

ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 7460-BP3M9N
Issue Date: September 24, 2020

NORPROP Limited
35 Roundel Road
North Bay, Ontario
P1C 0B8

Site Location: 35 Roundel Road
North Bay City, District of Nipissing
P1C 0B8

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:

Description Section

A zinc galvanizing facility, consisting of the following processes and support units:

- Pre-treatment processes consisting of degreasing, rinsing, pickling and fluxing tanks;
- Galvanizing;
- Quenching and passivation operation;

including the *Equipment* and any other ancillary and support processes and activities, operating at a *Facility Production Limit* of up to 30,000 tonnes of galvanized products per year discharging to the air as described in the *Original ESDM Report*.

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

1. "*ACB list*" means the document entitled "Air Contaminants Benchmarks (ACB) List: Standards, guidelines and screening levels for assessing point of impingement concentrations of air contaminants", as amended from time to time and published by the *Ministry* and available on a Government website;

2. "*Acceptable Point of Impingement Concentration*" means a concentration accepted by the *Ministry* as not likely to cause an adverse effect for a *Compound of Concern* that,
 - a. is not identified in the *ACB list*, or
 - b. is identified in the *ACB list* as belonging to the category "Benchmark 2" and has a concentration at a *Point of Impingement* that exceeds the concentration set out for the contaminant in that document. With respect to the *Original ESDM Report*, the *Acceptable Point of Impingement Concentration* for a *Compound of Concern* mentioned above is the concentration set out in the *Original ESDM Report*;
3. "*Acoustic Assessment Report*" means the report, prepared in accordance with *Publication NPC-233* and Appendix A of the *Basic Comprehensive User Guide*, by Matthew Griffin, GHD and dated April 21, 2020, 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*;
4. "*Acoustic Assessment Summary Table*" means a table prepared in accordance with the *Basic Comprehensive User Guide* summarising the results of the *Acoustic Assessment Report*, as updated in accordance with Condition 5 of this *Approval*;
5. "*Acoustic Audit*" means an investigative procedure consisting of measurements and/or acoustic modelling of all sources of noise emissions due to the operation of the *Facility* assessed to determine compliance with the Performance Limits for the *Facility* regarding noise emissions, completed in accordance with the procedures set in *Publication NPC-103* and reported in accordance with *Publication NPC-233*;
6. "*Acoustic Audit Report*" means a report presenting the results of an *Acoustic Audit*, prepared in accordance with *Publication NPC-233*;
7. "*Acoustical Consultant*" means a person currently active in the field of environmental acoustics and noise/vibration control, who is familiar with *Ministry* noise guidelines and procedures and has a combination of formal university education, training and experience necessary to assess noise emissions from a *Facility*;
8. "*Approval*" means this entire Environmental Compliance Approval and any *Schedules* to it;
9. "*Basic Comprehensive User Guide*" means the *Ministry* document titled "Basic Comprehensive Certificates of Approval (Air) User Guide" dated March 2011, as amended;
10. "*Company*" means NORPROP Limited that is responsible for the construction or operation of the *Facility* and includes any successors and assigns in accordance with section 19 of the *EPA*;

11. "*Compound of Concern*" means a contaminant described in paragraph 4 subsection 26 (1) of *O. Reg. 419/05*, namely, a contaminant that is discharged from the *Facility* in an amount that is not negligible;
12. "*Date of Commencement*" means the date on which metal is first galvanized at the *Facility*;
13. "*Description Section*" means the section on page one of this *Approval* describing the *Company's* operations and the *Equipment* located at the *Facility* and specifying the *Facility Production Limit* for the *Facility*;
14. "*Director*" means a person appointed for the purpose of section 20.3 of the *EPA* by the *Minister* pursuant to section 5 of the *EPA*;
15. "*District Manager*" means the District Manager of the appropriate local district office of the *Ministry*, where the *Facility* is geographically located;
16. "*Emission Summary Table*" means a table described in paragraph 14 of subsection 26 (1) of *O. Reg. 419/05*;
17. "*Environmental Assessment Act*" means the Environmental Assessment Act, R.S.O. 1990, c.E.18, as amended;
18. "*EPA*" means the Environmental Protection Act, R.S.O. 1990, c.E.19, as amended;
19. "*Equipment*" means equipment or processes described in the *ESDM Report*, the *Acoustic Assessment Report*, this *Approval* and in the *Schedules* referred to herein and any other equipment or processes;
20. "*Equipment with Specific Operational Limits*" means any *Equipment* related to the thermal oxidation of waste or waste derived fuels, fume incinerators or any other *Equipment* that is specifically referenced in any published *Ministry* document that outlines specific operational guidance that must be considered by the *Director* in issuing an *Approval*;
21. "*ESDM Report*" means the most current Emission Summary and Dispersion Modelling Report that describes the *Facility*. The *ESDM Report* is based on the *Original ESDM Report* and is updated after the issuance of this *Approval* in accordance with section 26 of *O. Reg. 419/05* and the *Procedure Document*;
22. "*Facility*" means the entire operation located on the property where the *Equipment* is located;
23. "*Facility Production Limit*" means the production limit placed by the *Director* on the main product(s) or raw materials used by the *Facility*;

24. "*Independent Acoustical Consultant*" means an *Acoustical Consultant* not representing the *Company*, and not involved in the noise impact assessment or the design/implementation of *Noise Control Measures* for the *Facility/Equipment*. The *Independent Acoustical Consultant* shall not be retained by the consultant involved in the noise/vibration impact assessment or the design/implementation of noise/vibration control measures for the *Facility/Equipment*;
25. "*Log*" means a document that contains a record of each change that is required to be made to the *ESDM Report* and *Acoustic Assessment Report*, including the date on which the change occurred. For example, a record would have to be made of a more accurate emission rate for a source of contaminant, more accurate meteorological data, a more accurate value of a parameter that is related to a source of contaminant, a change to a *Point of Impingement* and all changes to information associated with a *Modification* to the *Facility* that satisfies Condition 2;
26. "*Manager*" means the Manager, Technology Standards Section, Technical Assessment and Standards Development Branch, or any other person who represents and carries out the duties of the Manager, Technology Standards Section, Technical Assessment and Standards Development Branch, as those duties relate to the conditions of this *Approval*;
27. "*Minister*" means the Minister of the Environment, Conservation and Parks or such other member of the Executive Council as may be assigned the administration of the *EPA* under the Executive Council Act;
28. "*Ministry*" means the ministry of the *Minister*;
29. "*Modification*" means any construction, alteration, extension or replacement of any plant, structure, equipment, apparatus, mechanism or thing, or alteration of a process or rate of production at the *Facility* that may discharge or alter the rate or manner of discharge of a *Compound of Concern* to the air or discharge or alter noise or vibration emissions from the *Facility*;
30. "*Noise Control Measures*" means measures to reduce the noise emissions from the *Facility* and/or *Equipment* including, but not limited to, silencers, acoustic louvers, enclosures, absorptive treatment, plenums and barriers; It also means the *Noise Control Measures* detailed in the *Acoustic Assessment Report* prepared by GHD, dated April 21, 2020, and signed by Matthew Griffin;
31. "*O. Reg. 419/05*" means Ontario Regulation 419/05, Air Pollution – Local Air Quality, as amended;
32. "*Original ESDM Report*" means the Emission Summary and Dispersion Modelling Report which was prepared in accordance with section 26 of *O. Reg. 419/05* and the *Procedure Document* by Matthew Griffin, GHD Limited and dated May 21, 2020 submitted in support of the application, and includes any changes to the report made up to the date of issuance of this *Approval*;
33. "*Point of Impingement*" has the same meaning as in section 2 of *O. Reg. 419/05*;
34. "*Point of Reception*" means Point of Reception as defined by *Publication NPC-300*;

35. "*Pre-Test Plan*" means a plan for the *Source Testing* including the information required in Section 5 of the *Source Testing Code*;
36. "*Procedure Document*" means *Ministry* guidance document titled "Procedure for Preparing an Emission Summary and Dispersion Modelling Report" dated February 2017, as amended;
37. "*Processes with Significant Environmental Aspects*" means the *Equipment* which, during regular operation, would discharge one or more contaminants into the air in an amount which is not considered as negligible in accordance with section 26 (1) 4 of *O. Reg. 419/05* and the *Procedure Document*;
38. "*Properties*" means the vacant lands to the south of the *Facility* zoned as "Institutional Zone (ISZ)", identified as POR5 and POR7, which may allow the development of the future buildings containing noise sensitive spaces;
39. "*Publication NPC-103*" means Publication NPC-103, Procedures, August 1978;
40. "*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;
41. "*Publication NPC-233*" means the *Ministry* Publication NPC-233, "Information to be Submitted for Approval of Stationary Sources of Sound", October, 1995, as amended;
42. "*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;
43. "*Schedules*" means the following schedules attached to this *Approval* and forming part of this *Approval* namely:
- Schedule A - Supporting Documentation
 - Schedule B - *Noise Control Measures*;
 - Schedule C - Noise Tables;
 - Schedule D - *Source Testing* Procedure; and
 - Schedule E - *Targeted Sources* and *Test Contaminants*
44. "*Source Testing*" means sampling and testing to measure emissions resulting from operating the *Targeted Sources* under conditions which yield the worst case emissions within the approved operating range of the *Targeted Sources* which satisfies paragraph 1 of subsection 11(1) of *O. Reg. 419/05*;
45. "*Source Testing Code*" means the Ontario Source Testing Code, dated June 2010, prepared by the *Ministry*, as amended;

46. "*Targeted Sources*" means the sources listed in Schedule E of this *Approval*;
47. "*Test Contaminants*" means the contaminants listed in Schedule E of this *Approval*;
48. "*Toxicologist*" means a qualified professional currently active in the field of risk assessment and toxicology that has a combination of formal university education, training and experience necessary to assess contaminants;
49. "*Trucks*" means acid truck(s) and material shipping/receiving truck(s); and
50. "*Written Summary Form*" means the electronic questionnaire form, available on the *Ministry* website, and supporting documentation, that documents the activities undertaken at the *Facility* in the previous calendar year.

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

1. Except as otherwise provided by this *Approval*, the *Facility* shall be designed, developed, built, operated and maintained in accordance with the terms and conditions of this *Approval* and in accordance with the following *Schedules* attached hereto:
 - Schedule A - Supporting Documentation
 - Schedule B - *Noise Control Measures*
 - Schedule C - Noise Tables;
 - Schedule D - *Source Testing* Procedure; and
 - Schedule E - *Targeted Sources* and *Test Contaminants*

2. LIMITED OPERATIONAL FLEXIBILITY

1. Pursuant to section 20.6 (1) of the *EPA* and subject to Conditions 2.2 and 2.3 of this *Approval*, future construction, alterations, extensions or replacements are approved in this *Approval* if the future construction, alterations, extensions or replacements are *Modifications* to the *Facility* that:
 - a. are within the scope of the operations of the *Facility* as described in the *Description Section* of this *Approval*;
 - b. do not result in an increase of the *Facility Production Limit* above the level specified in the *Description Section* of this *Approval*; and

- c. result in compliance with the performance limits as specified in Condition 4.
2. Condition 2.1 does not apply to,
 - a. the addition of any new *Equipment with Specific Operational Limits* or to the *Modification* of any existing *Equipment with Specific Operational Limits* at the *Facility*; and
 - b. *Modifications* to the *Facility* that would be subject to the *Environmental Assessment Act*.
3. Condition 2.1 of this *Approval* shall expire ten (10) years from the date of this *Approval*, unless this *Approval* is revoked prior to the expiry date. The *Company* may apply for renewal of Condition 2.1 of this *Approval* by including an *ESDM Report* and an *Acoustic Assessment Report* that describes the *Facility* as of the date of the renewal application.

3. REQUIREMENT TO REQUEST AN ACCEPTABLE POINT OF IMPINGEMENT CONCENTRATION

1. Prior to making a *Modification* to the *Facility* that satisfies Condition 2.1.a. and 2.1.b., the *Company* shall prepare a proposed update to the *ESDM Report* to reflect the proposed *Modification*.
2. The *Company* shall request approval of an *Acceptable Point of Impingement Concentration* for a *Compound of Concern* if the *Compound of Concern* is not identified in the *ACB list* as belonging to the category “Benchmark 1” and a proposed update to an *ESDM Report* indicates that one of the following changes with respect to the concentration of the *Compound of Concern* may occur:
 - a. The *Compound of Concern* was not a *Compound of Concern* in the previous version of the *ESDM Report* and
 - i. the concentration of the *Compound of Concern* exceeds the concentration set out for the contaminant in the *ACB list*; or
 - ii. the *Compound of Concern* is not identified in the *ACB list*; or
 - b. The concentration of the *Compound of Concern* in the updated *ESDM Report* exceeds the higher of,
 - i. the most recent *Acceptable Point of Impingement Concentration*, and
 - ii. the concentration set out for the contaminant in the *ACB list*, if the contaminant is identified in that document.

3. The request required by Condition 3.2 shall propose a concentration for the *Compound of Concern* and shall contain an assessment, performed by a *Toxicologist*, of the likelihood of the proposed concentration causing an adverse effect at *Points of Impingement*.
4. If the request required by Condition 3.2 is a result of a proposed *Modification* described in Condition 3.1, the *Company* shall submit the request, in writing, to the *Director* at least 30 days prior to commencing to make the *Modification*. The *Director* shall provide written confirmation of receipt of this request to the *Company*.
5. If a request is required to be made under Condition 3.2 in respect of a proposed *Modification* described in Condition 3.1, the *Company* shall not make the *Modification* mentioned in Condition 3.1 unless the request is approved in writing by the *Director*.
6. If the *Director* notifies the *Company* in writing that the *Director* does not approve the request, the *Company* shall,
 - a. revise and resubmit the request; or
 - b. notify the *Director* that it will not be making the *Modification*.
7. The re-submission mentioned in Condition 3.6 shall be deemed a new submission under Condition 3.2.
8. If the *Director* approves the request, the *Company* shall update the *ESDM Report* to reflect the *Modification*.
9. Condition 3 does not apply if Condition 2.1 has expired.

4. PERFORMANCE LIMITS

1. Subject to Condition 4.2, the *Company* shall not discharge or cause or permit the discharge of a *Compound of Concern* into the air if,
 - a. the *Compound of Concern* is identified in the *ACB list* as belonging to the category "Benchmark 1" and the discharge results in the concentration at a *Point of Impingement* exceeding the Benchmark 1 concentration; or
 - b. the *Compound of Concern* is not identified in the *ACB list* as belonging to the category "Benchmark 1" and the discharge results in the concentration at a *Point of Impingement* exceeding the higher of,
 - i. if an *Acceptable Point of Impingement Concentration* exists, the most recent *Acceptable Point of Impingement Concentration*, and

- ii. the concentration set out for the contaminant in the *ACB list*, if the contaminant is identified in that document.
- 2. Condition 4.1 does not apply if the benchmark set out in the *ACB list* has a 10-minute averaging period and no ambient monitor indicates an exceedance at a *Point of Impingement* where human activities regularly occur at a time when those activities regularly occur.
- 3. The *Company* shall:
 - a. implement the *Noise Control Measures*, as outlined in the *Acoustic Assessment Report* and Schedule B of this *Approval*;
 - b. ensure that the noise emissions from the *Facility* comply with the limits set out in *Ministry Publication NPC-300*;
 - c. ensure at all times that the following noise sources' sound power/sound pressure levels do not exceed the following values:
 - i. Pretreatment Process Exhaust (S1):
 - A. the maximum sound power level of 93 dBA, including 5 dB tonal penalty; and
 - B. the maximum sound pressure level of 73 dBA at a distance of 3 metres; including 5 dB tonal penalty; and
 - ii. Zinc Dust Collector Exhaust (S3):
 - A. the maximum sound power level of 96 dBA, including 5 dB tonal penalty;
 - B. the maximum sound pressure level of 76 dBA at a distance of 3 metres; including 5 dB tonal penalty;
 - d. ensure that any and all *Trucks* arrive at and depart from the *Facility* in accordance with the following:
 - i. limit *Trucks* arrivals and departures during the hours from 7 a.m. to 11 p.m., in accordance with the following:
 - A. a maximum of fifteen (15) material shipping/receiving trucks per sixty (60) minute period; and
 - B. a maximum of one (1) acid tanker truck per sixty (60) minute period.
 - ii. limit *Trucks* arrivals and departures during the night-time hours from 11 p.m. to 7 a.m., in accordance with the following:
 - A. a maximum of eight (8) material shipping/receiving trucks per sixty (60) minute period; and

- B. a maximum of one (1) acid tanker truck per sixty (60) minute period.
- iii. ensure that the forklifts operations are restricted to the eastern part of the *Facility* property, and limit forklift trips in accordance with the following:
 - A. a maximum of one hundred fifty (150) forklift trips per sixty (60) minute period during the hours from 7 a.m. to 11 p.m; and
 - B. a maximum of eighty (80) forklift trips per sixty (60) minute period during the night-time hours from 11 p.m. to 7 a.m.
- e. ensure that all bay doors remain fully closed at all times, with the exception of acid trucks and the forklifts entering/exiting the *Facility* while loading/unloading material shipping/receiving trucks;
- f. implement and maintain:
 - i. no idling policy for the forklifts and all the *Trucks* at the *Facility* property, with the exception of the short duration truck idling on the weigh scale;
 - ii. a forklift driver training program, in which the drivers are instructed to drive in a careful manner and with full consideration of the related noise issues at the *Facility*; and
 - iii. policy to regularly maintain the asphalt surface at the *Facility* property, such that uneven driving surfaces (potholes) will be minimized.
- g. ensure that the acid truck unloading operation, using the *Facility* stand-by blower, is conducted in the receiving bay at the south-west corner of the *Facility* building, with the insulated bay door fully closed;
- h. enforce an on-site speed limit of 10 km/hr at the *Facility* property; and
- i. ensure that the *Noise Control Measures* are properly maintained and continue to provide the acoustical performances outlined in the *Acoustic Assessment Report*.
- 4. The *Company* shall ensure that the vibration emissions from the *Facility* comply with the limits set out in *Ministry Publication NPC-207*.
- 5. The *Company* shall operate any *Equipment with Specific Operational Limits* approved by this *Approval* in accordance with the *Original ESDM Report*.

5. DOCUMENTATION REQUIREMENTS

1. The *Company* shall maintain an up-to-date *Log*.

2. No later than March 31 in each year, the *Company* shall update the *Acoustic Assessment Report* and shall update the *ESDM Report* in accordance with section 26 of *O. Reg. 419/05* so that the information in the reports is accurate as of December 31 in the previous year.
3. The *Company* shall make the *Emission Summary Table* (see section 27 of *O. Reg. 419/05*) and *Acoustic Assessment Summary Table* available for examination by any person, without charge, by posting it on the Internet or by making it available during regular business hours at the *Facility*.
4. The *Company* shall, within three (3) months after the expiry of Condition 2.1 of this *Approval*, update the *ESDM Report* and the *Acoustic Assessment Report* such that the information in the reports is accurate as of the date that Condition 2.1 of this *Approval* expired.
5. Conditions 5.1 and 5.2 do not apply if Condition 2.1 has expired.

6. REPORTING REQUIREMENTS

1. Subject to Condition 6.2, the *Company* shall provide the *Director* no later than June 30 of each year, a *Written Summary Form* to be submitted through the *Ministry's* website that shall include the following:
 - a. a declaration of whether the *Facility* was in compliance with section 9 of the *EPA, O. Reg. 419/05* and the conditions of this *Approval*;
 - b. a summary of each *Modification* satisfying Condition 2.1.a. and 2.1.b. that took place in the previous calendar year that resulted in a change in the previously calculated concentration at a *Point of Impingement* for any *Compound of Concern* or resulted in a change in the sound levels reported in the *Acoustic Assessment Summary Table* at any *Point of Reception*.
2. Condition 6.1 does not apply if Condition 2.1 has expired.

7. OPERATION AND MAINTENANCE

1. The *Company* shall prepare and implement, not later than six (6) months from the *Date of Commencement* of operations of the *Facility*, written operating procedures and maintenance programs for all *Processes with Significant Environmental Aspects*, which shall specify as a minimum:
 - a. frequency of inspections and scheduled preventative maintenance including but not limited to the encapsulated pre-treatment and fume extraction, packed bed scrubber, galvanizing keettle including the fume enclosure and baghouse, acid handling and storage and raw material/waste handling and storage;

- b. procedures for the operation and maintenance of the processes including but not limited to pre-treatment processes including fumes extraction and packed bed scrubber, the galvanization process including the fume enclosure and baghouse, acid handling and storage and raw material/waste handling and storage;
 - c. procedures to prevent upset conditions;
 - d. emergency procedures including spill clean-up procedures;
 - e. procedures to minimize all fugitive emissions from processes including but not limited to pre-treatment, galvanization, acid handling and storage, raw material/waste handling and storage, facility roads and open areas;
 - f. procedures to prevent and/or minimize odorous emissions;
 - g. procedures to prevent and/or minimize noise emissions; and
 - h. procedures for record keeping activities relating to the operation and maintenance programs.
2. The *Company* shall ensure that all *Processes with Significant Environmental Aspects* are operated and maintained in accordance with this *Approval*, the operating procedures and maintenance programs.
3. The *Company* shall ensure that:
- a. the pre-treatment operations including degreasing, rinsing, pickling and fluxing are conducted in an encapsulated area maintained under negative pressure at all times such that the air emissions from these operations are extracted and treated in the packed bed scrubber before discharge to air;
 - b. the galvanizing hot dip operations are conducted only with an operating fume enclosure system maintained under negative pressure where all air emissions from the hot dip operations are collected, extracted and filtered through the baghouse dust collector before discharge to air;
 - c. fugitive emissions from the passivation (finishing) operation are extracted and controlled by the pre-treatment area packed bed scrubber before discharge to air;
 - d. acid fumes from acid tanks during tank loading operation are collected and vented to the unloading acid delivery truck for disposal off-site;
 - e. employees at all levels receive training and instructions necessary for conducting their duties including but not limited to the following:

- i. responsibilities under the operation and maintenance programs required under this *Approval*;
 - ii. minimization of emissions under all operating conditions including start-up and shut-down; and
 - iii. actions during upset conditions and/or emergency conditions which may lead to emissions.
- f. The following records are maintained:
- i. daily, monthly and annual galvanized metal throughput in tonnes;
 - ii. monthly and annual zinc usage in tonnes;
 - iii. monthly acid recharge rate;
 - iv. inspections, preventative maintenance, scheduled maintenance and repairs performed on any air pollution abatement equipment or system;
 - v. malfunctions of any air pollution abatement equipment or system and details of corrective action performed.

8. COMPLAINTS RECORDING AND REPORTING

1. If at any time, the *Company* receives an environmental complaint from the public regarding the operation of the *Equipment* approved by this *Approval*, the *Company* shall take the following steps:
 - a. Record and number each complaint, either electronically or in a log book. The record shall include the following information: the time and date of the complaint and incident to which the complaint relates, the nature of the complaint, wind direction at the time and date of the incident to which the complaint relates and, if known, the address of the complainant.
 - b. Notify the *District Manager* of the complaint within two (2) business days after the complaint is received, or in a manner acceptable to the *District Manager*.
 - c. Initiate appropriate steps to determine all possible causes of the complaint, and take the necessary actions to appropriately deal with the cause of the subject matter of the complaint.
 - d. Complete and retain on-site a report written within one (1) week of the complaint date. The report shall list the actions taken to appropriately deal with the cause of the complaint and set out steps to be taken to avoid the recurrence of similar incidents.

9. RECORD KEEPING REQUIREMENTS

1. Any information requested by any employee in or agent of the *Ministry* concerning the *Facility* and its operation under this *Approval*, including, but not limited to, any records required to be kept by this *Approval*, shall be provided to the employee in or agent of the *Ministry*, upon request, in a timely manner.
2. Unless otherwise specified in this *Approval*, the *Company* shall retain, for a minimum of five (5) years from the date of their creation all reports, records and information described in this *Approval*, including,
 - a. a copy of the *Original ESDM Report* and each updated version;
 - b. a copy of each version of the *Acoustic Assessment Report*;
 - c. supporting information used in the emission rate calculations performed in the *ESDM Reports* and *Acoustic Assessment Reports*;
 - d. the records in the *Log*;
 - e. copies of each *Written Summary Form* provided to the *Ministry* under Condition 6.1 of this *Approval*;
 - f. records of maintenance, repair and inspection of *Equipment* related to all *Processes with Significant Environmental Aspects*;
 - g. all records related to the operation and maintenance required by Condition 7 of this *Approval*;
 - h. all records related to environmental complaints made by the public as required by Condition 8 of this *Approval*;
 - i. all records related to *Source Testing* under Condition 10 of this *Approval*.

10. SOURCE TESTING

1. The *Company* shall perform *Source Testing* in accordance with the procedures in Schedule D to determine the rates of emissions of the *Test Contaminants* from the *Targeted Sources* listed in Schedule E.
2. *Source Testing* shall be carried out at the maximum production capacity of the pre-treatment operation including degreasing, rinsing, pickling and fluxing, and the galvanizing operation, characterized by a maximum of five (5) galvanizing tank dips per hour, targeting parts providing the maximum metal surface exposure for galvanizing.

3. *Source Testing* shall be performed within nine (9) months of the *Date of Commencement* of operation of the *Facility*, or within a period as directed or agreed to in writing by the *District Manager*.
4. The *Company* shall in writing, inform the *Date of Commencement* of operation of the *Facility* to the *District Manager* within two (2) weeks of the *Date of Commencement* of operation of the *Facility*.

11. ACOUSTIC AUDIT

1. The *Company* shall carry out *Acoustic Audit* measurements on the actual noise emissions due to the operation of the *Facility*. The *Company*:
 - a. shall carry out *Acoustic Audit* measurements in accordance with the procedures in *Publication NPC-103*;
 - b. shall submit an *Acoustic Audit Report* on the results of the *Acoustic Audit*, prepared by an *Independent Acoustical Consultant*, in accordance with the requirements of *Publication NPC-233*, to the *District Manager* and the *Director*, not later than six (6) months after *Date of Commencement* of operation of the *Facility*.
2. The *Director*:
 1. may not accept the results of the *Acoustic Audit* if the requirements of *Publication NPC-233* were not followed; and
 2. may require the *Company* to repeat the *Acoustic Audit* if the results of the *Acoustic Audit* are found unacceptable to the *Director*.

12. REVOCATION OF PREVIOUS APPROVALS

1. This *Approval* replaces and revokes all Certificates of Approval (Air) issued under section 9 *EPA* and Environmental Compliance Approvals issued under Part II.1 *EPA* to the *Facility* in regards to the activities mentioned in subsection 9(1) of the *EPA* and dated prior to the date of this *Approval*.

SCHEDULE A

Supporting Documentation

1. Environmental Compliance Approval Application, dated August 21, 2019, signed by Andre Van Soelen and submitted by the *Company*;
2. Emission Summary and Dispersion Modelling Report, prepared by Matthew Griffin, GHD Limited and dated May 21, 2020;
3. Additional air emission and dispersion modelling data provided via emails dated February 26, 2020; April 2, 2020; May 21, 2020; August 17, 2020 and August 21, 2020 by Matthew Griffin, GHD Limited;
4. *Acoustic Assessment Report*, prepared by Matthew Griffin, GHD and dated April 21, 2020;
5. The letters (e-mails) dated October 2, 15 and 25, 2019, November 26, 2019, January 13, 22 and 23, 2020, March 5, 2020, April 1, 14, 22 and 29, 2020, all provided by Ervin Ivens, Matthew Griffin and Michael Masschaele, GHD.

SCHEDULE B

Noise Control Measures

1. Acid truck unloading area (S10) with the stand-by blower and the insulated bay door

1. Installation of the stand-by blower for the acid truck unloading

The *Company* shall install a stand-by blower for the acid truck unloading, having a maximum overall sound pressure level of 80 dBA at 1 metre, including 5 dB tonal penalty. The stand-by blower shall also have the overall maximum sound power level of 91 dBA, including 5 dB tonal penalty, and the following acoustical performance specifications in terms of the maximum sound power levels (dB) as shown in Table 1 from Schedule C.

2. Installation of the insulated bay door for the acid truck unloading area

The *Company* shall install the insulated bay door for the area of the acid truck unloading. The bay door shall be located at the south-west corner of the building and face to the south. The insulated bay door shall have at least the following minimum acoustical performance specifications in terms of the sound transmission loss values as shown in Table 2 from Schedule C.

The *Company* shall implement the above *Noise Control Measures* prior to *Date of Commencement of operation of the Facility*.

2. Southern Berm/Barrier

Future receptors to the south (identified as POR5 and POR7) should be shielded from the *Trucks* noise impacts by the berm or barrier, or the combination of both. The berm/barrier shall have a minimum height of 6 metres and a minimum length of 160 metres, and be located along as depicted in Figure 5 of the *Acoustic Assessment Report*. The berm/barrier shall be continuous without holes, gaps and other penetrations, and having surface mass of at least 20 kilograms per square metre.

The *Company* shall implement above noted *Noise Control Measure* not later than six (6) months after the issuance of an above grade building permit under the Building Code Act, 1992, for a building containing noise sensitive spaces in respect of the *Properties* or part thereof.

SCHEDULE C

Noise Tables

Table 1 - Maximum Sound power Levels (dB) for the stand-by blower

Source name and description	OBCF (Hz)	31.5	63	125	250	500	1 k	2 k	4 k	8 k	Overall Sound Power (dBA)
Stand-by Blower	Sound Power Level (dB)	85.4	80.4	80.4	79.4	82.4	85.4	85.4	83.4	80.4	91

Table 2 - Minimum Transmission Losses (TL) for the unloading area insulated bay door

Source ID	Source name and description	OBCF (Hz)	63	125	250	500	1 k	2 k	4 k	8 k
Insulated Bay Door	TL (dB)	-	6	15	22	25	26	26	31	

SCHEDULE D

Source Testing Procedures

1. The *Company* shall submit, not later than three (3) months after the *Date of Commencement* of operation of the *Facility*, a *Pre-Test Plan* for the *Source Testing* required under this *Approval*. The *Company* shall finalize the *Pre-Test Plan* in consultation with the *Manager*.
2. The *Company* shall not commence the *Source Testing* required under this *Approval* until the *Manager* has approved the *Pre-Test Plan*.
3. The *Company* shall complete the *Source Testing* not later than three (3) months after the *Manager* has approved the *Pre-Test Plan*, or within a period as directed or agreed to in writing by the *Manager* and the *District Manager*.
4. The *Company* shall notify the *Manager*, the *District Manager* and the *Director* in writing of the location, date and time of any impending *Source Testing* required by this *Approval*, at least fifteen (15) days prior to the *Source Testing*.
5. The *Company* shall submit a report (hardcopy and electronic format) on the *Source Testing* to the *Manager*, the *District Manager* and the *Director* not later than three (3) months after completing the *Source Testing*. The report shall be in the format described in the *Source Testing Code*, and shall also include, but not be limited to:
 - a. an executive summary;
 - b. the applicable North American Industry Classification System code (NAICS) for the *Facility*;
 - c. records of operating conditions at the time of *Source Testing*, including but not limited to the following:
 - i. production data including the number of dips per hour in the galvanizing tank and the amount of metal being pre-treated and galvanized in tonnes per day, and
 - ii. details regarding the operational parameters, and effectiveness of fume capture including but not limited to measurements demonstrating negative pressure for (a) the pre-treatment area fume extraction system and associated packed bed scrubber and (b) galvanizing keettle fume enclosure and associated baghouse dust collector;
 - d. results of *Source Testing*, including the emission rate, emission concentration, and relevant emission factor of the *Test Contaminants* from the *Targeted Sources*; and
 - e. a tabular comparison of *Source Testing* results for the *Targeted Sources* and *Test Contaminants* to original emission estimates described in the *Company's* application and the

ESDM Report.

6. The *Director* may not accept the results of the *Source Testing* if:
 - a. the *Source Testing Code* or the requirements of the *Manager* were not followed;
 - b. the *Company* did not notify the *Manager*, the *District Manager* and *Director* of the *Source Testing*; or
 - c. the *Company* failed to provide a complete report on the *Source Testing*.
7. If the *Director* does not accept the results of the *Source Testing*, the *Director* may require re-testing. If re-testing is required, the *Pre-Test Plan* strategies need to be revised and submitted to the *Manager* for approval. The actions taken to minimize the possibility of the *Source Testing* results not being accepted by the *Director* must be noted in the revision.
8. If the *Source Testing* results are higher than the emission estimates in the *Company's ESDM Report*, the *Company* shall update their *ESDM Report* with the results from the *Source Testing* report and make these records available for review by staff of the *Ministry* upon request. The updated Emission Summary Table from the updated *ESDM Report* shall be submitted with the report on the *Source Testing*.

SCHEDULE E

Target Sources and Test Contaminants

<i>Target Sources</i>	<i>Test Contaminants</i>	<i>CAS Number</i>
Pre-Treatment Scrubber Exhaust (Source ID: S1)	Hydrogen Chloride	7647-01-0
	Chromium Compounds	7440-47-3
	Ammonium Chloride	12125-02-9
	Zinc Chloride	7646-85-7
Zinc Dust Collector Exhaust (Source ID: S3)	Suspended Particulate Matter	N.A
	Zinc	7440-66-6
	Zinc Chloride	7646-85-7
	Zinc Oxide	1314-13-2
	Ammonia	7664-41-7
	Ammonium Chloride	12125-02-9

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

1. GENERAL

Condition No. 1 is included to require the *Approval* holder to build, operate and maintain the *Facility* in accordance with the Supporting Documentation in Schedule A considered by the *Director* in issuing this *Approval*.

2. LIMITED OPERATIONAL FLEXIBILITY, REQUIREMENT TO REQUEST AN ACCEPTABLE POINT OF IMPINGEMENT CONCENTRATION AND PERFORMANCE LIMITS

Conditions No. 2, 3 and 4 are included to limit and define the *Modifications* permitted by this *Approval*, and to set out the circumstances in which the *Company* shall request approval of an *Acceptable Point of Impingement Concentration* prior to making *Modifications*. The holder of the *Approval* is approved for operational flexibility for the *Facility* that is consistent with the description of the operations included with the application up to the *Facility Production Limit*. In return for the operational flexibility, the *Approval* places performance based limits that cannot be exceeded under the terms of this *Approval*. *Approval* holders will still have to obtain other relevant approvals required to operate the *Facility*, including requirements under other environmental legislation such as the *Environmental Assessment Act*.

3. DOCUMENTATION REQUIREMENTS

Condition No. 5 is included to require the *Company* to maintain ongoing documentation that demonstrates compliance with the performance limits as specified in Condition 4 of this *Approval* and allows the *Ministry* to monitor on-going compliance with these performance limits. The *Company* is required to have an up to date *ESDM Report* and *Acoustic Assessment Report* that describe the *Facility* at all times and make the *Emission Summary Table* and *Acoustic Assessment Summary Table* from these reports available to the public on an ongoing basis in order to maintain public communication with regard to the emissions from the *Facility*.

4. REPORTING REQUIREMENTS

Condition No. 6 is included to require the *Company* to provide a yearly *Written Summary Form* to the *Ministry*, to assist the *Ministry* with the review of the site's compliance with the *EPA*, the regulations and this *Approval*.

5. OPERATION AND MAINTENANCE

Condition No. 7 is included to require the *Company* to properly operate and maintain the *Processes with Significant Environmental Aspects* to minimize the impact to the environment from these processes.

6. COMPLAINTS RECORDING AND REPORTING PROCEDURE

Condition No. 8 is included to require the *Company* to respond to any environmental complaints regarding the operation of the *Equipment*, according to a procedure that includes methods for preventing recurrence of similar incidents and a requirement to prepare and retain a written report.

7. RECORD KEEPING REQUIREMENTS

Condition No. 9 is included to require the *Company* to retain all documentation related to this *Approval* and provide access to employees in or agents of the *Ministry*, upon request, so that the *Ministry* can determine if a more detailed review of compliance with the performance limits as specified in Condition 4 of this *Approval* is necessary.

8. SOURCE TESTING

Condition No. 10 is included to require the *Company* to gather accurate information so that compliance with the *EPA*, the regulations and this *Approval* can be verified.

9. ACOUSTIC AUDIT

Condition No. 11.1 is included to require the *Company* to gather accurate information so that the environmental impact and subsequent compliance with the *EPA*, the regulations and this *Approval* can be verified.

Condition No. 11.2 is included to ensure that the *Acoustic Audit* is carried out in accordance with procedures set in the *Ministry's* Noise Guidelines.

10. REVOCATION OF PREVIOUS APPROVALS

Condition No. 12 is included to identify that this *Approval* replaces all Section 9 Certificate(s) of Approval and Part II.1 Approvals in regards to the activities mentioned in subsection 9(1) of the *EPA* and dated prior to the date of this *Approval*.

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

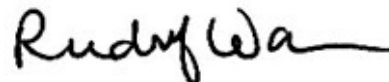
The Director appointed for the purposes of
Part II.1 of the Environmental Protection Act
Ministry of the Environment,
Conservation and Parks
135 St. Clair Avenue West, 1st Floor
Toronto, Ontario
M4V 1P5

*** 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 24th day of September, 2020



Rudolf Wan, P.Eng.

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

SA/

- c: Area Manager, MECP North Bay Area Office
- c: District Manager, MECP Sudbury District Office
Matthew Griffin, GHD Ltd.