

AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 3004-BFQPN9
Issue Date: October 17, 2019

London Mechanical Services Limited
80 Midpark Rd
London, Ontario
N6N 1B3

Site Location: 80 Midpark Road
London City, County of Middlesex
N6N 1B3

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) natural gas-fired, Guspro Model BB-84102108-SP, or equivalent, heat cleaning oven, to remove plastisol coating off the plating racks and paint racks, equipped with:
 - one (1) primary burner having a maximum heat input of 422,000 kilojoules per hour, and
 - one (1) secondary burner having a maximum heat input of 1,688,000 kilojoules per hour,
 - exhausting via one (1) IPF Vertical Countercurrent Flow Scrubber, Model IPFVS-1500, or equivalent, with a diameter of 0.56 metre, a packing height of 1.52 metres consisting of Kynar, or equivalent packing material, a maximum scrubbing water flow rate of 0.78 litre per second and a maximum inlet gas flow rate of 0.71 actual cubic metre per second, into the air through an exhaust stack, designated as STCK2, having a diameter of 0.25 metre, and extending 15.5 metres above grade;
- one (1) exhaust system serving the metal rack priming and plastisol coating process, applying reducer and primer at a combined maximum usage rate of 0.25 litres per ten (10) minutes up to a maximum of 1 litre per day, discharging into the air through a stack, designated as STCK6, having an exit diameter of 0.46 metre, extending 2.44 metres above the roof and 7.62 metres above grade;

- one (1) natural gas-fired curing oven, having a maximum heat input of 527,500 kilojoules per hour, discharging into the air through a stack, designated as STCK3, having an exit diameter of 0.25 metre, extending 2.44 metres above the roof and 7.62 metres above grade;
- one (1) baghouse dust collector, to control emissions from sandblasting operation, complete with Terylene filter material having a filtering area of 97.73 square metres and an intermittent shaker cleaning system, discharging into the air at a maximum volumetric flow rate of 1.51 actual cubic metres per second at ambient temperature, through a sidewall vent, designated as SNDBLST, having an exit diameter of 0.57 metre, extending 4.8 metres above grade;
- fugitive emissions generated from the welding operations, having maximum welding usage rates of 0.056 kilograms per day of carbon steel wire, 0.028 kilograms per day of stainless steel wire, 0.226 kilograms per day of copper-mate self-cleaning soldering paste, 0.077 kilograms per day of 45% silver, cadmium-containing brazing alloy, and 0.453 kilograms per day of Canfield 95% tin / 5% antimony lead-free solder;

all in accordance with the Application for Approval (Air & Noise) submitted by London Mechanical Services Limited, dated January 21, 2019, and signed by John Vinen, President; and the supporting information, including the Emission Summary and Dispersion Modelling Report, submitted by O2E Inc., dated January 11, 2019, and signed by Tim Logan, and the Secondary Noise Screening Method prepared by O2E Inc., dated January 7, 2018 and signed by Tim Logan.

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 London Mechanical Services 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. "*Equipment*" means the heat cleaning oven, IPF Vertical Countercurrent Flow Scrubber, Model IPFVS-1500, or equivalent, and baghouse dust collector described in the *Company*'s application, this *Approval* and in the supporting documentation submitted with the application, to the extent approved by this *Approval*;
6. "*Facility*" means the entire operation located on the property where the *Equipment* is located;
7. "*Manual*" means a document or a set of documents that provide written instructions to staff of the *Company*;

8. "*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;
9. "*Oven*" means the natural gas-fired, Guspro Model BB-84102108-SP, or equivalent, heat cleaning oven as well as the 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*;
10. "*Odour Best Management Practices Plan*" means the document titled "Odour Best Management Practices Plan", dated January 11, 2019 and prepared by O2E Inc.;
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 operate the *Oven* 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 temperature of 780 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, other than Plastisol, are loaded into the *Oven*.
2. The *Company* shall ensure that the *Equipment* and *Oven* are 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* and *Oven* suppliers;

- ii. emergency procedures;
 - iii. procedures for any record keeping activities relating to operation and maintenance of the *Equipment* and *Oven*;
 - 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. FUGITIVE ODOUR CONTROL

1. The *Company* shall implement the *Odour Best Management Practices Plan* for the control of fugitive odour emissions resulting from the operation of the *Facility*. The *Company* shall update the *Odour Best Management Practices Plan* as necessary or at the direction of the *District Manager*.

3. MONITORING

1. The *Company* shall continuously monitor and record the temperature in the secondary chamber of the *Oven*, when the *Oven* is in operation. The continuous temperature monitoring and recording system shall comply with the requirements outlined in the attached Schedule "A".

4. 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 *Oven*;
 - b. daily records of the actual operating temperature in the secondary chamber of the *Oven*;
 - c. daily records of materials loaded into the *Oven*; and,
 - d. 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.

5. 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.

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"

Schedule "A" forms part of this Approval.

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 Oven.

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

<u>Parameter</u>	<u>Specification</u>
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 monitor shall be operated and maintained so that accurate data is obtained during a minimum of 95 percent of the time for each calendar quarter.

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

1. Condition Nos. 1 and 2 are 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. 3 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. 4 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. 5 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. 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).
8272-9QHMBU issued on December 10, 2014**

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 <http://ero.ontario.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 17th day of October, 2019



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

AB/

c: District Manager, MECP London - District
Tim Logan, O2E Inc.