

**ENVIRONMENTAL COMPLIANCE APPROVAL**

NUMBER 8428-BJ9R6A

Issue Date: February 28, 2020

PPG Architectural Coatings Canada, Inc.  
8200 Keele Street  
Vaughan, Ontario  
L4K 2A5

**Site Location:** 8200 Keele Street  
City of Vaughan, Regional Municipality Of York

*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) soil vapour extraction and treatment system equipped with one (1) granular activated carbon unit (GAC), discharging to the air through a stack having a maximum volumetric flow rate of 0.17 cubic metre per second, an exit diameter of 0.152 metre, extending 1 metre above the roof and 5 metres above grade; and
- one (1) soil vapour extraction and treatment system equipped with one (1) electric catalytic oxidizer, discharging to the air through a stack having a maximum volumetric flow rate of 0.17 cubic metre per second, an exit diameter of 0.152 metre, extending 1 metre above the roof and 5 metres above grade;

all in accordance with the Environmental Compliance Approval Application submitted by PPG Architectural Coatings Canada, Inc., dated August 22, 2019 and signed by Bhaskar Saha; the supporting information including the Emission Summary and Dispersion Modelling reports prepared by Arcadis Canada Inc., dated August 23, 2019 and signed by Tara Bailey; an email dated November 22, 2019 from Jennifer Son of Arcadis Canada Inc., and an email dated February 5, 2020 from Derek Rosso of Arcadis Canada Inc.

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

1. "*Annual Report*" means a report containing the results of the *Monitoring Plan* implementation for the preceding year;
2. "*Approval*" means this Environmental Compliance Approval, including the application and supporting documentation listed above;

3. "*Company*" means PPG Architectural Coatings Canada, Inc., that is responsible for the construction or operation of the *Facility* and includes any successors and assigns;
4. "*Continuous Temperature Monitoring System*" means the continuous monitoring process, monitoring equipment, and data collection parameters for monitoring the operating temperature of the catalytic oxidizer;
5. "*District Manager*" means the District Manager of the appropriate local district office of the *Ministry* where the *Facility* is geographically located;
6. "*Emission Summary Table*" means a table described in paragraph 14 of subsection 26 (1) of *O. Reg. 419/05*;
7. "*EPA*" means the Environmental Protection Act, R.S.O. 1990, c.E.19, as amended;
8. "*Equipment*" means the two (2) soil vapour extraction and treatment systems described in the *Company's* application, this *Approval* and in the supporting documentation submitted with the application, to the extent approved by this *Approval*;
9. "*ESDM Report*" means the Emission Summary and Dispersion Modelling Report prepared in accordance with section 26 of *O. Reg. 419/05* and the *Procedure Document* by Arcadis Canada Inc., dated August 23, 2019 and signed by Tara Bailey, submitted in support of the application including any addendum submissions made during the *Ministry's* review of the *Company's* application;
10. "*Exhausted*" means the capacity of the *GAC* to adsorb contaminant emissions is reached and the granular activated carbon filter unit is no longer able to effectively reduce emissions;
11. "*Facility*" means the entire operation located on the property where the *Equipment* is located;
12. "*GAC*" means granular activated carbon;
13. "*Manual*" means a document or a set of documents that provide written instructions to staff of the *Company*;
14. "*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;
15. "*Monitoring Plan*" means a written monitoring plan developed for the site as described in Condition 3;
16. "*O. Reg. 419/05*" means Ontario Regulation 419/05, Air Pollution – Local Air Quality, as amended;
17. "*Procedure Document*" means *Ministry* guidance document titled "Procedure for

Preparing an Emission Summary and Dispersion Modelling Report" dated March 2018, as amended;

18. "*Process*" means the soil vapour extraction and treatment process as described in the *Company's* application, this *Approval* and in the supporting documentation submitted with the application, to the extent approved by this *Approval*;
19. "*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;
20. "*Remedial Work Plan*" means the overall plan, developed for the site that contains as a minimum the remedial objectives, an overview of the extent of contamination at the site, and closure conditions to remove the *Process and Equipment* from the site;
21. "*Schedule*" means the schedule(s) attached to, and forming part of, this *Approval*, namely:
  - Schedule "A" - Continuous Temperature Monitoring System;
22. "*Soil, Groundwater and Sediment Standards*" means the *Ministry* publication "Soil, Groundwater and Sediment Standards for Use under Part XV.1 of the Environmental Protection Act" dated April 15, 2011, as may be amended;
23. "*Supporting Documents*" means the *Ministry* publications that accompany the Soil, Groundwater and Sediment Standards including "Guide for Completing Phase II Environmental Site Assessment under Ontario Regulation 153/04" dated June 2011, as amended; and
24. "*Target Compounds*" means the volatile organic compounds as described in the *Company's* application, this *Approval* and in the supporting documentation submitted with the application, to the extent approved by this *Approval*, that the *Equipment* is designed to treat.

*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. PERFORMANCE REQUIREMENTS**

1. The *Company* shall, at all times, design and operate the *Process* with the intent to reduce the soil/groundwater concentrations of the *Target Compounds* to comply with the appropriate criteria provided in the *Soil, Groundwater and Sediment Standards*, appropriate worker health and safety

criteria, or site specific criteria developed in accordance with the *Supporting Documents*.

2. The *Company* shall, before commencement of operation of the *Process* at the site, prepare a *Remedial Work Plan* for the site.
3. The *Company* shall ensure that the noise emissions from the *Process* and *Equipment* at the site comply with the limits set out in *Ministry Publication NPC-300*.
4. The *Company* shall ensure that the *GAC* and catalytic oxidizer maintains a removal efficiency greater than or equal to 95% and 99.5% respectively for the *Target Compounds*.

## 2. 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. procedures to inspect, test and replace the *GAC* before it is *Exhausted*;
    - iii. procedures to calibrate temperature monitoring and recording equipment for the catalytic oxidizer as specified in *Schedule "A"*;
    - iv. procedures to measure and maintain the removal efficiency of the *Target Compounds* by the *GAC* and the catalytic oxidizer;
    - v. procedures to prevent upset conditions and contingency measures;
    - vi. emergency procedures, including spill clean-up procedures;
    - vii. procedures for any record keeping activities relating to the operation and maintenance of the *Equipment*; and
    - viii. all appropriate measures to minimize noise and odorous emissions from all potential sources;
  - b. implement the recommendations of the *Manual*.
2. The *Company* shall ensure that the *GAC* is replaced before it is *Exhausted*.
3. The *Company* shall, before commencement of operation of the catalytic oxidizer, install and maintain a *Continuous Temperature Monitoring System*

to comply with the requirements outlined in *Schedule "A"*.

4. The *Company* shall not direct any soil vapour to the catalytic oxidizer until the temperature of the catalyst bed of the oxidizer has reached a minimum temperature of 330 degrees Celsius.

### 3. MONITORING AND REPORTING

1. The *Company* shall submit to the *District Manager*, not later than two (2) months before commencement of operations at the site, a draft *Monitoring Plan* for the operation of the *Process and Equipment* at the site. The *Monitoring Plan* shall be designed in accordance with the *Supporting Documents*, for the soil vapour/groundwater at the site to document that the Performance Requirements outlined above are not exceeded and that the *Remedial Work Plan* objectives are met. The finalized *Monitoring Plan* shall be implemented upon commencement of operations at the site and include, as a minimum, the following:

- a. the *Monitoring Plan* objectives;
- b. a list of analytical and/or indicator parameters;
- c. operating parameters for the *Equipment and Process*;
- d. procedures to monitor the removal efficiency of the *GAC* and catalytic oxidizer;
- e. a methodology to measure the concentrations of contaminants in the gas discharging to the air;
- f. procedures for monitoring any potential off-site migration of the *Target Compounds*;
- g. approximate monitoring locations and frequency; and
- h. sampling methodology and QA/QC procedures, when applicable.

2. The *Company* shall submit, not later than **April 1, 2021** and each subsequent year thereafter, to the *District Manager* an *Annual Report* on the results of the *Monitoring Plan* implementation for the preceding year. Each *Annual Report* shall include, as a minimum, the following:

- a. an overview of the operation of the system;
- b. the frequency and scope of the monitoring adopted;
- c. a summary of the results of analytical and/or indicator parameters of the level of contamination at the site;

- d. a trend analysis for the *Target Compounds*;and
  - e. an updated *Emission Summary Table* if monitoring results indicate that contaminant emission rates are higher than the original emission estimates described in the *Company's ESDM Report*.
3. The *Company*,upon submission of the third *Annual Report*,with approval from the *District Manager*,may amend the Performance Requirements and Monitoring and Reporting requirements of this *Approval*.

#### **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
  - 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.

#### **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;
  - b. the time and date of the incident to which the complaint relates; and
  - c. the actions taken to resolve the complaint and any recommendations for remedial measures.

## **SCHEDULE A**

### **Continuous Temperature Monitoring System**

## LOCATION:

The continuous temperature monitors shall be located at a location where the measurements are representative of the actual operating temperatures required for the catalytic oxidizer to achieve the removal efficiency specified in Condition 1.4.

## PERFORMANCE:

The continuous temperature monitor shall meet the following minimum performance specifications for the following parameters:

	PARAMETERS	SPECIFICATION
1.	Type:	shielded "K" type thermocouple, or equivalent
2.	Accuracy:	± 5 degrees Celsius

## 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 No. 1 is included to provide the minimum performance requirements considered necessary to prevent adverse effects.
2. Condition No. 2 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*.
3. Condition No. 3 is included to require the *Company* to gather accurate information so that compliance with the *EPA*, the regulations and this *Approval* can be verified.
4. Condition No. 4 is included to require the *Company* to 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.
5. 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.

*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.

*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](http://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 28th day of



February, 2020

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

BR/  
c: District Manager, MECP York-Durham  
Tara Bailey, Arcadis Canada Inc.