

AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 0246-BQMK4F
Issue Date: July 22, 2020

A.G. Simpson Automotive Inc.
200 Yorkland Boulevard, No. 800
Toronto, Ontario
M2J 5C1

Site Location: 275 Eugenie Street
Windsor City, County of Essex

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 stamped and welded parts for the automotive industry, consisting of the following operations/equipment;

- one (1) exhaust system (source S-8), serving one MIG welding cell, operating at the maximum usage rate of 2.0 kilograms per day of Super MIG 70 wires, venting into the atmosphere at a nominal volumetric rate of 1.89 actual cubic metres per second through a stack, having an exit diameter of 0.61 metre, extending 0.41 metre above the roof and 6.26 metres above grade;
- one (1) exhaust system (source S-10), serving one MIG welding cell consisting of two robotic welders, operating at the maximum usage rate of 68.3 kilograms per day of Super MIG 70 wires, venting into the atmosphere at a nominal volumetric rate of 3.4 actual cubic metres per second through a stack, having an exit diameter of 0.46 metre, extending 3.66 metres above the roof and 8.51 metres above grade;
- one (1) exhaust system (source S-12), serving one MIG welding cell, operating at the maximum usage rate of 33.6 kilograms per day of Super MIG 70 wires, venting into the atmosphere at a nominal volumetric rate of 1.2 actual cubic metres per second through a stack, having an exit diameter of 0.46 metre, extending 2.86 metres above the roof and 10.5 metres above grade;

- one (1) exhaust system (source S-19), serving spot welding operations (maximum 17,460 spot welds per day) and a MIG projection welding cell operating at the maximum usage rate of 18.1 kilograms per day of Super MIG 70 wires and 3,024 projection welds per day, venting into the atmosphere at a nominal volumetric rate of 1.89 actual cubic metres per second through a stack, having an exit diameter of 0.51 metre, extending 1.7 metres above the roof and 13.3 metres above grade;
- one (1) exhaust system (source S-20), serving three projection welders, operating at the maximum production rate of 48,000 projection welds per day, venting into the atmosphere at a nominal volumetric rate of 1.42 actual cubic metres per second through a stack, having an exit diameter of 0.33 metre, extending 3.05 metres above the roof and 10.65 metres above grade;
- one (1) exhaust system (source S-39), serving two laser welding cells, operating at the maximum welding rate of 2,560 parts per day, venting into the atmosphere at a nominal volumetric rate of 1.45 actual cubic metres per second through a stack, having an exit diameter of 0.52 metre, extending 3.09 metres above the roof and 12.2 metres above grade;
- one (1) exhaust system (source S-42), serving two MIG welding cells, operating at the maximum usage rate of 32.0 kilograms per day of Super MIG 70 wires, venting into the atmosphere at a nominal volumetric rate of 3.41 actual cubic metres per second through a stack, having an exit diameter of 0.53 metre, extending 4.82 metres above the roof and 12.12 metres above grade;
- one (1) natural gas fired boiler (source S-35, die boiler), having a maximum thermal input of 416,725 kilojoules per hour, discharging into the atmosphere through a stack, having an exit diameter of 0.20 metre, extending 1.0 metre above the roof and 8.3 metres above the grade;
- one (1) natural gas fired heat treat oven (source S-38), having a maximum thermal input of 506,400 kilojoules per hour, discharging into the atmosphere through a stack, having an exit diameter of 0.2 metre, extending 0.91 metre above the roof and 6.41 metres above the grade;
- one (1) exhaust system (source S-43) serving a hydrogen sulfide treatment system, equipped with two treatment vessels in series (149.5 kilograms of activated alumina vessel and 90.7 kilograms of air purification carbon vessel) and hydrogen sulfide monitoring system, discharging back to the plant air through a stack, having an exit diameter of 0.05 metre;

all in accordance with the Application for Approval (Air & Noise) submitted by A.G. Simpson Automotive Inc. dated November 29, 2019, signed by Lisa Boulton, General Counsel & Business Development, the letter from Cardinal Environmental Consulting Services Ltd. dated June 3, 2020 and signed by Stewart McLellan, President C.E.T., the Acoustic Assessment Report prepared by Stewart J. McLellan / Cardinal Environmental Consulting Services Ltd. and dated November 2019, and all other supporting information associated with the application.

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

1. "*Acoustic Assessment Report*" means the report, prepared in accordance with *Publication NPC-233* and Appendix A of the Basic Comprehensive User Guide, by Stewart J. McLellan / Cardinal Environmental Consulting Services Ltd. and dated November 2019, submitted in support of the application, that documents all sources of noise emissions and *Noise Control Measures* present at the *Facility*, as updated in accordance with Condition 5 of this *Approval*;
2. "*Approval*" means this Environmental Compliance Approval, including the application and supporting documentation listed above;
3. "*Company*" means A.G. Simpson Automotive Inc. that is responsible for the construction or operation of the *Facility* and includes any successors and assigns;
4. "*District Manager*" means the District Manager of the appropriate local district office of the *Ministry*, where the *Facility* is geographically located;
5. "*EPA*" means the Environmental Protection Act, R.S.O. 1990, c.E.19, as amended;
6. "*Equipment*" means the equipment described in the *Company* 's application, this *Approval* and in the supporting documentation submitted with the application, to the extent approved by this *Approval*;
7. "*Exhausted* " means the capacity of the activated alumina or air purification carbon to adsorb emissions is reached and the adsorption media is no longer able to effectively reduce emissions;
8. "*Facility*" means the entire operation located on the property where the *Equipment* is located;
9. "*Manual*" means a document or a set of documents that provide written instructions to staff of the *Company*;
10. "*Ministry*" means the ministry of the government of Ontario responsible for the *EPA* and includes all officials, employees or other persons acting on its behalf;
11. "*Noise Control Measures*" means measures to reduce the noise emission from the *Facility* and/or *Equipment* including, but not limited to silencers, acoustic louvers, enclosures, absorptive treatment, plenums and barriers;
12. "*Publication NPC-207*" means the *Ministry* draft technical publication "Impulse Vibration in Residential Buildings", November 1983, supplementing the Model Municipal Noise Control By-Law, Final Report, published by the *Ministry*, August 1978, as amended;
13. "*Publication NPC-233*" means the *Ministry* Publication NPC-233, "Information to be Submitted for Approval of Stationary Sources of Sound", October, 1995, as amended;

14. "*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.

You are hereby notified that this environmental compliance approval is issued to you subject to the terms and conditions outlined below:

TERMS AND CONDITIONS

1. OPERATION AND MAINTENANCE

1. The *Company* shall ensure that the *Equipment* is properly operated and maintained at all times. The *Company* shall:
 - a. prepare, not later than three (3) months after the date of this *Approval*, and update, as necessary, a *Manual* outlining the operating procedures and a maintenance program for the *Equipment*, including:
 - i. routine operating and maintenance procedures in accordance with good engineering practices and as recommended by the *Equipment* suppliers;
 - ii. emergency procedures, including spill clean-up procedures;
 - iii. procedures for any record keeping activities relating to operation and maintenance of the *Equipment*;
 - iv. all appropriate measures to minimize noise and odorous emissions from all potential sources; and
 - b. implement the recommendations of the *Manual*.
2. The *Company* shall ensure that the activated alumina or air purification carbon in the hydrogen sulphide treatment system is replaced before it is *Exhausted*.

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 restrict the operations of the *Facility* to the period of 7:00 AM to 11:00 PM.
- 2. The *Company* shall ensure that the vibration emissions from the *Facility* comply with the limits set in *Ministry Publication NPC-207*.
- 3. The *Company* shall:
 - a. implement by not later than one (1) month from the date of this *Approval*, the *Noise Control Measures* as outlined in the *Acoustic Assessment Report*.
 - b. ensure, subsequent to the implementation of the *Noise Control Measures* that the noise emissions from the *Facility* comply with the limits set in *Ministry Publication NPC-300*; and
 - c. ensure that the *Noise Control Measures* are properly maintained and continue to provide the acoustical performance outlined in the *Acoustic Assessment Report*.

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. Condition No. 4 is 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). 1852-59PH79 issued on March 28, 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

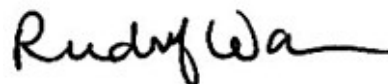
The Director appointed for the purposes of
Part II.1 of the Environmental Protection Act
Ministry of the Environment,
Conservation and Parks
135 St. Clair Avenue West, 1st Floor
Toronto, Ontario
M4V 1P5

*** 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**

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 July, 2020



Rudolf Wan, P.Eng.

Director

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

JK/

c: Area Manager, MECP Windsor Area Office

c: District Manager, MECP Sarnia District Office

Stewart McLellan, Cardinal Environmental Consulting Services Ltd.