

AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 5829-BE4Q3R
Issue Date: January 9, 2020

NGF Canada Limited
255 York Rd
Guelph, Ontario
N1E 3G4

Site Location: 255 York Road
255 York Rd
Guelph City, County of Wellington
N1E 3G4

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 facility manufacturing rubber-impregnated fibreglass and carbon fibre cords at the annual production rates of 1,576,512 kilograms of coated cords, consisting of the following operations and equipment;

- one (1) regenerative thermal oxidizer (RTO, source RTO-1), operating at 775 degrees Celsius and minimum destruction/removal efficiency of 96%, equipped with natural gas fired burner, having a maximum heat input of 2,532,200 kilojoules per hour, discharging into the atmosphere at a nominal volumetric flow rate of 9.1 cubic metres per second at an approximate temperature of 315 degrees Celsius, through a stack, having an exit diameter of 0.61 metre, extending 12.2 metres above the roof and 17.6 metres above grade;
- two (2) RTO by-pass exhausts (source RTO-1A and RTO-1B), used to release heat build-up and for start-up and shutdown operations only, when no processing occurs at the facility, having the following stack parameters;
 - RTO-1A stack - horizontal stack, having an exit diameter of 0.25 metre, extending 1.8 metres above the roof and 7.2 metres above grade; and
 - RTO-1B stack - vertical stack, having a rectangular opening of 0.61 metre by 0.45 metre, extending 3.0 metres above the roof and 8.4 metres above grade;
- natural gas fired process equipment including; one (1) RTO-Oven (rated at 10,043,600 kilojoules per hour), one (1) Make-Up Air Unit (rated at 1,380,570 kilojoules per hour), and one (1) Duct Heater

(rated at 2,671,470 kilojoules per hour), discharging into the atmosphere through the RTO;

- one (1) wet type scrubber (source G41), to control emissions from latex mixing operations and a manual parts washer, discharging into the atmosphere at a maximum volumetric flow rate of 1.0 actual cubic metre per second at an approximate temperature of 20 degrees Celsius, through a stack, having exit diameter of 0.46 metre, extending 2.1 metres above the roof and 10.1 metres above grade;
- one (1) horizontal exhaust system (source G54), serving an ammonium hydroxide tote passive vent, discharging into the atmosphere through a side wall stack, having an exit diameter of 0.03 metre, extending 6.4 metres above grade;
- four (4) general exhaust systems (sources G43, G11, G16 and G20), venting into the atmosphere as per Schedule "A";
- natural gas fired heating units (sources HVAC2, F1, F2, G1, G3, G6, G8, G58,10, 11, 11A, 11B, 12A 12B and 13), having a total maximum heat input of 3,380,220 kilojoules per hour;

SCHEDULE A. General Exhausts.

Source ID	Description	Exhaust Volumetric Flow Rate (cubic metre per second)	Stack Exit Diameter (metre)	Stack Height Above Roof (metre)	Stack Height Above Grade (metre)
G43	General Exhaust - Mezzanine Level	6.3	0.79 x 0.79	2.3	10.3
G11	General Exhaust - Production/Oven Area	5.3	0.76	0.9	6.3
G16	General Exhaust - Production/Oven Area	5.3	0.76	0.9	6.3
G20	Muffle Furnace Lab Exhaust	0.3	0.20	0.5	5.9

all in accordance with the Application for Approval (Air & Noise) submitted by NGF Canada Limited dated January 30, 2019, and signed by Daniel Palubski, Operation Manager; the Emission Summary and Dispersion Modelling Report dated September 7, 2018, the Acoustic Assessment Report dated September 5, 2018, the email from Mary Mekhail (Pinchin Ltd.) dated July 23, 2019 and all other supporting information associated with the application.

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 NGF Canada 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 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*;
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. "*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.
10. "*Report EPS 1/PG/7*" means the report titled "Protocols and Performance Specifications for Continuous Monitoring of Gaseous Emissions from Thermal Power Generation" dated December 2005 and published by Environment Canada, 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 verification of the wet scrubber working parameters;
- b. implement the recommendations of the *Manual*.

2. RECORD RETENTION

1. The *Company* shall retain, for a minimum of two (2) years from the date of their creation, all records and information related to or resulting from the recording activities required by this *Approval*, and make these records available for review by staff of the *Ministry* upon request. The *Company* shall retain:
- a. all records on the maintenance, repair and inspection of the *Equipment*; and
 - b. all records of any environmental complaints, including:
 - i. a description, time and date of each incident to which the complaint relates;
 - ii. wind direction at the time of the incident to which the complaint relates; and
 - iii. a description of the measures taken to address the cause of the incident to which the complaint relates and to prevent a similar occurrence in the future.

3. NOTIFICATION OF COMPLAINTS

1. The *Company* shall notify the *District Manager*, in writing, of each environmental complaint within two (2) business days of the complaint. The notification shall include:
- a. a description of the nature of the complaint; and
 - b. the time and date of the incident to which the complaint relates.

4. NOISE

1. The *Company* shall, at all times, ensure that the noise emissions from the *Facility* comply with the limits set out in *Ministry Publication NPC-300*.

5. REGENERATIVE THERMAL OXIDIZER (OXIDIZER)

1. The *Company* shall ensure that the oxidizer is operated to comply, at all times, with the following requirements:
- a. The gaseous waste stream from the process is not introduced into the oxidizer, until the

- temperature in the combustion chamber has reached a minimum of 775 degrees Celsius, as measured by a continuous monitoring device at the outlet of the combustion chamber;
- b. A minimum operating temperature of 775 degrees Celsius is maintained in the oxidizer combustion chamber, at a point representing minimum 0.5 second residence time, at all times when the oxidizer is in operation and waste stream gases are directed to the oxidizer for destruction;
2. The Company shall continuously monitor and record the temperature in the combustion chamber of the oxidizer, when the oxidizer is in operation. 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
Response Time (95%)	60 sec. (max)
Operating Range (Full Scale)	1.5 times approval limit
Standard Tolerance	± 2.2 °C or ± 0.75%
Resolution	0.1 °C
Calibration	Per manufacturer's recommendations

LOCATION:

The sample point for the continuous temperature monitoring and recording system shall be installed in accordance with the requirements of *Report EPS 1/PG/7* at a location where the measurements are representative of the minimum temperature of the undiluted gases leaving the flare stack.

RECORDER:

The recorder must be capable of registering continuously the measurement of the monitoring system without a significant loss of accuracy and with a time resolution of 5 minutes or better.

RELIABILITY:

The monitor shall be operated and maintained so that accurate data is obtained during a minimum of 90 percent of the time for each calendar quarter during the first full year of operation, and 95 percent, thereafter.

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 keep records and to provide information to staff of the *Ministry* so that compliance with the *EPA*, the Regulations and this *Approval* can be verified.
3. Condition No. 3 is included to require the *Company* to notify staff of the *Ministry* so as to assist the *Ministry* with the review of the site's compliance.
4. Conditions No. 4 and No. 5 are 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). 5953-7NFMQ2 issued on January 30, 2009.

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 9th day of January, 2020



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

JK/

c: District Manager, MECP Guelph
Mary Mekhail, Pinchin Ltd.