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Ministry of the Environment, Conservation and Parks
Ministère de l'Environnement, de la Protection de la nature et des Parcs

AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 1199-BD4PWV
Issue Date: January 24, 2020

Brawo Brassworking Limited
Operating as Lofthouse Manufacturing
500 Ontario Street
Burk's Falls, Ontario
POA 1C0

Site Location: 500 Ontario Street, Burk's Falls Village, District Of Parry Sound, Ontario.

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) exhaust system, equipped with an electrostatic precipitator smoke collector, used to control emissions from the forging operations in the Production Area, discharging into the air at a volumetric flow rate of 12.5 cubic metres per second, via a stack having an exit diameter of 1.0 metre, extending 2.4 metres above the roof and 10.6 metres above grade;
- one (1) exhaust system, equipped with a smog hog electrostatic precipitator, used to control emissions from the forging operations in the Addition area, discharging into the air at a volumetric flow rate of 1.98 cubic metres per second, via a stack having an exit diameter of 0.25 metre, extending 9.0 metres above grade;
- four (4) natural gas fired forging ovens, having a total heat input of 2,215,500 kilojoules per hour and eight (8) electric forging ovens;
- one (1) exhaust system serving the vibration polishing operation, discharging into the air at a volumetric flow rate of 11.8 cubic metres per second, via a stack having an exit diameter of 1.22 metres, extending 1.6 metres above the roof and 9.2 metres above grade;
- one (1) exhaust system serving the Tool Room - Grinding operations, equipped with a Dust Hog air cleaner, discharging into the air a volumetric flow rate of 0.33 cubic metre per second, at 3.0 metres above grade;
- one (1) exhaust system serving the Tool Room - Grinding operations, equipped with a Q-Air air cleaner, discharging into the air a volumetric flow rate of 0.94 cubic metre per second, at 3.0 metres above grade;
- one (1) exhaust system serving the Electrical Discharge Machining machine, equipped with an Electro Air air cleaner, discharging into the air a volumetric flow rate of 0.99 cubic metre per second, at 3.0 metres above grade;

- one (1) natural gas fired non-emergency generator, having an electrical power output rating of 1500 kilowatts, equipped with a selective catalytic reduction unit, discharging into the air a volumetric flow rate of 5.81 actual cubic metre per second, via a stack having an exit diameter of 0.46 metre, terminating at 7.6 metres above grade;

All in accordance with the application for an Approval (Air and Noise) and all supporting information, dated February 26, 2019 and signed by Dave Wilde of Brawo Brassworking Limited, Operating as Lofthouse Manufacturing, and the Acoustic Assessment Report dated February 26, 2019, prepared by Ron Taylor of EXP Services Inc.

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 Brawo Brassworking Limited, Operating as Lofthouse Manufacturing, that is responsible for the construction or operation of the *Facility* and includes any successors and assigns;
3. "*Director*" means a person appointed for the purpose of section 20.3 of the *EPA* by the *Minister* pursuant to section 5 of the *EPA*;
4. "*District Manager*" means the District Manager of the appropriate local district office of the *Ministry*, where the *Facility* is geographically located;
5. "*EPA*" means the Environmental Protection Act, R.S.O. 1990, c.E.19, as amended ;
6. "*Equipment*" means the equipment 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. "*Manager*" means the Manager, Technology Standards Section, Technical Assessment and Standards Development Branch, or any other person who represents and carries out the duties of the Manager, Technology Standards Section, Technical Assessment and Standards Development Branch, as those duties relate to the conditions of 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;
11. "*Power Generator*" means the non-emergency natural gas fired generator, having a power output rating of 1500 kilowatts, equipped with a selective catalytic reduction unit, described in the *Company's* application, this *Approval* and in the supporting documentation referred to herein, to the extent approved by this *Approval*;
12. "*Pre-Test Plan*" means a plan for the *Source Testing* including the information required in Section 1.1 of the *Source Testing Code*;
13. "*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.
14. "*Source Testing*" means sampling and testing to measure emissions resulting from operating the *Power Generator* under conditions which yield the worst case emissions, as practically possible, within the approved operating range of the *Power Generator* and satisfies paragraph 1 of subsection 11(1) of O. Reg. 419, as determined in consultation with the *Manager*;
15. "*Source Testing Code*" means the *Source Testing Code*, dated June 2010, prepared by the *Ministry*, 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*; and
 - iv. all appropriate measures to minimize noise, dust and odorous emissions from all potential sources;
- b. implement the recommendations of the *Manual*; and
- c. retain, for a minimum of two (2) years from the date of their creation, all records on the maintenance, repair and inspection of the *Equipment*, and make these records available for review by staff of the *Ministry* upon request.

2. PERFORMANCE REQUIREMENTS

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*.
2. The *Company* shall ensure that the *Power Generator* is designed and operated to comply, at all times during normal operating conditions, except during start-up and shutdown, with the following performance requirements: The emission of nitrogen oxides in the gases emitted from the exhaust stack of the *Power Generator* are not greater than 0.4 kilograms per Megawatt-hour.

3. SOURCE TESTING

1. The *Company* shall perform *Source Testing* in accordance with the procedures outlined in the attached Schedule A, to determine the rate of emission of the Nitrogen Oxides from the *Power Generator* exhaust.

SCHEDULE A

Source Testing Procedures

1. The *Company* shall submit, at least sixty (60) days prior to the scheduled date of the *Source Testing* to the *Manager* a *Pre-Test Plan* for the *Source Testing* required under this *Approval*. The *Company* shall finalize the *Pre-Test Plan* in consultation with the *Manager*.
2. The *Company* shall not commence the *Source Testing* required under this *Approval* until the *Manager* has approved the *Pre-Test Plan*.
3. The *Company* shall complete the *Source Testing* not later than three months (3) after the commencement of operation of the *Power Generator*, as applicable, or three (3) months after the *Manager* has approved the *Pre-Test Plan*, whichever occurs later.

4. The *Company* shall notify the *Manager*, the *District Manager* and the *Director* in writing of the location, date and time of any impending *Source Testing* required by this *Approval*, at least fifteen (15) days prior to the *Source Testing*.
5. The *Company* shall submit a report (hard copy and electronic format) on the *Source Testing* to the *Manager*, the *District Manager* and the *Director* not later than three (3) months after completing the *Source Testing*. The report shall be in the format described in the *Source Testing Code*, and shall also include, but not be limited to:
 - a. an executive summary;
 - b. an identification of the applicable North American Industry Classification System code (NAICS) for the *Facility*;
 - c. Date, time and duration of each test;
 - d. Records of operating conditions at the time of *Source Testing*;
 - e. Oxygen concentration (percent by volume);
 - f. Stack gas volumetric flow rate (cubic metres per second at reference conditions);
 - g. Stack gas temperature (degrees Celsius);
 - h. Average of emission concentration readings of the Test Contaminants (part per million by volume);
 - i. results of *Source Testing*, including the emission rate, emission concentration, and relevant emission factor of the Test Contaminants from the *Power Generator*, as applicable; and
 - j. a tabular comparison of *Source Testing* results for the *Power Generator*, as applicable and Test Contaminants to original emission estimates described in the *Company's* application and the *ESDM Report*.
6. The *Director* may not accept the results of the *Source Testing* if:
 - a. the *Source Testing Code* or the requirements of the *Manager* were not followed;
 - b. the *Company* did not notify the *Manager*, the *District Manager* and *Director* of the *Source Testing*; or
 - c. the *Company* failed to provide a complete report on the *Source Testing*.

7. If the *Director* does not accept the results of the *Source Testing*, the *Director* may require re-testing. If re-testing is required, the *Pre-Test Plan* strategies need to be revised and submitted to the *Manager* for approval. The actions taken to minimize the possibility of the *Source Testing* results not being accepted by the *Director* must be noted in the revision.
8. If the *Source Testing* results are higher than the emission estimates in the *Company's ESDM Report*, the *Company* shall update their *ESDM Report* in accordance with Section 26 of *O. Reg. 419/05* with the results from the *Source Testing* report and make these records available for review by staff of the *Ministry* upon request. The updated Emission Summary Table from the updated *ESDM Report* shall be submitted with the report on the *Source Testing*.

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*.
In addition, the *Company* is required 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.
2. Condition No. 2 is included to provide the minimum performance requirements considered necessary to prevent an adverse effect resulting from the operation of the *Facility* and to require the *Company* to gather accurate information so that the environmental impact and subsequent compliance with the *EPA*, the *regulations* and this *Approval* can be verified.
3. Condition No. 3 is included to require the *Company* to gather accurate information so that the environmental impact and subsequent compliance with the *EPA*, the *regulations* and this *Approval* can be verified.

Upon issuance of the environmental compliance approval, I hereby revoke Approval No(s). 7320-AQ9Q8Q issued on April 23, 2018.

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
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*** 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 24th day of
January, 2020

Jeffrey McKerrall, P.Eng.

Director
appointed for the purposes of Part
II.1 of the *Environmental Protection
Act*

QN/

c: Area Manager, MECP North Bay

c: District Manager, MECP Sudbury

Ron Taylor, EXP Services