

**AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL**

NUMBER 6584-5MSJPK  
Issue Date: June 22, 2020

K. Winter Sanitation Inc.  
2816 6th Line  
Innisfil, Ontario  
L9S 4S4

Site Location: 2816 Sixth Line  
Innisfil Town, County of Simcoe  
L9S 4S4

*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, serving the Province of Ontario, all in accordance the application and supporting information as listed in Schedule "A",

for the transfer of Hauled Sewage from residential and commercial establishments:

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

**“Approval”** means Environmental Compliance Approval No. 6584-5MSJPK;

**"Company"** and **"Owner"** means K. Winter Sanitation Inc., including its officers, employees, agents or contractors;

**"Director"** means any Ministry employee appointed by the Minister pursuant to Section 5 of the EPA as a Director for the purposes of Section 39 of the EPA;

**"District Manager"** means the District Manager, Barrie District Office, Ontario Ministry of the Environment, Conservation and Parks;

**“EPA”** means the *Environmental Protection Act* , R.S.O. 1990, C. E-19 as amended;

**“Hauled Sewage”** is as defined in Regulation 347, R.R.O. 1990, as amended;

"**Leaching Bed**" and "**Tile Bed**" means the Leaching Bed as depicted in the Site Diagram entitled "Figure 1, K. Winter Sanitation, Hydrogeological Investigation of Leaching Bed", Item 7. of Schedule "A".

"**Ministry**" means the Ontario Ministry of the Environment, Conservation and Parks;

"**Reg. 347**" means R.R.O. 1990, Reg. 347: (General - Waste Management), made under the EPA; and

"**Site**" means the operation being approved under this Approval, located at 2816 Sixth Line, Innisfil, Ontario.

*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) Except as otherwise provided by these Conditions, the Site shall be operated in accordance with the plans, specifications and information listed in the attached Schedule "A".
- (2) Where there is a conflict between a provision of any document referred to in Condition (1) and the Conditions of this Approval, the Conditions in this Approval shall take precedence.
- (3) Requirements specified in this Approval are the requirements under the EPA. Issuance of this Approval in no way abrogates the Company's legal obligations to take all reasonable steps to avoid violating other applicable provisions of the EPA and other legislation and regulations and to obtain any other approvals required by legislation.
- (4) Requirements of this Approval are severable. If any requirement of this Approval, or the application of any requirement of this Approval to any circumstance, is held invalid, the application of such requirement to other circumstances and the remainder of this Approval shall not be affected thereby.
- (5) The Company must ensure compliance with all terms and Conditions of this Approval. Any non-compliance constitutes a violation of the EPA and is grounds for enforcement.
- (6) The Company shall ensure that all communications/correspondence made pursuant to this Approval reference the Approval Number 6584-5MSJPK.
- (7) The Company shall notify the Director in writing of any of the following changes within thirty (30) days of the change occurring:
  - (a) (i) change of Owner or operator of the Site or both;

- (ii) change of address or address of the new Owner;
  - (iii) change of partners where the Owner or operator is or at any time becomes a partnership, and a copy of the most recent declaration filed under the *Business Names Act*, 1991 shall be included in the notification to the Director;
  - (iv) any change of name of the corporation where the Owner or operator is or at any time becomes a corporation, and a copy of the most current "Initial Notice or Notice of Change" (form 1 or 2 of O. Reg. 182, Chapter C-39, R.R.O. 1990 as amended from time to time), filed under the *Corporations Information Act* shall be included in the notification to the Director; and
  - (v) change in directors or officers of the corporation where the Owner or operator is or at any time becomes a corporation, and a copy of the most current "Initial Notice or Notice of Change" as referred to in 7(a)(iv), supra;
- (b) In the event of any change in ownership of the Site, the Owner shall notify in writing the succeeding owner of the existence of this Approval, and a copy of such notice shall be forwarded to the Director.
- (8) The Company shall allow Ministry personnel, or a Ministry authorized representative(s), upon presentation of credentials, to:
- (a) carry out any and all inspections authorized by Section 156, 157 or 158 of the EPA, Section 15, 16, or 17 of the *Ontario Water Resources Act*, R.S.O. 1990, or Section 19 or 20 of the *Pesticides Act*, R.S.O. 1990, as amended from time to time, of any place to which this Approval relates; and,
- without restricting the generality of the foregoing to:
- (b) (i) enter upon the premises, at any reasonable time, where the records required by the Conditions of this Approval are kept;
  - (ii) have access to and copy, at any reasonable time, any records required by the Conditions of this Approval;
  - (iii) inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations required by the Conditions of this Approval; and,
  - (iv) sample and monitor at reasonable times for the purposes of assuring compliance with the Conditions of this Approval.
- (9) (a) The Company shall, forthwith upon request of the Director, District Manager, or Provincial Officer (as defined in the EPA), furnish any information requested by such

persons with respect to compliance with this Approval, including but not limited to, any records required to be kept under this Approval; and,

- (b) In the event the Company provides the Ministry with information, records, documentation or notification in accordance with this Approval (for the purposes of this Condition referred to as "Information"),
  - (i) the receipt of Information by the Ministry;
  - (ii) the acceptance by the Ministry of the Information's completeness or accuracy; or
  - (iii) the failure of the Ministry to prosecute the Company, or to require the Company to take any action, under this Approval or any statute or regulation in relation to the Information

shall not be construed as an approval, excuse or justification by the Ministry of any act or omission of the Company relating to the Information, amounting to non-compliance with this Approval or any statute or regulation.

- (10) All records and monitoring data required by the Conditions of this Approval must be kept on the Site for a minimum period of at least five (5) years.
- (11) All Hauled Sewage must be managed at the Site and transported to and from the Site in accordance with Reg.347.
- (12) This Approval does not relieve the Company from the prohibitions against pollution in the statutes and does not permit an emission into the environment that contains concentrations of contaminants that have, or are likely to have, an adverse effect on the environment.
- (13) This Approval supersedes and replaces all previously issued Approvals issued under Part V and/or former Part VIII of the EPA with respect to this specific operation.

### **Site Operations**

- (14) (a) Only Hauled Sewage shall be temporarily stored and blended at this facility; and,
  - (b) If at any time, problems such as odours, noise, vermin, vector, litter, dust and/or any other nuisances are generated at the Site, resulting in an impact to the environment and the public and/or complaint(s) received by this Ministry and validated by a Provincial Officer, then upon request of the Ministry, immediately take appropriate remedial action to rectify the problem. Appropriate remedial action may include temporary stoppage of all operations until the problem has been rectified and measures have been undertaken to prevent future occurrences.
- (15) The total volume of Hauled Sewage stored at the site shall not exceed 115,500 Litres at any time

in the following tanks:

- (a) 68,200 L Concrete Tank
  - (b) 27,500 L Concrete Tank
  - (c) 4,500 L concrete tank
  - (d) 2,250 L concrete tank
  - (e) 4,500 L concrete tank
  - (f) 4,500 L steel tank (used as pump tank for leaching bed disposal)
- (16) The Leaching Bed shall not receive more than 199 litres every 2 hours, for period of 4 minutes at a time and no more than 12 times per day, to a total of 2,425 litres per day;
- (17) Hauled Sewage transferred from the Site must be disposed of at a facility which is approved to receive that type of waste.
- (18) The Company shall ensure that all operators at the Site have been trained with respect to:
- (a) the terms, Conditions and operating requirements of this Approval;
  - (b) the operation and management of all transfer, storage and contingency measures equipment;
  - (c) any environmental concerns pertaining to the Site and Hauled Sewage to be transferred; and,
  - (d) relevant waste management legislation and Regulations under the EPA and the *Ontario Water Resources Act* .
- (19) The Site must be maintained in a secure manner, such that unauthorized persons cannot enter the Site.
- (20) The Company shall ensure that:
- (a) The Site is:
    - (i) Operated and maintained in an environmentally safe and secure manner; and,
    - (ii) That Hauled Sewage is properly stored at the Site, so as not to pose a threat or nuisance to the health and safety of the public, Site personnel and the environment;
  - (b) Any opening to the tank with the exception of the access hole, inlet pipe used to drain waste into the tank, and the outlet pipe used to drain waste out of the tank are to be sealed;

- (c) The access opening to the tank is fitted with a leakproof cover and be capable of being secured if necessary;
  - (d) The maximum storage capacity of each tank shall not be exceeded;
  - (e) The Site personnel trained in spill contingency planning shall be on duty at all times when Hauled Sewage is being discharged to, or pumped from, the tank at the Site; and,
  - (f) The tank shall be periodically emptied and an internal inspection of the tank shall be carried out to ensure the integrity of its structure.
- (21) The Environmental Monitoring Program shall be undertaken by the Owner in accordance with the environmental monitoring program set out in Schedule "B".
  - (22) Any proposed changes to the report/monitoring program, including the frequency of submission, shall be submitted to the District Manager in writing for approval. Approval by the District Manager is required prior to implementation of these changes.
  - (23) In the event that new sampling locations are added to the program, the owner shall notify the District Manager in writing no later than 7 days after the sampling that the locations have been added to the sampling program.
  - (24) As built drawings of all tanks in the ground shall be kept onsite at all times.
  - (25) The Company shall ensure that contingency equipment and materials necessary for emergency response in the event of a spill are immediately available and that operating personnel are trained in their use.
  - (26) The Company shall promptly take all necessary steps to contain and clean up any spills which result from the operation of the Site. All spills and upsets shall be immediately reported to the Ministry's Spills Action Centre at (416) 325-3000 or 1-800-268-6060 and shall be recorded in a written log or an electronic file, referred to in Condition (27) of this Approval, as to the nature of the spill or upset, and the action taken for clean-up, correction and prevention of future occurrences.

### **Inspection and Record Keeping**

- (27) The Company shall ensure that regular inspections of the equipment and facilities, by a qualified employee, as identified in Condition (18), are conducted, to ensure that all equipment and facilities at the Site are operated in a manner that will not cause an adverse effect on the environment. Any deficiencies, that might negatively impact the environment, detected during these regular inspections, shall be promptly corrected. A written record must be maintained at the Site, which includes the following:
  - (a) name and signature of qualified personnel conducting the inspection;

- (b) date and time of the inspection;
  - (c) list of equipment inspected and all observed deficiencies that might cause an adverse effect to the environment;
  - (d) recommendations for remedial action and actions undertaken, including a schedule for action to be undertaken in the future;
  - (e) date and time of maintenance activity; and,
  - (f) a detailed description of the maintenance activity.
- (28) The Company must ensure that a qualified employee conducts, on each operating day, a visual inspection of the following areas to ensure the Site is secure and that no off-site impacts such as vermin, vectors, odour, dust, litter and noise, result from the operation of the facility:
- (a) visual inspection of external condition of the tank for evidence of structural failure, seepage, or overflowing;
  - (b) inspection of Hauled Sewage level in the tank to ensure that a minimum 0.3 metre freeboard (distance between Hauled Sewage surface and top of the tank) is maintained at all times;
  - (c) loading/unloading area; and,
  - (d) storage/transfer area.
- (29) The Company shall maintain, at the Site for a minimum of five (5) years, a log book or electronic file which records daily the following information:
- (a) date of record;
  - (b) volume, date and source of Hauled Sewage received;
  - (c) volume, date and destination of Hauled Sewage shipped from the Site;
  - (d) all complaint(s) received and action(s) taken to rectify the problem; and,
  - (e) description of any spill including the nature of the spill or upset, and the action taken for clean-up, correction and prevention of future occurrences.

### **Annual Report**

- (30) By **March 31, 2021**, and on an annual basis thereafter, the Company shall prepare and submit to

the District Manager an annual report covering the previous calendar year. Each report shall include, as a minimum, the following information:

- (a) summary of operation of the Site over the year including maintenance requirements for the tank and repair of the tank, or the like, if any;
- (b) summary of volumes of Hauled Sewage and approximate annual quantity from each source;
- (c) the location of each disposal site, approximate volume and dates at which disposal occurred;
- (d) the results and interpretation of the results of the monitoring required by Schedule "B" prepared by a qualified hydrogeologist, engineer or scientist;
- (d) report of any operational difficulties during removal and disposal of Hauled Sewage; and,
- (e) a statement as to compliance with all Conditions of this Approval and with the inspection and reporting requirements of the Conditions herein.

#### **Financial Assurance**

- (31) (a) Within 60 days of issuance of this Approval, the Owner shall submit to the Director Financial Assurance, as defined in Section 131 of the EPA, for the amount of \$ 18,750.00. This Financial Assurance shall be in a form acceptable to the Director and shall provide sufficient funds for the analysis, transportation, Site clean-up, monitoring and disposal of all quantities of waste on the Site at any one time.
- (b) Commencing on March 1, 2023, and at intervals of three (3) years thereafter, the Owner shall submit to the Director, a re-evaluation of the amount of Financial Assurance to implement the actions required under Condition 31 (a). The re-evaluation shall include an assessment based on any new information relating to the environmental conditions of the Site and shall include the costs of additional monitoring and/or implementation of contingency plans required by the Director upon review of the closure plan and annual reports. The Financial Assurance must be submitted to the Director within ten (22) days of written acceptance of the re-evaluation by the Director.
- (c) Commencing on March 1, 2021, the Owner shall prepare and maintain at the Site an updated re-evaluation of the amount of Financial Assurance required to implement the actions required under Condition 31 (a) for each of the intervening years in which a re-evaluation is not required to be submitted to the Director under Condition 31 (b). The re-evaluation shall be made available to the Ministry, upon request.
- (d) The amount of Financial Assurance is subject to review at any time by the Director and may be amended at his/her discretion. 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 Financial Assurance shall forthwith be replaced by cash.

**Closure Plan**

- (32) (a) The Company must submit, for approval by the Director, a written Closure Plan for the Site four (4) months prior to closure of the Site. This plan must include, as a minimum, a description of the work that will be done to facilitate closure of the Site and a schedule for completion of that work; and,
- (b) Within ten (10) days of closure of the Site, the Company shall notify the District Manager, in writing, that the Site is closed and that the Site Closure Plan has been implemented.

## SCHEDULE "A"

This Schedule "A" forms part of Approval No. 6584-5MSJPK.

1. Application for a Provisional Certificate of Approval for a Waste Disposal Site, dated August 13, 2001, signed by Mr. Kenneth Winter, President, K. Winter Sanitation Inc., and attached supporting documentation .
2. Letter to Mr. K. Winter, President, K. Winter Sanitation Inc., from Mr. M. Keyvani, MOE requesting additional information.
3. Letter from Katherine Rentsch, R.J. Burnside & Associates Limited, to Mr. Keyvani, MOE, the consultant for K. Winter, requesting additional time to submit additional information, and dated January 15, 2003.
4. Letter and its attachment from Ms. Rentsch, R.J. Burnside & Associates Limited, to Mr. Keyvani, MOE, enclosing additional information and dated April 1, 2003.
5. Letter from K. Wassink, MOE to Ms. Rentsch, R.J. Burnside & Associates Limited, requesting additional information and dated April 16, 2003.
6. Letter and attachments from Ms. Rentsch, R.J. Burnside & Associates Limited, to K. Wassink, MOE, enclosing additional information, including MSDS sheets, and a copy of the permit (no. D-135-I-82), from the Simcoe County District Health Unit (dated June 7, 1983), dated May 2, 2003.
7. Copy of letter and attachments from Chris Gerrits, M.Sc., E.I.T. Water Resources, R.J. Burnside & Associates Limited, to K. Winter Sanitation Inc., enclosing Hydrogeological Assessment of Leaching Bed, including: Storage Facility, Adjacent Land Use, Geology, Chemistry, Borehole Logs, Water Quality and Site Diagram, dated October 31, 2003.
8. Copy of facsimile and its attachments from Mr. Alex Campbell, R.J. Burnside & Associates Limited, to Mr. Fred Maefs, MOE Legal Services, enclosing the flow rate to the leaching bed, pump and monitoring information, and the gallons of sewage accumulated for the year 2003, dated November 26, 2003.
9. Report entitled "*K Winter Sanitation: Proposed Monitoring Program for the Leaching Bed Servicing* " prepared for K Winter Sanitation by R.J Burnside & Associates Limited dated June 18, 2004.
10. Letter dated January 20, 2005 to Mr. Ken Winter, K Winter Sanitation Inc. from Mr. Dale I. Gable, Ministry of the Environment requesting additional information on monitoring program report.

11. Letter dated February 22, 2005 to Mr. Dale Gable, Ministry of the Environment from Mr. Alex Campbell, Judan Enterprises providing a response to the January 20, 2005 letter. and providing the additional information requested. Vice President, K. Winter Sanitation Inc. and dated January 25, 2010.
12. Report entitled, "K. Winter Sanitation Inc. - Application to Amend PCofA 6584-5SMJPK", prepared for K. Winter Sanitation by Judan Enterprises and dated December 2009.
13. Email dated February 7, 2013 from Alex Campbell, Judan Enterprises, to Jelena Crnokrak, Ministry of the Environment, regarding decommissioning of on-site leaching bed.
14. Document entitled "Application to Amend Environmental Compliance Approval 6584-5SMJPK", prepared for K. Winter Sanitation by Tekoa Environmental Limited and dated January 22, 2020.
15. Letter from Roger Winter to the Director, MECP, dated June 16, 2020 providing landowner consent to the issuance of an Environmental Compliance Approval to K. Winter Sanitation Inc., including an updated Page 11 of the Application to Amend Environmental Compliance Approval 6584-5SMJPK.

**Schedule "B"**

This Schedule "B" forms part of Approval 6584-5MSJPK.

**B1. Leaching Bed Monitoring Frequency**

The environmental monitoring program shall be conducted on an annual basis.

**B2. Monitor Sampling Locations**

Samples shall be collected from the location listed below. If a monitoring well is dry or damaged then that well does not have to be sampled that sampling event. Static water levels shall be collected in all the groundwater and leachate monitors prior to purging and sampling.

**Table B-1**

Location	Frequency
Pump Tank	Annually
Borehole 1 (Up Gradient)	Annually
Borehole 2 (Up Gradient to Side)	Annually
Borehole 3S (Down Gradient Shallow Aquifer)	Annually
Borehole 3D (Down Gradient Deep Aquifer)	Annually
Roger Winter Well (Up Gradient)	Annually

**B3. Analytical Parameters**

The parameters which shall be measured in the field, along with the chemical and physical laboratory analyses which shall be collected on the groundwater samples from the groundwater and leachate monitors, shall include the following:

**Table B-2**

pH (field)	Conductivity (field)	Conductivity (lab)	Ammonia
pH (lab)	Nitrate	Nitrite	TKN
Sodium	Chloride		

**B4. Groundwater and Leachate Monitor Inspections**

Any groundwater monitoring well found to be damaged, not functioning or otherwise improperly maintained, shall within a reasonable time be properly repaired or replaced. The District Manager shall be notified prior to any well being replaced.

**B5. Groundwater and Leachate Monitoring Protocols**

Standard and/or generally accepted groundwater sampling (including well development, sample collection,

storage and transport) and analytical protocols shall be adhered to during all groundwater monitoring sessions. Groundwater elevation measurements shall be of the static groundwater elevation within the groundwater monitoring well measured prior to well development.

**B6. Method Detection Limits**

All laboratory analyses on groundwater samples should be performed by an accredited analytical laboratory and the detection limits (MDLs) for the specific analyses should commensurate with the standards established in the current Ontario Drinking Water Standards.

**B7. Monitoring Results and Reporting Frequency**

The results of the groundwater and surface water monitoring program shall be reported to the District Manager on an annual basis within the annual report the first of which shall be submitted to the District Manager by March 31, 2005 and every year hereafter.

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

- (1) The reason for the definitions is to simplify the wording of the subsequent Conditions and define the specific meaning of terms as used in this Approval.
- (2) The reason for Conditions (1), (2), (3), (4), (5), (6), (7), (9), (10), (11), (12), (13) and (17) is to clarify the legal rights and responsibilities of the Company.
- (3) The reason for Condition (8) is to ensure that the appropriate Ministry staff have ready access to the operations of the Site which are approved under this Approval. The Condition is supplementary to the powers of entry afforded a Provincial Officer pursuant to the *Environmental Protection Act*, the *Ontario Water Resources Act* and the *Pesticides Act*, as amended.
- (4) The reason for Conditions (14) and (15) is to ensure that the type and volume of waste received, stored and transferred at the Site is in accordance with that approved by this Approval.
- (5) The reason for Condition (18) is to ensure that all operators working at the Site have been trained so that the Site is operated in a safe and environmentally acceptable manner and does not pose a threat to the health and safety of people or the natural environment.
- (6) The reason for Conditions (16), (19), (20), (25), (27), (28) and (29) is to ensure that the Site is operated in a manner which does not result in a nuisance or a hazard to the health and safety of people or the environment.
- (7) The reason for imposing Conditions (21), (22) and (23) is to include the monitoring program into the Approval. This is to ensure the long-term health and safety of the public and the environment.
- (8) The reason that Condition (24) is to ensure drawings of the tanks are kept onsite at all times.
- (9) The reason for Condition (26) is to ensure that staff promptly report spills and to minimize the possibility of off-site impacts and to ensure staff deal promptly and effectively with any spills that do occur.
- (10) The reason for Condition (30) is to maintain an annual record of the Site operation and a summary of the quantities and types of the Hauled Sewage handled at the Site.
- (11) The reason for Condition (31) is to ensure that if for any reason the Company should cease operations or abandon the Site sufficient funds will be available for the Site to be closed down and the Hauled Sewage disposed of in an acceptable manner.
- (12) The reason for Condition (32) is to ensure that the Site is closed in accordance with Ministry

standards and to protect the health and safety of the public and the environment.

**Upon issuance of the environmental compliance approval, I hereby revoke Approval No(s).  
6584-5MSJPK issued on July 8, 2003**

*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](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 22nd day of June, 2020



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

IP/

c: District Manager, MECP Barrie  
Alex Campbell, Tekoa Environmental Limited