

AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER A650041

Issue Date: January 17, 2020

Canadian Liquids Processors Limited
15 Biggar Ave
Hamilton, Ontario
L8L 3Z3

Site Location: 15 Biggar Avenue
Hamilton City,
L8L 3Z3

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 Waste Disposal Site (Processing) serving Canada and the United States for the receipt, processing, temporary storage, and transfer of the following categories of waste:

- a) municipal waste that consist solely of waste from one or more of the categories set out in Schedule 1 and 2 of Ontario Regulation 101/94 excluding leather, leaf and yard waste, textiles and household appliances; and
- b) liquid food processing waste limited to off-specification and out-of-date alcoholic and non-alcoholic beverages contained in glass, plastic or metal containers.

Note: Use of this site for additional categories of wastes requires a new application and amendments to this ECA.

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

- (1) "**Company**" means any person that is responsible for the establishment or operation of the Site being approved by this ECA, and includes **Canadian Liquid Processors Limited**, its successors and assigns;
- (2) "**Design and Operations Report**" means the Design and Operations Report, included as part of Item 27 of Schedule "A" of this ECA or the most recent Design and Operations Report that the Company has submitted to the Ministry in accordance with condition 3 of this ECA;

- (3) "**Director**" means any Ministry employee appointed in writing by the Minister pursuant to section 5 of the EPA as a Director for the purposes of Part V of the EPA;
- (4) "**District Manager**" means the District Manager of the local district office of the Ministry in which the Site is geographically located;
- (5) "**ECA**" means this entire Environmental Compliance Approval document, issued in accordance with the EPA, and includes any schedules to it, the application and the supporting documentation listed in Schedule "A";
- (6) "**EPA**" means the Environmental Protection Act, R.S.O. 1990, C.E-19, as amended;
- (7) "**Ministry**" means the Ontario Ministry of the Environment, Conservation and Parks;
- (8) "**OWRA**" means the Ontario Water Resources Act, R.S.O. 1990, c. O.40, as amended;
- (9) "**PA**" means the Pesticides Act, R.S.O. 1990, c. P-11, as amended from time to time;
- (10) "**Provincial Officer**" means any person designated in writing by the Minister as a provincial officer pursuant to section 5 of the OWRA or section 5 of the EPA or section 17 of PA;
- (11) "**Putrescible Waste**" means organic waste that rapidly decomposes, such as food waste or source separated organics;
- (12) "**Reg. 347**" means Regulation 347, R.R.O. 1990, General - Waste Management, made under the EPA, as amended from time to time;
- (13) "**Site**" means the entire property located in Parts 1 and 4 of Reference Plan 6ZR2914, Part of Lot 8, 15 Biggar Avenue, Hamilton, Ontario;
- (14) "**Trained personnel**" means competent personnel that have been trained through instruction and/or practice in accordance with condition 14 of this ECA including but not limited to the following areas:
 - (1) relevant waste management legislation, regulations and guidelines;
 - (2) major environmental concerns pertaining to the waste to be handled;
 - (3) emergency response procedures for the processes and wastes to be handled;
 - (4) use and operation of the equipment to be used;
 - (5) emergency response procedures and alerting;
 - (6) Company specific written procedures for the control of nuisance Conditions; and
 - (7) requirements of this ECA;

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. GENERAL

Compliance

1. The Company and Operator shall ensure compliance with all the conditions of this ECA and shall ensure that any person authorized to carry out work on or operate any aspect of the Site is notified of this ECA and the conditions herein and shall take all reasonable measures to ensure any such person complies with the same.
2. Any person authorized to carry out work on or operate any aspect of the Site shall comply with the conditions of this ECA.
3. The Site shall be operated and maintained at all times including management and disposal of all waste in accordance with the EPA, Reg. 347 and the conditions of this ECA. At no time shall the discharge of a contaminant that causes or is likely to cause an adverse effect be permitted.

Design, Develop, Build, Operate, Modify and Maintain in Accordance

4. Except as otherwise provided for in this ECA, the Site and Works shall be designed, developed, built, operated, modified and maintained in accordance with the application for this ECA, dated August 17, 2016, the Design and Operations Report, as updated from time to time, and any other supporting documentation listed in Schedule "A".

Interpretation

5. Where there is a conflict between a provision of any document, including the application, referred to in this ECA, and the conditions of this ECA, the conditions in this ECA shall take precedence.
6. Where there is a conflict between the application and a provision in any documents listed in Schedule "A", the application shall take precedence, unless it is clear that the purpose of the document was to amend the application and that the Ministry approved the amendment.
7. Where there is a conflict between any two documents listed in Schedule "A", other than the application, the document bearing the most recent date shall take precedence.
8. The requirements of this ECA are severable. If any requirement of this ECA, or the application of any requirement of this ECA to any circumstance, is held invalid or unenforceable, the application of such requirement to other circumstances and the remainder of this ECA shall not be affected thereby.

Other Legal Obligations

9. The issuance of, and compliance with, this ECA does not:
 - (1) relieve any person of any obligation to comply with any provision of any applicable statute, regulation or other legal requirement including, but not limited to:
 - (a) obtaining site plan approval from the local municipal authority;
 - (b) obtaining all necessary building permits from the local municipal authority Building Services Division;
 - (c) obtaining approval from the Chief Fire Prevention Officer, local municipal authority: or
 - (2) limit in any way the authority of the Ministry to require certain steps be taken or to require the Company and Operator to furnish any further information related to compliance with this ECA.

Adverse Effect

10. The Company and operator shall take steps to minimize and ameliorate any adverse effect on the natural environment or impairment of water quality resulting from the Site, including such accelerated or additional monitoring as may be necessary to determine the nature and extent of the effect or impairment.
11. Despite a Company, operator or any other person fulfilling any obligations imposed by this ECA the Company, Operator or any other person remains responsible for any contravention of any other condition of this ECA or any applicable statute, regulation, or other legal requirement resulting from any act or omission that caused the adverse effect to the natural environment or impairment of water quality.

Change of Owner

12. The Company shall notify the Director in writing, and forward a copy of the notification to the District Manager, within thirty (30) days of the occurrence of any changes:
 - (1) the ownership of the Site;
 - (2) the operator of the Site;
 - (3) the address of the Company or operator;
 - (4) the partners, where the Company is or at any time becomes a partnership and a copy of the most recent declaration filed under the Business Names Act, R.S.O. 1990, c. B-17 shall be included in the notification; and

- (5) the name of the corporation where the Company is or at any time becomes a corporation, other than a municipal corporation, and a copy of the most current information filed under the Corporations Information Act, R.S.O. 1990, c. C-39 shall be included in the notification.
13. No portion of this Site shall be transferred or encumbered prior to or after closing of the Site unless the Director is notified in advance and sufficient financial assurance is deposited with the Ministry to ensure that these conditions will be carried out. In the event of any change in ownership of the Site, other than change to a successor municipality, the Company shall notify the successor of and provide the successor with a copy of this ECA, and the Company shall provide a copy of the notification to the District Manager and the Director.

Inspections

14. No person shall hinder or obstruct a Provincial Officer from carrying out any and all inspections authorized by the OWRA, the EPA, or the PA, of any place to which this ECA relates, and without limiting the foregoing:
 - (1) to enter upon the premises where the approved works are located, or the location where the records required by the conditions of this ECA are kept;
 - (2) to have access to, inspect, and copy any records required to be kept by the conditions of this ECA;
 - (3) to inspect the Site, related equipment and appurtenances;
 - (4) to inspect the practices, procedures, or operations required by the conditions of this ECA; and
 - (5) to sample and monitor for the purposes of assessing compliance with the terms and conditions of this ECA or the EPA, the OWRA or the PA.

Information and Record Retention

15. Any information requested, by the Ministry, concerning the Site and its operation under this ECA, including but not limited to any records required to be kept by this ECA shall be provided to the Ministry, upon request, in a timely manner.
16. The receipt of any information by the Ministry or the failure of the Ministry to prosecute any person or to require any person to take any action, under this ECA or under any statute, regulation or other legal requirement, in relation to the information, shall not be construed as:

- (1) an approval, waiver, or justification by the Ministry of any act or omission of any person that contravenes any term or condition of this ECA or any statute, regulation or other legal requirement; or
 - (2) acceptance by the Ministry of the information's completeness or accuracy.
17. All records required by the conditions of this ECA must be retained on Site for a minimum period of five (5) years from the date of their creation.
18. Any information relating to this ECA and contained in Ministry files may be made available to the public in accordance with the provisions of the Freedom of Information and Protection of Privacy Act, R.S.O. 1990, C. F-31.

2. FINANCIAL ASSURANCE

1. The Company shall maintain financial assurance as defined in Section 131 of the EPA, in the amount of four hundred eighty nine thousand six hundred and eighty-one dollars and zero cents (CAD489,681.00). This financial assurance shall be in a form acceptable to the Director and shall provide sufficient funds for Site closure and clean-up, including disposal of all quantities of waste permitted to be on Site at any one time;
2. Commencing on March 31, 2020, and every four (4) years thereafter, the Company shall provide to the Director a re-evaluation of the amount of the financial assurance to facilitate the actions required under Condition 2.1. Additional financial assurance, if required, must be submitted to the Director within twenty (20) days of written acceptance of the re-evaluation by the Director;
3. The amount of financial assurance is subject to review at any time by the Director and may be amended at his/her discretion; and
4. If any financial assurance is scheduled to expire or notice is received, indicating financial assurance will not be renewed, and satisfactory methods have not been made to replace the financial assurance at least sixty (60) days before the financial assurance terminates, the Company shall forthwith replace the financial assurance with cash.

3. DESIGN AND OPERATIONS REPORT

1. The Design and Operations Report shall be retained at the Site; kept up to date; and be available for inspection by Ministry staff.
2. Any changes made to the Design and Operations Report must first be approved by the Director prior to implementation.

3. The Company shall maintain a document control record at the Site that tracks all changes that are made to the Design and Operations Report.

4. GENERAL OPERATIONS

Hours of Operation

1. Waste may be processed at the Site twenty-four (24) hours a day, seven days a week, excluding statutory holidays.
2. Waste may be received and transported to and from the Site from 7:00 a.m. to 11:00 p.m., seven days a week, excluding statutory holidays.

Signage

3. The Company shall install a sign at the main entrance/exit to the Site on which legibly displays the following information:
 - (1) the name of the Site and Company;
 - (2) the number of this ECA;
 - (3) the telephone number for the Ministry's Spill Action Centre;
 - (4) the operating hours of the Site;
 - (5) a twenty-four (24) hour telephone number that can be used to reach the Company in the event of a complaint or an emergency; and
 - (6) the type of waste that is approved for receipt at the Site.

Security

4. The Company shall operate and maintain the Site in a secure manner, with access to the Site regulated and perimeter of the Site secured by fencing. During non-operating hours, the Site entrance and exit gates shall be locked and the Site shall be secured against access by unauthorized persons.

5. WASTE BUNKER CONSTRUCTION AND STORAGE TRANSITION

1. The Company may construct up to nine (9) temporary waste storage bunkers, as detailed in Item (35) of Schedule "A", to be used during the construction of the permanent, covered storage structure detailed in Item (36) of Schedule "A".
2. Each temporary bunker shall be constructed of suitable materials, and equipped with a

covering system that allows all waste stored within each bunker to be covered to prevent generation of contaminated stormwater.

3. The District Manager shall be notified at the completion of each bunker and shall detail the materials, dimensions and volumetric storage capacity of each bunker.
4. By no later than December 31, 2021, the Company shall store all glass waste within the confines of the permanent, covered storage bunker detailed in Item (36) of Schedule "A".

6. WASTE RECEIVING, STORAGE, SHIPPING AND PROCESSING

Waste Receiving

1. The Company shall not receive more than three thousand seven hundred and fifty (3,750) cubic metres of glass waste per day.
2. The Company shall not receive more than two hundred and fifty (250) cubic metres per day of liquid food processing waste at this Site.

Outdoor Storage of Glass Waste

3. The Company shall not store more than eleven thousand (11,000) cubic metres of glass waste outdoors at any one time.
4. Glass waste stored outdoors shall be fully contained in the outdoor storage bunkers at all times.
5. The Company shall cover all bunkers containing any waste at all times except when receiving or transferring waste.

Indoor Storage of Liquid Food Processing Waste

6. The Company shall not store more than 1,500,000 litres of liquid food processing waste at this Site comprised of no more than 631,000 L in storage tanks and 869,000 L in unopened retail beverage containers.
7. The Company shall not store any liquid food processing waste in the outdoor storage bunkers.
8. The Company shall maintain all containers used to store liquid food processing waste in good condition to prevent leakage. The Company shall immediately remove from service any leaking containers.
9. The Company shall ensure that the required containment systems for tank storage are maintained at all times to ensure against spills, leaks and discharges.

10. The Company shall ensure that all of the storage tanks used to store liquid food processing waste are fitted with audible level monitoring alarm systems to prevent spills and discharges.
11. The Company shall ensure that no tanker trucks containing liquid food processing waste is parked or remains on-site overnight.
12. The Company shall ensure that all storage tanks, process tanks and containment areas for all liquid food waste shall be designed, constructed and maintained to meet the minimum standards outlined in the "Guidelines for Environmental Protection Measures at Chemical Storage Facilities", dated May 2007, and as amended from time to time.
13.
 - (1) The Company may store containerized waste (bottles, cans, and kegs) destined for processing at the Site in up to twenty-six (26) trailers, limited to designated trailer storage areas as detailed in the Design and Operations Report.
 - (2) Trailers shall not store any waste for longer than two (2) weeks before the waste is removed and staged for processing.
 - (3) Condition 13(1) excludes any trailers in operation within the seven (7) designated dock areas at the Site.
14. The Company shall demarcate each indoor waste storage and staging area, as detailed in Item (29) of Schedule "A", and shall place a sign at each area, which must remain visible at all times, detailing the following:
 - (1) Specific waste/material type to be stored in the area;
 - (2) Maximum height of the waste to be stored in the area;
 - (3) Square footage of the waste storage area.

Storage Time

15. The Company shall not store any waste on-site in excess of ninety (90) days from the date of receipt, including but not limited to all glass and liquid food waste.

Residual Waste Shipments

16. The Site shall not ship more than two-hundred (200) tonnes of residual waste on any one day.

7. WASTE PROCESSING

1. Processing at the Site shall be limited to crushing, baling and sorting of recyclable

material and the processing of liquid food processing waste.

2. With the exception of waste loading and material conveyance, the Company shall ensure that all waste processing occurs indoors.
3. The Company shall ensure that the liquid food processing waste processed at this Site is collected and contained. Liquid food processing waste shall be discharged to the sanitary sewer, with approval of the municipality for such discharge; disposed of at a site for which a Environmental Compliance Approval has been issued by the Ministry or an equivalent government agency of appropriate jurisdiction; or for re-use as permitted by Section three subsection two (3(2)) of Reg. 347.

8. STORMWATER MANAGEMENT

1. The Company shall manage all discharges from this site, including storm water run-off in accordance with appropriate Municipal, Provincial and for Federal Legislation, Regulation and By-Laws.

9. NUISANCE CONTROL

Vermin and Insect

1. The Company shall ensure that a vermin and insect abatement program is implemented as outlined in Item 26 of Schedule "A".

Dust/Odour Control

2. If at any time nuisances are generated at the Site due to dust or odours, the Company shall take appropriate remedial action immediately, which may include temporary stoppage of site operations. The Company shall submit, within thirty (30) days of the incident, a written report to the District Manager identifying the source(s) of the complaint and details of what action was taken to rectify the problem and prevent a recurrence.
3. The Company shall ensure that at no time standing water is allowed to accumulate in any waste storage area or area in which the standing water could become contaminated with waste and result in increased fugitive odour generation.

10. COMPLAINT RESPONSE PROCEDURE

1. If at any time, the Company receives complaints regarding the operation of the Site, the Company shall respond to these complaints according to the following procedure:

- (1) The Company shall record and number each complaint, either electronically or in a log book, and shall include the following information:
 - (a) the nature of the complaint;
 - (b) the name, address and the telephone number of the complainant if the complainant will provide this information; and
 - (c) the time and date of the complaint;
- (2) The Company, upon notification of the complaint, shall initiate appropriate steps to determine all possible causes of the complaint, proceed to take the necessary actions to eliminate the cause of the complaint and forward a formal reply to the complainant; and
- (3) The Company shall complete and retain on-site a report written within one (1) week of the complaint date, listing the actions taken to resolve the complaint and any recommendations for remedial measures, and managerial or operational changes to reasonably avoid the recurrence of similar incidents.

11. SPILLS

Spill Response

1. All spills, as defined in the EPA, shall be immediately reported to the Ministry's Spill Action Centre at 1-800-268-6060 and to the local municipal authority.
2. The Company shall promptly take all necessary steps to contain and clean up any spills or upsets which result from this operation. All spills and upsets shall be recorded in a written log or an electronic file format, as to the nature of the spill or upset, and action taken for clean-up, correction and prevention of future occurrences.
3. In the event of a spill, the Company shall submit to the District Manager a written report within three calendar (3) days of any spill outlining the nature of the spill, remedial measures taken and the measures taken to prevent future occurrences at this Site.
4. The Company shall ensure that spill containment measures are constructed and maintained in accordance with the specifications outlined in Item 25 of Schedule "A".

Spill Prevention, Control & Countermeasures Plan

5. The Company shall implement and maintain a Spill Prevention, Control & Countermeasures Plan for the Site. The Spill Prevention, Control & Countermeasures Plan shall include, but not necessarily be limited to:
 - (1) emergency response procedures to be undertaken in the event of a spill or process upset, including specific clean up methods for each different type of waste the

Site is approved to accept;

- (2) a list of equipment and spill clean-up materials available in case of an emergency;
 - (3) contingency procedures to be followed in the event of equipment malfunction, a labour disruption, transportation disruption, inability of receiving sites to accept waste or other business disruption to the operation; and
 - (4) notification protocol with names and telephone numbers of persons to be contacted, including persons responsible for the Site, the Ministry's District Office and Spills Action Centre, the local municipal fire department, the local municipal authority, the local Medical Officer of Health, the Ministry of Labour, and the names and telephone numbers of waste management companies available for emergency response.
6. (1) The Company shall review the Spill Prevention, Control & Countermeasures Plan and shall update the plan if necessary whenever modifications are made to the Site; and
- (2) The Company shall review the Spill Prevention, Control & Countermeasures Plan on an annual basis as a minimum, and shall ensure that the names and telephone numbers of the persons to be contacted as required under Condition 11.5(4) are up-to-date, and that these numbers are prominently displayed and immediately available to all staff and emergency response personnel.
7. The District Manager shall be notified within thirty (30) days of any changes to the Spill Prevention, Control & Countermeasures Plan.
8. The equipment, materials and personnel requirements outlined in the Spill Prevention, Control & Countermeasures Plan are required to be kept on Site and shall be immediately available on the Site at all times. The equipment shall be kept in a good state of repair and in a fully operational condition.
9. The Company must conduct regular inspections of the equipment and facilities to ensure the spill containment measures are functioning as designed and that all equipment and facilities at the Site are operated in a manner that will not negatively impact the environment. Any deficiencies detected during these regular inspections, that might negatively impact the environment, must be promptly corrected. A written record of these inspections in the form of a log book, which includes the following, must be maintained at the Site for two years from its date of generation:
- (1) name and signature of trained personnel conducting the inspection;
 - (2) date and time of the inspection;
 - (3) list of equipment inspected and all deficiencies, that might negatively impact the

environment, observed;

- (4) a record of complaints received and action taken to address the complaint; and
- (5) recommendations for remedial action and actions undertaken;

12. OPERATIONAL CONTINGENCY PLAN

1. The Company shall maintain an Operational Contingency Plan for this site, which includes, as a minimum, the procedures to undertake in the event that waste can no longer be received by the Site due to volume, storage or processing restrictions or due to an adverse impact being caused by the operation.

13. EMERGENCY RESPONSE PLAN

1. (1) The Company shall maintain an Emergency Response Plan for this site, which includes as a minimum, the following:
 - (a) notification of persons responsible for the site including home phone numbers;
 - (b) list of emergency phone numbers for local Ministry office, Ministry's Spills Action Centre and the Local Fire Department;
 - (c) measures to prevent spills/fires;
 - (d) fire protection system, control and safety devices;
 - (e) measures for spill/fire alerting, containment, treatment, disposal and clean up;
 - (f) availability of spill/fire related equipment;
 - (g) maintenance and testing program for spill/fire related equipment; and
 - (h) training of site operators and site emergency response personnel.
- (2) The Company shall as a minimum, review the contingency plan on an annual basis, and shall submit to the District Manager, the Local Fire Department and the Regional Municipality of Hamilton-Wentworth, an updated Emergency Response Plan within thirty (30) days of any amendment to the contingency plan.

14. TRAINING

1. The Company shall maintain a training plan specific to the Site shall be developed and implemented to ensure that all employees that operate the Site or carry out any activity required under this ECA are trained in its operation.
2. The training plan shall require and ensure through proper written records that all persons directly involved with activities relating to the Site have been trained with respect to:

- (1) relevant waste management legislation, regulations and guidelines;
 - (2) major environmental concerns pertaining to the waste to be handled;
 - (3) occupational health and safety concerns pertaining to the processes and wastes to be handled;
 - (4) management procedures including the use and operation of equipment for the processes and wastes to be handled;
 - (5) the Spill Prevention, Control & Countermeasures Plan and in the procedures to be employed in the event of an emergency;
 - (6) specific written procedures for refusal of unacceptable waste loads;
 - (7) contingency procedures;
 - (8) specific written procedures for the control of nuisance conditions; and
 - (9) the requirements of this ECA.
3. The Company shall maintain a written record of training at the Site which includes:
- (1) date of training;
 - (2) the name and signature of the person who has been trained; and
 - (3) description of the training provided.
4. The Company shall review the training plan and update it as necessary whenever modifications are made to the Site.
5. The Company shall ensure that Trained personnel is/are on duty at all times when the Site is open to carry out any activity required under this ECA.

15. SITE INSPECTIONS

1. Trained Personnel shall carry out a visual inspection of the Site each day the Site is in operation to ensure that:
 - (1) the Site is secure and perimeter fencing is not compromised;
 - (2) that the operation of the Site is not causing any nuisances including those from dust, odours, vectors, vermin, birds, litter, noise and traffic;

- (3) that the operation of the Site is not causing any adverse effects on the environment; and
 - (4) that the Site is being operated in compliance with this ECA.
2. Any deficiencies discovered as a result of an inspection carried out under Condition 15.1 shall be remedied immediately, including the immediate removal of any standing water or temporarily ceasing operations at the Site if needed.
3. A record of the inspections shall be kept in the daily log book that includes the following information:
 - (1) the name and signature of person that conducted the inspection;
 - (2) the date and time of the inspection;
 - (3) a list of any deficiencies discovered;
 - (4) any recommendations for action; and
 - (5) the date, time and description of actions taken to remedy deficiency.

16. RECORD KEEPING

1. The Company shall maintain a daily record either electronically or in a log book which shall include the following information:
 - (1) the type, date and time of arrival, source, and quantity (by weight) of all waste received at the Site;
 - (2) the date, type, quantity (by weight) and destination of all residual waste and processed waste transferred from the Site;
 - (3) a record of any waste refusals which shall include: amounts, reasons for refusal and actions taken;
 - (4) a running total of the amount of waste received at the Site for the calendar year and a calculation of the average daily amount of waste that has been received at the Site for the calendar year;
 - (5) a running total of the amount of residual waste that has been transferred from the Site for final disposal for the calendar year and a calculation of the average daily amount of residual waste that has been transferred from the Site for final disposal for the calendar year;

- (6) a record of the daily inspections required by Condition 15.1; and
- (7) a record of any spills or process upsets at the site, the nature of the spill or process upset and the action taken for the clean up or correction of the spill, the time and date of the spill or process upset, and for spills, the time that the Ministry and other persons were notified of the spill in fulfilment of the reporting requirements in the EPA.

17. ANNUAL REPORT

1. On March 31, 2020, and on an annual basis thereafter, the Company shall submit to the District Manager, and retain on Site, a written report which covers the previous calendar year. The report shall include, at a minimum, the following information:
 - (1) a detailed monthly summary of the information required by condition 16.1(1) and 16.1(2) including an annualized reconciliation between all wastes received and processed at the Site and all residual wastes and processed wastes transferred from the Site;
 - (2) a summary of waste loads refused including the generator of the load, the licensed hauler of the load if the generator can not be determined, the date of refusal and reason for refusal of the load;
 - (3) any environmental and operational problems, that are likely to negatively impact the environment, encountered during the operation of the Site and during the facility inspections and any mitigative actions taken;
 - (4) a summary of complaints received and the actions taken to mitigate the issue associated with the complaint;
 - (5) a summary of any changes to the Design and Operations Report Design and the Spill Prevention Control and Countermeasures Plan that were made; and
 - (6) any recommendations to minimize environmental impacts from the operation of the Site and to improve Site operations and monitoring programs in this regard.

18. CLOSURE PLAN

1. Four (4) months prior to the permanent closure of the Site, the Company shall submit to the District Manager written notification of the decision to cease activities and a schedule for the implementation of the activities in accordance with the decommissioning activities outlined in Item 3 of Schedule "A".
2. The Company shall submit to the District Manager written notification of the decision to

cease activities at the Site and a schedule for the implementation of the activities in accordance with the decommissioning activities outlined in Item 3 of Schedule "A". The notification and schedule shall be submitted either four (4) months prior to the planned permanent closure of the Site or forthwith in the situation of an unplanned permanent closure of the Site or indefinite cessation of Site activities.

3. Within ten (10) days after closure of the Site, the Company shall notify the Director and the District Manager, in writing, that the Site is closed and that the decommissioning activities have been completed.

SCHEDULE "A"

The Schedule "A" forms part of the ECA No. A650041:

1. Application for a Certificate of Approval for a Waste Disposal Site (Processing) dated August 15, 1994, and received on October 4, 1994, including the supporting documentation submitted therewith.
2. Letter dated December 21, 1994, to Allan Rosen, Royal Recycling, from Brad Farnand, Ministry of Environment and Energy, RE: Additional Supporting Documentation.
3. Facsimile dated January 27, 1995, to Brad Farnand, Ministry of Environment and Energy, from Allan Rosen, Royal Recycling, RE: Submission of Additional Information.
4. Facsimile dated January 31, 1995, to Brad Farnand, Ministry of Environment and Energy, from Allan Rosen, Royal Recycling, RE: Submission of Additional Information.
5. Letter dated February 2, 1995, to Allan Rosen, Royal Recycling, from Brad Farnand, Ministry of Environment and Energy, RE: Request of Additional Information.
6. Facsimile dated February 3, 1995, to Brad Farnand, Ministry of Environment and Energy, from Jack Rosen, Royal Recycling, RE: Submission of Additional Information.
7. Facsimile dated February 7, 1995, to Brad Farnand, Ministry of Environment and Energy, from Jack Rosen, Royal Recycling, RE: Submission of Additional Information.
8. Facsimile dated February 10, 1995, to Brad Farnand, Ministry of Environment and Energy, from Jack Rosen, Royal Recycling, RE: Maximum Amount of Waste Received Per Day.
9. Facsimile dated February 13, 1995, to Brad Farnand, Ministry of Environment and Energy, from Allan Rosen, Royal Recycling, RE: Review of Draft Certificate of Approval No. A650041.
10. Letter of Credit #9301792-02 dated February 21, 1995, for fourteen dollars (\$14,000.00) submitted to Hardy Wong, Ministry of Environment and Energy on February 22, 1995.
11. Facsimile dated February 23, 1995, to Brad Farnand, Ministry of Environment and Energy, from Peter Costabile, Royal Recycling, RE: Fire Inspection Report.
12. Facsimile dated February 23, 1995, to Brad Farnand, Ministry of Environment and Energy, from Jack Rosen, Royal Recycling, RE: Property Ownership.
13. Revised Application for Approval of a Waste Disposal Site, dated March 13, 1995, submitted on April 18, 1995, including the supporting documentation submitted therewith.
14. Letter dated March 15, 1995, to Alison Braithwaite, Ministry of Environment and Energy, from J.J. Schatz, City of Hamilton, RE: Comments on Royal Recycling's Application for a Certificate

of Approval No. A650041 for a Waste Disposal Site (Processing).

15. Facsimile dated March 23, 1995, to Brad Farnand, Ministry of Environment and Energy, from Allan Rosen, Royal Recycling, RE: Outdoor Storage Bunkers.
16. Letter dated March 24, 1995, to Hardy Wong, Ministry of Environment and Energy, from Lynda Sohal, Regional Municipality of Hamilton-Wentworth, RE: comments on Royal Recycling's Application for a Certificate of Approval No. A650041 for a Waste Disposal Site (Processing).
17. Facsimile dated April 28, 1995, to Brad Farnand, Ministry of Environment and Energy, from Allan Rosen, Royal Recycling, RE: outdoor storage Bunkers.
18. Facsimile dated June 21, 1995, to Brad Farnand, Ministry of Environment and Energy, from Allan Rosen, Royal Recycling Limited, RE: Notice of Change and outdoor Bunker storage.
19. Letter dated March 26, 1999, from Jack Rosen, Royal Redycling Limited, to Mr. Geoff Carpentier, Ministry of the Environment (MOE), requesting an increase in the amount of waste received per day.
20. Letter dated May 25, 1999, from Larry Cobb, Stikeman, Elliott, Barristers & Solicitors, to the MOE advising of the change in name, due to a merger between Royal Recycling Limited and Canadian liquid Processors Limited.
21. Letter dated August 12, 1999, from Jack Rosen, Royal Recycling Limited, to Aruna Mohan, MOE, enclosing a copy of the circulation list of the neighbours notified.
22. Facsimile dated September 14, 1999, from Sean Furlong, Royal Recycling Limited, to Karen Wassink, MOE, enclosing Articles of Incorporation.
23. Letter dated September 21, 1999, from Aruna Mohan, MOE to Jack Rosen, Royal Recycling Limited, acknowledging the application for amendment and application fee.
24. Document entitled "Application for an Amendment to Provisional Certificate of Approval for a Waste Disposal Site (Processing) No. A650041, dated June 19, 2000 and prepared by DJA Environmental Consultants Inc.
25. Letter from D. Anderson, P.Eng., DJA Environmental Consultants Inc. to I. Parrott, MOE, dated November 9, 2000, including Drawing G2, Spill Containment Structures, re: Spill Containment Structures for Canadian Liquids Processor's Limited Facility located at 15 Biggar Avenue, Hamilton.
26. Letter from Tracey DiBussolo, PCO Services Inc. to B. Duncan, Royal Recycling, dated September 11, 2000.
27. Environmental Compliance Approval Application dated August 17, 2016, signed by Erica Seibert, Vice President, Corporate Development, and including all attached supporting

information.

28. Drawing entitled "Site Plan - Yard Layout", prepared by Emterra Group and included as part of the application above (Item 27).
29. Drawing entitled "Site Plan - Process & Equipment Layout", prepared by Emterra Group and included as part of the application above (Item 27).
30. Report dated June 29, 2018, entitled "Containment Verification Report", prepared by Pollutech Environmental Limited, for Canadian Liquid Processors Limited, including all attached drawings and figures.
31. Report dated October 11, 2018 entitled "Building A Containment Verification Report", prepared by Pollutech Environmental Limited, for Canadian Liquid Processors Limited, including all attached drawings and figures.
32. Email dated October 24, 2018 from David Lee, P. Eng., Senior Review Engineer, Environmental Assessment and Permissions Branch, Ministry of the Environment, Conservation and Parks to Greg Brown, Pollutech Consultants Ltd. requesting additional information.
33. Email dated November 2, 2018, from Greg Brown, Pollutech Consultants Ltd. to David Lee, MECP, detailing modifications to various containment areas including all attachments and supporting information.
34. Document entitled "Final Secondary Containment Plan" dated March 25, 2019, from Greg Brown, Pollutech Consultants Ltd. to David Lee, MECP, including all attached drawings and supporting information.
35. Letter dated February 28, 2019, to David Lee, MECP, from Sean O'Neill, General Manager, Canadian Liquid Processors Limited including attached drawing entitled "Site Plan - Yard Layout".
36. Environmental Compliance Approval Application dated September 21, 2018, signed by Emmie Leung, CEO of Canadian Liquid Processors Limited, including all attached supporting information, drawings and appendices.
37. Document entitled "Design & Operations Manual, Canadian Liquid Processors Limited, Hamilton Facility, 15 Biggar Avenue, Hamilton, Ontario", dated May 2019, and prepared by Canadian Liquid Processors Limited, including attached appendices and drawings.
38. Letter dated May 16, 2019, to David Lee, Senior Review Engineer, Ministry of the Environment, Conservation and Parks from Sean O'Neill, General Manager, Canadian Liquid Processors Limited. Re: New Glass Storage Building and Bunker Structure.

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

The reason for condition 1, paragraphs 1, 2, 3, 5 through 11, 15 through 18, is to clarify the legal responsibilities of the Company.

The reason for condition 1, paragraph 4 and conditions 3, 6, 7 is to ensure that the Site is operated in accordance with the applications and supporting documentation submitted by the Company, and not in a manner which the Director has not been asked to consider.

The reason for condition 1, paragraph 12 is to ensure that the Site is operated under the corporate name which appears on the application form submitted for this approval, to ensure that the Director is informed of any changes and to ensure that the former owners and/or operators of the Site are not involved in any aspect of the charge, management or control of the Site.

The reasons for condition 1, paragraph 13 are to restrict potential transfer or encumbrance of the Site without the approval of the Director and to ensure that any transfer of encumbrance can be made only on the basis that it will not compromise compliance with this ECA.

The reason for condition 1, paragraph 14 is to ensure that appropriate Ministry staff has ready access to the Site for inspection of facilities, equipment, practices and operations required by the conditions in this ECA. This condition is complimentary to the powers of entry afforded a Provincial Officer pursuant to the EPA and OWRA.

The reason for condition 2 is to ensure that sufficient funds are available to the Ministry to clean up the Site in the event that it appears the Company is unable or unwilling to do so.

The reason for condition 4, paragraphs 1 and 2 is to specify the hours of operation of the Site so that the Site is operated in a manner which does not result in a nuisance or a hazard to the health and safety of the environment and the public.

The reason for condition 4, paragraph 3 is to ensure that users of the Site are fully aware of the important information and restrictions related to Site operations and access under this ECA.

The reason for condition 4, paragraph 4 is to ensure the controlled access and integrity of the Site by preventing unauthorized access.

The reason for condition 5 is to compel the Company to initiate a waste reduction strategy to achieve completion of Site modifications purposed to improve Site operations.

The reason for conditions 8 is to minimize the risk of contamination to the natural environment, to prevent nuisance or adverse effects from occurring, and to minimize the egress of contaminants for this purpose.

The reason for condition 9 is to ensure the Site is operated in a manner which minimizes impacts from

vermin, insects, dust and odours and does not result in a nuisance or a hazard to the health and safety of the environment or people.

The reason for condition 10 is to ensure that any complaints regarding operations at the Site are responded to in a timely manner.

The reason for condition 11, paragraphs 1 through 4 is to ensure that staff are properly trained in the operation of the equipment used at the Site and emergency response procedures. This will minimize the possibility of spills occurring and will enable staff to deal promptly and effectively with any spills that do occur.

The reason for condition 11, paragraphs 5 through 9 is to ensure that Emergency Response Plans are developed and maintained at the Site and that those involved with the Site are properly trained in the operation of the equipment used at the Site and emergency response procedures.

The reason for condition 12 is to ensure the Company maintains contingency plans to consider actions in the case of any interruptions to Site operations that may result in the potential for any adverse effects.

The reason for condition 13 is to ensure the Regional Municipality of Hamilton-Wentworth, the Ministry and the Local Fire Department are familiar with this site's operations and its associated hazards in the event of an emergency situation and to ensure each have an up-to-date emergency response plan to minimize the time in assessing an emergency incident, to minimize the risk of accidental discharge of contaminants into the environment, and for the prompt control and clean-up of emergency incidents.

The reason for condition 14 is to ensure that the Site is operated by properly trained staff in a manner which does not result in a hazard of nuisance to the natural environment or any person.

The reason for condition 15 is to ensure that detailed records of Site inspections are recorded and maintained for inspection and information purposes.

The reasons for condition 16 are to provide assessment of effectiveness and efficiency of site design and operation, their effect or relationship to any nuisance of environmental impacts, and the occurrence of any public complaints or concerns. Record keeping is necessary to determine compliance with this ECA, the EPA and its regulations.

The reasons for condition 17 are to ensure that regular review of site development, operations and monitoring data is documented and any possible improvements to site design, operations or monitoring programs are identified. An annual report is an important tool used in reviewing site activities and for determining the effectiveness of site design.

The reason for condition 18 is to ensure that the Site is closed in accordance with Ministry standards and to protect the health and safety of the public and environment.

Upon issuance of the environmental compliance approval, I hereby revoke Approval No(s). A650041 issued on June 8, 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

*** 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 <https://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 January, 2020



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

DL/

c: District Manager, MECP Hamilton - District
Hardy Wong EPM International Inc., Canadian Liquids Processors Limited