

**ENVIRONMENTAL COMPLIANCE APPROVAL**

NUMBER 6593-BQHMQU  
Issue Date: July 29, 2020

Geosyntec Consultants International, Inc.  
130 Stone Road West  
Guelph, Ontario  
N1G 3Z2

Site Location: 185 Villiers Street  
City of Toronto

*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) smouldering combustion ex-situ remediation system to treat contaminated soil, discharging to the air at a maximum volumetric flow rate of 18.33 cubic metres per second through a stack equipped with one (1) granular activated carbon (GAC) system, having an exit diameter of 0.60 metre and extending 10 metres above grade;

all in accordance with the Environmental Compliance Approval Application submitted by Geosyntec Consultants International, Inc., dated April 7, 2020 and signed by David Major, Vice President; and the supporting information including the Emission Summary and Dispersion Modelling report prepared by Hurlburt Environmental Engineering, dated April 6, 2020 and signed by Antje Hurlburt.

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

1. "*Approval*" means this Environmental Compliance Approval, including the application and supporting documentation listed above;
2. "*Best Management Practices Plan*" means a document or a set of documents which describe measures to minimize dust emissions from the *Facility* and/or *Equipment*;
3. "*Company*" means Geosyntec Consultants International, Inc., which is responsible for the operation of the *Equipment* and *Process*, 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 being operated;

5. "*EPA*" means the *Environmental Protection Act* , R.S.O. 1990, c. E.19;
6. "*Equipment*" means the equipment associated with the *Process* as described in this *Approval*;
7. "*Exhausted* " means the capacity of the *GAC* to adsorb contaminant emissions is reached, and the granular activated carbon system is no longer able to effectively reduce emissions;
8. "*Facility*" means the entire operation located on the property where the *Equipment* and *Process* is located;
9. "*GAC*" means granular activated carbon;
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. "*O. Reg. 419/05*" means Ontario Regulation 419/05, Air Pollution – Local Air Quality, as amended;
12. "*Operations and Maintenance Manual* " means the written operations and maintenance manual developed for the *Equipment* and *Process* as described in Condition 3;
13. "*Process*" means the ex-situ remediation 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*;
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;
15. "*Qualified Person*" means a person identified as a Professional Engineer or Professional Geoscientist who meets the qualifications set out in subsection 5 (2) of Ontario Regulation 153/04 (Records of Site Condition – Part XV.1 of the Act), as amended, made under the *EPA*;
16. "*Remedial Work Plan*" means a plan, developed for the *Process* at the site by a *Qualified Person* and prepared as a single document as described in Condition 2;
17. "*Target Compound(s)*" means the soil contaminants 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 *Process* is designed to treat as part of the *Remedial Work Plan*; and
18. "*Technical Bulletin: Management Approaches for Industrial Fugitive Dust Sources*" means the *Ministry* publication "Technical Bulletin: management approaches for industrial fugitive dust sources", March 8, 2017, 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. PERFORMANCE REQUIREMENTS

1. The *Company* shall,
  - a. design and operate the *Equipment* and *Process* with the intent to reduce the soil concentrations of the *Target Compounds*;
  - b. before commencement of operation of the *Equipment* and *Process* at the site, prepare the following:
    - i. a *Remedial Work Plan*; and
    - ii. an *Operations and Maintenance Manual*;
  - c. ensure that the *GAC* is replaced before it is *Exhausted*;
  - d. ensure that the *GAC* maintains a minimum removal efficiency for all contaminant emissions to comply with *O. Reg. 419/05*; and
  - e. ensure that the noise emissions from the *Equipment* and *Process* at the site comply with the limits set out in *Ministry Publication NPC-300*.

### 2. REMEDIAL WORK PLAN

1. The *Company* shall, before commencement of operation of the *Process* at the site, prepare a *Remedial Work Plan* designed with specific application for the *Process* at the site that specifies, as a minimum:
  - a. the remedial objectives established for the site;
  - b. an overview of the work to be undertaken by the *Company*;
  - c. a description of the site;
  - d. a site plan overview of the extent of contamination at the site;
  - e. locations of the proposed *Equipment*;
  - f. land uses at the site and in the immediate surrounding vicinity;
  - g. a risk assessment of any potential hazards; and

- h. alternative remedial measures to be undertaken in the event that the *Process* is not successful to meet the *Remedial Work Plan* objectives.

### 3. OPERATION AND MAINTENANCE

1. The *Company* shall, before commencement of operation of the *Equipment* and *Process* at the site, prepare and implement an *Operations and Maintenance Manual* for the *Equipment* and *Process* that specifies, as a minimum:
  - a. major components of the *Equipment* to be used in the *Process*;
  - b. frequency of inspections and scheduled maintenance for the *Equipment*;
  - c. procedures to prevent and mitigate spills relating to the *Process*;
  - d. procedures to prevent and/or minimize odorous and noise emissions;
  - e. procedures to inspect, test and replace the *GAC* before it is *Exhausted*;
  - f. training procedures for person(s) operating the *Equipment* and *Process*;
  - g. on-site Health and Safety plans; and
  - h. procedures to record and respond to environmental complaints.

### 4. NOTIFICATION OF COMPLAINTS

1. The *Company* shall notify the *District Manager*, in writing, forthwith within two (2) business days of each complaint that the *Company* receives resulting from the operation of the *Process* at the site. The notification shall include:
  - a. a description of the time and date of the complaint and of the incident to which the complaint relates;
  - b. the nature of the complaint and the address of the complainant, if known;
  - c. weather conditions at the time of the incident to which the complaint relates;
  - d. a description of the measures taken to determine the possible causes of the complaint and the steps taken to investigate and deal with the cause of the incident to which the complaint relates and the steps taken and/or to be taken to prevent a similar occurrence in the future; and
  - e. a written response to the complainant, if known.

## 5. RECORD KEEPING REQUIREMENTS

1. The *Company* shall, retain for a minimum of five (5) years from the date of their creation, all reports, records, and information as described in this *Approval*, related to or resulting from the operation of the *Process* at the site including:
  - a. the *Remedial Work Plan*;
  - b. records about the inspection, maintenance, and repair of the major components of the *Equipment* related to the *Process*;
  - c. all soil testing and sampling results; and
  - d. records about complaints, including:
    - i. a description of the time and date of the complaint and of the incident to which the complaint relates;
    - ii. the nature of the complaint and the address of the complainant, if known;
    - iii. weather conditions at the time of the incident to which the complaint relates;
    - iv. a description of the measures taken to determine the possible causes of the complaint and the steps taken to investigate and deal with the cause of the incident to which the complaint relates and the steps taken and/or to be taken to prevent a similar occurrence in the future; and
    - v. a written response to the complainant, if known.

## 6. FUGITIVE DUST CONTROL

1. The *Company* shall develop in consultation with the *District Manager*, a *Best Management Practices Plan* for the control of fugitive dust emissions. This *Best Management Practices Plan* shall:
  - a. at minimum, be prepared in accordance with *Ministry Technical Bulletin: Management Approaches for Industrial Fugitive Dust Sources*; and
  - b. include a list of all *Ministry* comments received, if any, on the development of the *Best Management Practices Plan*, and a description of how each *Ministry* comment was addressed in the *Best Management Practices Plan*.
2. The *Company* shall submit the *Best Management Practices Plan* to the *District Manager* one (1) month before the commencement of operation of the *Process* at the site or as otherwise indicated by the *District Manager*.

3. Upon acceptance of the *Best Management Practices Plan* by the *District Manager*, the *Company* shall immediately implement the *Best Management Practices Plan* for the control of fugitive dust emissions to provide effective dust suppression measures to any potential sources of fugitive dust emissions resulting from the operation of the *Facility*.
4. The *Company* shall update the *Best Management Practices Plan* as necessary or at the direction of the *District Manager*.

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

1. Condition No. 1 is included to outline the minimum performance requirements considered necessary to prevent an adverse effect resulting from the operation of the *Facility*.
2. Condition No. 2 is included to require the *Company* to gather accurate information and prepare a work plan prior to carrying out the *Process* at the site so that compliance with the *EPA* and this *Approval* can be verified.
3. Condition No. 3 is included to emphasize that the *Equipment* and *Process* must be operated according to a procedure that will result in compliance with the *EPA*, the regulations, and this *Approval*.
4. Condition No. 4 is included to require the *Company* to notify the *Ministry* so that the environmental impact and subsequent compliance with the *EPA*, the regulations, and this *Approval* can be verified.
5. Condition 5 is included to require the *Company* to retain records and provide information to the *Ministry* so that the environmental impact and subsequent compliance with the *EPA*, the regulations, and this *Approval* can be verified.
6. Condition No. 6 is included to emphasize that the *Equipment* and *Process* must be operated according to a procedure that will result in compliance with the *EPA*, the Regulations and 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

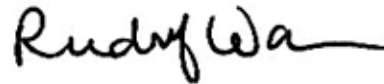
AND

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](http://www.ert.gov.on.ca).**

*The above noted activity is approved under s.20.3 of Part II.1 of the Environmental Protection Act.*

DATED AT TORONTO this 29th day of July, 2020



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

BR/

c: District Manager, MECP Toronto District Office  
Antje Hurlburt, Hurlburt Environmental Consulting