inside the plant area;

Continuous Powder Coating Line:

- one (1) three-stage parts wash system serving the continuous line for metal surface preparation, discharging to the air through the entrance and exit stages of the wash system via separate stacks identified as source CPM-1 and CPM-2, respectively, each having a volumetric flow rate of 1.98 actual cubic metres per second, each having an exit diameter of 0.46 metre, each extending 3.4 metres above the roof and 10.1 metres above grade, equipped with a natural gas-fired burner having a maximum heat input of 5,275,280 kilojoules per hour, discharging to the air through a stack identified as CPM-3, having an exit diameter of 0.33 metre, extending 3.4 metres above the roof and 10.1 metres above grade;
- one (1) dry off oven serving the continuous line for removing excess moisture from the parts prior to the powder coat application, equipped with one (1) natural gas fired burner having a maximum heat input of 4,220,224 kilojoules per hour, discharging to the air at a volumetric flow rate of 2.36 actual cubic metres per second through a stack identified as CDO-2, having an exit diameter of 0.33 metre, extending 3.4 metres above the roof and 10.1 metres above grade;
- two (2) powder coating booths serving the continuous line for the application of powder based coatings, each having a maximum powder-based coating usage rate of 15.1 kilograms per hour, each equipped with a powder recovery system and two-stage dust filtration system to return air drawn through the booth openings back into the plant area;

- one (1) curing oven serving the continuous line for powder paint curing, equipped with a natural gas fired burner having a maximum heat input of 4,220,224 kilojoules per hour, discharging to the air at a volumetric flow rate of 2.35 actual cubic metres per second through a stack identified as CBO-2, having an exit diameter of 0.51 metre, extending 3.4 metres above the roof and 10.1 metres above grade;

Batch Powder Coating Line:

- one (1) two-stage parts wash system serving the batch line for metal surface preparation, discharging to the air at a volumetric flow rate of 1.89 actual cubic metres per second through a stack identified as source BPM-1, having an exit diameter of 0.30 metre, extending 1.8 metres above the roof and 8.5 metres above grade, equipped with a natural gas-fired burner having a maximum heat input of 1,582,584 kilojoules per hour, discharging to the air through a stack identified as BPM-2, having an exit diameter of 0.30 metre, extending 1.8 metres above the roof and 8.5 metres above grade;
- one (1) dry off oven serving the batch line for removing excess moisture from the parts prior to the powder coat application, equipped with one (1) natural gas fired burner having a maximum heat input of 2,637,640 kilojoules per hour, discharging to the air at a volumetric flow rate of 0.47 actual cubic metre per second through a stack identified as BDO-1, having an exit diameter of 0.25 metre, extending 3.7 metres above the roof and 10.4 metres above grade;
- one (1) powder coating booth serving the batch line used for the application of powder based coatings at a maximum rate of 15.1 kilograms per hour, equipped with a powder recovery system and two-stage dust filtration system to return air drawn through the booth openings back into the plant area;
- one (1) curing oven serving the batch line for powder paint curing, equipped with a natural gas fired burner having a maximum heat input of 844,045 kilojoules per hour, discharging to the air at a volumetric flow rate of 0.36 actual cubic metre per second through a stack identified as BBO-1, having an exit diameter of 0.26 metre, extending 2.6 metres above the roof and 9.3 metres above grade;

all in accordance with the Application for Environmental Compliance Approval submitted by Ralston Metal Products Limited, dated May 15, 2018 and signed by Paul Berry, Plant Manager, and all supporting information prepared by WSP Canada Inc., including the additional information provided by Kelly Graver, P.Eng. and David Hofbauer, P.Eng. (WSP Canada Inc.), dated March 21, 2019, April 11, 2019, June 14, 2019 and June 26, 2019; all in accordance with the Application for a Certificate of Approval (Air) submitted by Warner Custom Coating Inc., dated January 26, 2006 and signed by Mr. Derek Holt, Quality Assurance Manager; and all supporting information prepared by AMEC Geomatrix Limited, including the additional information provided by Mr. Jim Anderson, Senior Engineer, dated June 25, 2008, July 21, 2008 and August 6, 2008.

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

1. "Approval" means this Environmental Compliance Approval, including the application and supporting documentation listed above;

2. "*Company*" means Ralston Metal Products Limited, that is responsible for the construction or operation of the *Facility* and includes any successors and assigns;
3. "*District Manager*" means the District Manager of the appropriate local district office of the *Ministry*, where the *Facility* is geographically located;
4. "*EPA*" means the Environmental Protection Act, R.S.O. 1990, c.E.19, as amended;
5. "*Emissions Reduction Plan*" means the plan specifying the activities to be undertaken by the *Company* to reduce emissions from the two (2) laser cutting machines and modify the associated stack configuration (from sidewall venting to vertical exhaust configuration) described in the *Company's* application, and in the supporting documentation referred to herein, including the *ESDM Report*, to the extent approved by this *Approval*.
6. "*Equipment*" means the *Heat Cleaning Furnace*, non-woven fibre filters serving the laser cutting downdraft tables and powder coating booths described in the *Company*'s application, this *Approval* and in the supporting documentation submitted with the application, to the extent approved by this *Approval*;
7. "*Facility*" means the entire operation located on the property where the *Equipment* is located;
8. "*Heat Cleaning Furnace*" means the heat cleaning furnace and associated thermocouples and continuous temperature recorder described in the *Company*'s application, this *Approval* and in the supporting documentation submitted with the application, to the extent approved by this *Approval*;
9. "*Manual*" means a document or a set of documents that provide written instructions to staff of the *Company*;
10. "*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; and
11. "*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;
 - 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. The *Company* shall operate the *Heat Cleaning Furnace* in such a manner that:
- a. The burner flame in the secondary chamber is established before the primary chamber is fired;
 - b. The temperature in the secondary chamber, as measured by the thermocouple, is maintained at a minimum of 760 degrees Celsius at all times when the primary chamber is loaded and heat cleaning is in progress;
 - c. The burner in the primary chamber is automatically turned off, if the secondary burner fails; and
 - d. No substances containing chlorinated and/or fluorinated compounds, including polyvinyl chloride and Teflon, are loaded into the *Heat Cleaning Furnace*.
3. The *Company* shall restrict the operation of the laser cutting downdraft tables (associated with stack LCM-1 and LCM-3), such that laser cutting of stainless steel materials are undertaken at no more than 5% of the total annual processing rate of the laser cutting downdraft tables.

2. MONITORING

1. The *Company* shall continuously monitor and record the temperature in the secondary chamber of the *Heat Cleaning Furnace*, when the *Heat Cleaning Furnace* is in operation. The continuous temperature monitoring and recording system shall comply with the requirements

outlined in Schedule "A".

3. 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*;
 - b. daily records of the actual operating temperature in the secondary chamber of the *Heat Cleaning Furnace*;
 - c. daily records of materials loaded into the *Heat Cleaning Furnace*;
 - d. daily records of the processing rates (line speed, metal thickness and width) and materials processed through the laser cutting downdraft tables; and
 - e. 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.

4. 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.

5. EMISSIONS REDUCTION PLAN

1. The *Company* shall implement the *Emissions Reduction Plan*, not later than August 31, 2019 or within a period as directed or agreed to in writing by the *District Manager*.

6. NOISE

1. The *Company* shall, at all times, ensure that the noise emissions from the *Facility* comply with

the limits set out in *Ministry Publication NPC-300*.

SCHEDULE "A"

Continuous Temperature Monitoring System

PARAMETER:

Temperature

LOCATION:

The sample point for the continuous temperature monitoring and recording system shall be located at a location where the measurements are representative of the minimum temperature of the gases leaving the secondary chamber of the *Heat Cleaning Furnace* .

PERFORMANCE:

The continuous temperature monitoring and recording system shall meet the following minimum performance specifications for the following parameters.

PARAMETERS	SPECIFICATION
Type	shielded "K" type thermocouple, or equivalent
Accuracy	± 1.5 percent of the minimum gas temperature

DATA RECORDER:

The data recorder must be capable of registering continuously the measurement of the monitor without a significant loss of accuracy and with a time resolution of 1 minute or better.

RELIABILITY:

The continuous temperature monitoring system shall be operated and maintained so that accurate data is obtained during a minimum of 90 percent of the time, on a monthly basis, when the *Heat Cleaning Furnace* is in operation.

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 gather accurate information on a continuous basis 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 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.
4. Condition No. 4 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.
5. Condition No. 5 is included to require the *Company* to implement *Emissions Reduction Plan* designed to reduce emissions from the *Facility*.
6. Condition No. 6 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). 3711-7HBKM4 issued on August 25, 2008.

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**

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, 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 4th day of July, 2019



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

RA/

c: District Manager, MECP Guelph
David Hofbauer, WSP Canada Inc.