

ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER A-500-1611903838

Version: 1.0

Issue Date: October 8, 2021

Pursuant to section 20.3 of the Environmental Protection Act, R.S.O. 1990, c. E. 19 and subject to all other applicable Acts or regulations this Environmental Compliance Approval is issued to:

RESTING PAWS CEMETERY &
CREMATORIUM INC.

3395 TORBOLTON RIDGE ROAD
WOODLAWN ONTARIO
K0A 3M0

For the following site:

3395 TORBOLTON RIDGE Road , WOODLAWN, OTTAWA,
ONTARIO, CANADA, K0A 3M0

Upon issuance of the environmental compliance approval, I hereby revoke Approval No(s) 0129-8U6KLK, issued on June 28, 2013.

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) natural gas/propane fired cremation unit to process up to 45 kilograms per hour of Non-Infectious Remains of Companion Pets, having a total heat input of 1,500,000 kilojoules per hour, discharging into the air through a stack, having an exit diameter of 0.4 metre, extending 0.9 metre above the roof and 8.5 metres above grade;
- one (1) natural gas/propane fired cremation unit to process up to 182 kilograms per hour of Non-Infectious Remains of Companion Pets, having a total heat input of 1,899,000 kilojoules per hour, discharging into the air through a stack, having an exit diameter of 0.5 metre, extending 0.9 metre above the roof and 8.5 metres above grade;

all in accordance with the Application for Approval and all supporting information, dated February 26, 2021 and signed by Pierre-Yves Anglaret of Resting Paws Cemetery & Crematorium Inc.

DEFINITIONS

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. "CEM System" means the continuous emission monitoring system consisting of continuous monitors and recording devices;
3. "Companion Pets" means animals that were kept by humans for company, amusement or psychological support;
4. "Company" means Resting Paws Cemetery & Crematorium Inc. 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;
5. "District Manager" means the District Manager of the appropriate local district office of the Ministry, where the Facility is geographically located;
6. "EPA" means the *Environmental Protection Act*, R.S.O. 1990, c.E.19, as amended;
7. "Equipment" means the two (2) pet cremation units, described in the Company's application, this Approval and in the supporting documentation submitted with the application, to the extent approved by this Approval;
8. "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 Wellburn Consulting and dated February 22, 2021, submitted in support of the application, and includes any changes to the report made up to the date of issuance of this Approval;
9. "Facility" means the entire operation located on the property where the Equipment is located;
10. "Infectious Substance" means, a disease listed in,
 - (a) Schedule VII of the Health of Animals Regulations made under the Health of Animals Act (Canada) as amended, or
 - (b) the Reportable Diseases Regulations made under the Health of Animals Act (Canada) as amended;
11. "Larger Cremation Unit" means the larger pet cremation unit, having a processing capacity of 182 kilograms per hour, described in the Company's application, this Approval and in the supporting documentation submitted with the application, to the extent approved by this Approval;
12. "Manager" means the Manager, Technology Standards Section, Technical Assessment and Standards Development Branch, who has been appointed under section 5 of the EPA for the purposes of the section 11(1)2 of O. Reg. 419/05, or any other person who represents and carries out the duties of the Manager, Technology Standards Section, Technical Assessment and Development Branch, as those duties relate to the conditions of this Approval;
13. "Manual" means a document or a set of documents that provide written instructions to staff of the Company;
14. "Ministry" means the ministry of the government of Ontario responsible for the EPA and includes all officials, employees or other persons acting on its behalf;
15. "Non-Infectious Remains of Companion Pets" means whole carcasses or parts from carcasses of Companion Pets and are not contaminated with any Infectious Substance;
16. "Pre-Test Plan" means a plan for the Source Testing including the information required in section 5 of the Source Testing Code;
17. "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.
18. "Source Testing Code" means the Ontario Source Testing Code, dated June 2010, prepared by the Ministry, as amended;

19. "Source Testing" means sampling and testing to measure emissions resulting from operating the Targeted Source at a level of maximum production within the approved operating range of the equipment which satisfies paragraph 2 of subsection 11(1) of O. Reg. 419/05; and
20. "Test Contaminants" means those contaminants set out in Schedule 2 of this Approval.

TERMS AND CONDITIONS

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

1. PERFORMANCE REQUIREMENTS

The Company shall ensure that the design and operation of the Equipment comply with the following limits:

1. The concentration of organic matter in the combustion gases leaving the Equipment, expressed as equivalent methane, being an average of ten measurements taken at approximately one minute intervals, shall not exceed 100 parts per million by volume, on an undiluted basis;
2. The concentration of oxygen in the undiluted flue gas leaving the secondary chamber, as recorded by the CEM System, shall not be less than 6 percent by volume on a dry basis, calculated as a ten minute average;
3. The half-hour average concentration of carbon monoxide in the undiluted flue gases leaving the secondary combustion chamber, as recorded by the CEM System, shall not exceed 100 parts per million by volume, on a dry basis normalized to 11 percent oxygen at a reference temperature of 25 degrees Celsius and a reference pressure of 101.3 kilopascals;
4. The operating temperature in the secondary chamber of the Equipment, as recorded by the CEM System, shall not be less than 1,000 degrees Celsius at all times when the primary chamber is loaded and incineration is in progress.
5. The noise emissions from the Facility comply with the limits set out in Ministry Publication NPC-300.

2. OPERATION AND MAINTENANCE

1. The Company shall ensure that the Equipment is properly operated and maintained at all times. The Company shall:
 - a. prepare, prior to the commencement of operation of the Equipment and update, as necessary, a Manual outlining the operating procedures and a maintenance program for the Equipment, including as a minimum:
 - i. procedures to ensure that only Non Infectious Remains of Companion Pets are processed in the Equipment;
 - ii. operating and maintenance procedures in accordance with good engineering practice, including annual inspection procedures as recommended by the Equipment and CEM System suppliers;
 - iii. emergency procedures;
 - iv. procedures to control all discharges from the Equipment in the event of loss or failure of power source to the Equipment;
 - v. procedures for any record keeping activities relating to the operation and maintenance of the Equipment and the CEM System;

- vi. procedures for operator training which is to be provided by an individual experienced with the Equipment;
 - vii. procedures for recording and responding to complaints regarding the operation of the Equipment;
 - viii. all appropriate measures to minimize noise, fugitive dust and odorous emissions from all potential sources at the Facility; and
 - b. implement the recommendations of the Manual.
2. The Company shall operate the Equipment in accordance with the following procedures:
 - a. The burner flame in the secondary chamber shall be established before the primary chamber is fired;
 - b. The temperature in the secondary chamber, as measured by the CEM System, shall be maintained at minimum of 1,000 degrees Celsius at all times when the primary chamber is loaded and incineration is in progress;
 - c. The burner in the primary chamber shall shut off automatically if the secondary chamber burner fails.
3. The Company shall ensure that only Non-Infectious Remains of Companion Pets are burned in the Equipment.

3. SOURCE TESTING

1. The Company shall perform Source Testing, not later than three (3) months after the commencement of operation of the Larger Cremation Unit, in accordance with the procedure outlined in Schedule 1 to determine the rate of emission of Total Suspended Particulate Matter and Total Hydrocarbon Compounds Matter from the Larger Cremation Unit.
2. In the event that the results of the Source Testing indicate that the concentration of particulate matter in the undiluted gas emitted from the Larger Cremation Unit exceeds 20 milligrams per cubic metre on a dry basis, normalized to 11% oxygen, the Company shall perform Source Testing not later than three (3) months after the first Source Testing, to determine the rate of emission of the Test Contaminants listed in Schedule 2 from the Equipment.

4. CONTINUOUS MONITORING

1. The Company shall, prior to the commencement of operation of the Equipment, install and subsequently conduct and maintain a program to continuously monitor:
 - a. the carbon monoxide and oxygen concentration in the undiluted flue gas leaving the secondary chamber of the Equipment;
 - b. the temperature at the location in the secondary chamber of the Equipment where the minimum retention time of the combustion gases at a minimum temperature of 1,000 degrees Celsius for at least one second is achieved.
2. The CEM System shall be equipped with continuous recording devices and shall comply with the requirements outlined in the attached Schedule 3.

5. RECORD RETENTION

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. These records shall be made available to staff of the Ministry upon request. The Company shall retain:

1. all records on maintenance, repair and inspection of the Equipment and the CEM System;

2. all records produced by the CEM System;
3. all records of operator training;
4. all records on the environmental complaints, including:
 - a. a description, time and date of the incident;
 - b. wind direction at the time of the incident; and
 - c. a description of the measures taken to address the cause of the incident and to prevent a similar occurrence in the future;
5. daily records of each load processed by the Equipment;
6. description of any upset conditions associated with the operation of the Equipment and remedial action taken.

6. NOTIFICATION

The Company shall notify the District Manager, in writing, of each environmental complaint and the measures taken to address the complaint within two (2) business days of the complaint. The notification shall include:

1. a description of the nature of the complaint; and
2. the time and date of the incident to which the complaint relates.

REASONS

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

1. Condition No. 1 is included to provide the minimum performance requirement considered necessary to prevent an adverse effect resulting from the operation of the Facility.
2. Condition No. 2 is included to emphasize that the Equipment must be maintained and operated according to a procedure that will result in compliance with the EPA, the Regulations and this Approval.
3. Conditions No. 3 and 4 are 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.
4. Condition No. 5 is included to require the Company to keep records and to provide information to staff of the Ministry so that compliance with the EPA, the Regulations and this Approval can be verified.
5. Condition No. 6 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.

APPEAL PROVISIONS

In accordance with Section 139 of the *Environmental Protection Act*, you may by written notice served upon me and the Ontario Land Tribunal, within 15 days after the service of this notice, require a hearing by the Tribunal. You must also provide notice to, the Minister of the Environment, Conservation and Parks in

accordance with Section 47 of the *Environmental Bill of Rights, 1993* who will place notice of your appeal on the Environmental Registry. Section 142 of the *Environmental Protection Act* provides that the notice requiring the hearing ("the Notice") shall state:

- I. 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;
- II. 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:

- I. The name of the appellant;
- II. The address of the appellant;
- III. The environmental compliance approval number;
- IV. The date of the environmental compliance approval;
- V. The name of the Director, and;
- VI. 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:

Registrar* Ontario Land Tribunal 655 Bay Street, Suite 1500 Toronto, Ontario M5G 1E5 OLT.Registrar@ontario.ca	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 <i>Environmental Protection Act</i> Ministry of the Environment, Conservation and Parks 135 St. Clair Avenue West, 1st Floor Toronto, Ontario M4V 1P5
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*** Further information on the Ontario Land Tribunal's requirements for an appeal can be obtained directly from the Tribunal at: Tel: (416) 212-6349 or 1 (866) 448-2248, or www.olt.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 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 8th day of October, 2021



Neryed Ragbar

Director

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

c: Colin Welburn, P.Eng., Welburn Consulting
Pierre-Yves Anglaret

The following schedules are a part of this environmental compliance approval:

SCHEDULE 1

Source Testing Procedure

1. The Company shall submit, at least three (3) months prior to the commencement of operation of the Larger Cremation Unit, to the Manager, a Pre-Test Plan for the Source Testing required under this Approval.
2. The Company shall finalize the Pre-Test Plan in consultation with the Manager.
3. The Company shall not commence the Source Testing required under this Approval until the Manager has approved the Pre-Test Plan.
4. The Company shall notify the Manager, District Manager, and 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 complete the Source Testing, no later than three (3) months after the commencement of operation of the Larger Cremation Unit or two (2) months after the Manager has approved the Pre-Test Plan, whichever occurs later.
6. The Company shall submit a report on the Source Testing to the Manager, District Manager, and Director not later than two (2) 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:
 1. an executive summary;
 2. records of operating conditions at the time of Source Testing including but not limited to the following:
 1. production data;
 2. Facility/process information related to the targeted source;
 3. description of the emission sources controlled by the targeted source at the time of testing;
 4. operational description of the general building ventilation at the time of testing;
 3. all records produced by the continuous monitoring systems;
 4. results of Source Testing, including the emission rates and emission concentrations of the Test Contaminants;
 5. a tabular comparison of Source Testing results for the Test Contaminants to original emission estimates described in the Company's application and the ESDM Report;
7. If the Source Testing results are higher than the emission estimates in the Company's ESDM Report, the Company shall update their ESDM Report in accordance with section 26 of O.Reg. 419/05 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.
8. The Director may not accept the results of the Source Testing if:
 1. the Source Testing Code or requirements of the Manager were not followed;
 2. the Company did not notify the Manager, District Manager and Director of the Source Testing;
or
 3. the Company failed to provide a complete report on the Source Testing.

9. 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.

SCHEDULE 2

Test Contaminants

Total Hydrocarbon Compounds
Hydrogen Chloride
Total Suspended Particulate Matter
Benzo(a) Pyrene
Naphthalene
Acrolein

List of Dioxins, Furans and Dioxin-like PCBs

2,3,7,8-Tetrachlorodibenzo-p-dioxin [2,3,7,8-TCDD]
1,2,3,7,8-Pentachlorodibenzo-p-dioxin [1,2,3,7,8-PeCDD]
1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin [1,2,3,4,7,8-HxCDD]
1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin [1,2,3,6,7,8-HxCDD]
1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin [1,2,3,7,8,9-HxCDD]
1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin [1,2,3,4,6,7,8-HpCDD]
1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin [1,2,3,4,6,7,8,9-OCDD]
2,3,7,8-Tetrachlorodibenzofuran [2,3,7,8-TCDF]
2,3,4,7,8-Pentachlorodibenzofuran [2,3,4,7,8-PeCDF]
1,2,3,7,8-Pentachlorodibenzofuran [1,2,3,7,8-PeCDF]
1,2,3,4,7,8-Hexachlorodibenzofuran [1,2,3,4,7,8-HxCDF]
1,2,3,6,7,8-Hexachlorodibenzofuran [1,2,3,6,7,8-HxCDF]
1,2,3,7,8,9-Hexachlorodibenzofuran [1,2,3,7,8,9-HxCDF]
2,3,4,6,7,8-Hexachlorodibenzofuran [2,3,4,6,7,8-HxCDF]
1,2,3,4,6,7,8-Heptachlorodibenzofuran [1,2,3,4,6,7,8-HpCDF]
1,2,3,4,7,8,9-Heptachlorodibenzofuran [1,2,3,4,7,8,9-HpCDF]
1,2,3,4,6,7,8,9-Octachlorodibenzofuran [1,2,3,4,6,7,8,9-OCDF]

3,3',4,4'-Tetrachlorobiphenyl [3,3',4,4'-tetraCB (PCB 77)]
3,4,4',5- Tetrachlorobiphenyl [3,4,4',5-tetraCB (PCB 81)]
3,3',4,4',5- Pentachlorobiphenyl (PCB 126) [3,3',4,4',5-pentaCB (PCB 126)]
3,3',4,4',5,5'- Hexachlorobiphenyl [3,3',4,4',5,5'-hexaCB (PCB 169)]
2,3,3',4,4'- Pentachlorobiphenyl [2,3,3',4,4'-pentaCB (PCB 105)]
2,3,4,4',5- Pentachlorobiphenyl [2,3,4,4',5-pentaCB (PCB 114)]
2,3',4,4',5- Pentachlorobiphenyl [2,3',4,4',5-pentaCB (PCB 118)]
2',3,4,4',5- Pentachlorobiphenyl [2',3,4,4',5-pentaCB (PCB 123)]
2,3,3',4,4',5- Hexachlorobiphenyl [2,3,3',4,4',5-hexaCB (PCB 156)]
2,3,3',4,4',5'- Hexachlorobiphenyl [2,3,3',4,4',5'-hexaCB (PCB 157)]
2,3',4,4',5,5'- Hexachlorobiphenyl [2,3',4,4',5,5'-hexaCB (PCB 167)]
2,3,3',4,4',5,5'- Heptachlorobiphenyl [2,3,3',4,4',5,5'-heptaCB (PCB 189)]

SCHEDULE 3

CEM System Requirements.

A - Parameter: Temperature

LOCATION:

The sample point for the Continuous Temperature Monitor shall be located in the secondary chamber where the minimum retention time of the combustion gases at a minimum temperature of 1,000 degrees Celsius for at least one second is achieved.

PERFORMANCE:

The Continuous Temperature Monitor shall meet the following minimum performance specifications for the following parameters:

1. Type: shielded "K" type thermocouple, or equivalent
2. Accuracy: ± 1.5 percent of the minimum gas temperature

DATA RECORDER:

The data recorder must be capable of registering continuously the measurement of the monitor without a significant loss of accuracy and with a time resolution of 1 minutes or better.

RELIABILITY:

The monitor shall be operated and maintained so that accurate data is obtained during a minimum of 95 percent of the time for each calendar quarter.

B- Parameter: Oxygen

INSTALLATION:

The Continuous Oxygen Monitor shall be installed at an accessible location where the measurements are representative of the actual concentration of oxygen in the undiluted gases leaving the Equipment and shall meet the following installation specifications:

- 1 Range (percentage): 0 - 20 or 0 - 25
- 2 Calibration Gas Ports: close to the sample point

PERFORMANCE:

The Continuous Oxygen Monitor shall meet the following minimum performance specifications for the following parameters.

1. Span Value (percentage): 80-100% of full scale
2. Relative Accuracy: maximum 10 percent of the mean value of the reference method test data
3. Calibration Error: 0.25 percent O₂
4. System Bias: maximum 4 percent of the mean value of the reference method test data or ± 0.5 percent Oxygen, whichever is greater
5. Procedure for Zero and Span Calibration check: all system components checked
6. Zero Calibration Drift (24-hour): maximum 0.5 percent O₂
7. Span Calibration Drift (24-hour): maximum 0.5 percent O₂
8. Response Time (90 percent response to a step change): maximum 90 seconds
9. Operational Test Period: minimum 168 hours without corrective maintenance

CALIBRATION:

Daily calibration drift checks on the monitor shall be performed and recorded in accordance with the requirements of Report EPS 1/PG/7.

DATA RECORDER:

The data recorder must be capable of registering continuously the measurement of the monitor with an accuracy of 0.5 percent of a full scale reading or better and with a time resolution of 2 minutes or better.

RELIABILITY:

The monitor shall be operated and maintained so that accurate data is obtained during a minimum of 90 percent of the time for each calendar quarter during the first full year of operation, and 95 percent, thereafter.

C- Parameter: Carbon Monoxide

INSTALLATION:

The Continuous Carbon Monoxide Monitor shall be installed at an accessible location where the measurements are representative of the actual concentration of carbon monoxide in the undiluted gases leaving the Equipment and shall meet the following installation specifications:

1. Range (parts per million, ppm): 0 to > 100
2. Calibration Gas Ports: close to the sample point

PERFORMANCE:

The Continuous Carbon Monoxide Monitor shall meet the following minimum performance specifications for the following parameters:

1. Span Value (nearest ppm equivalent): 2 times the average normal concentration of the source
2. Relative Accuracy: maximum 10 percent of the mean value of the reference method test data or ± 5 ppm whichever is greater
3. Calibration Error: maximum 2 percent of actual concentration
4. System Bias: maximum 4 percent of the mean value of the reference method test data
5. Procedure for Zero and Span Calibration Check: all system components checked
6. Zero Calibration Drift (24-hour): maximum 5 percent of span value
7. Span Calibration Drift (24-hour): maximum 5 percent of span value
8. Response Time (90 percent response to a step change): maximum 90 seconds
9. Operational Test Period: minimum 168 hours without corrective maintenance

CALIBRATION:

Daily calibration drift checks on the monitor shall be performed and recorded in accordance with the requirements of Report EPS 1/PG/7.

DATA RECORDER:

The data recorder must be capable of registering continuously the measurement of the monitor with an accuracy of 0.5 percent of a full scale reading or better and with a time resolution of 2 minutes or better.

RELIABILITY:

The monitor shall be operated and maintained so that accurate data is obtained during a minimum of 90 percent of the time for each calendar quarter during the first full year of operation, and 95 percent, thereafter.