

AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER A620200

Issue Date: July 23, 2021

Cyanide Destruct Systems Inc.
293 Saunders Rd
Barrie, Ontario
L4N 9A3

Site Location: 293 Saunders Road
Barrie City, County of Simcoe
L4N 9A3

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 0.65 hectare Waste Disposal Site (Processing and Transfer) for solid and liquid subject waste and consisting of the following:

- a 1,115 m² building;
- one (1) drum crusher
- one(1) shredder
- one (1) roll off waste bin
- one (1) ISO steel shipping container adapted for flammable waste storage
- equipment and storage tanks as detailed in Schedule "B"
- Solidification/Bulking and Transfer Building

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

" Approval" means this Environmental Compliance Approval and any Schedules to it, including the application and supporting documentation listed in Schedule "A";

"Company" means Cyanide Destruct Systems Inc., including its officers, employees, agents or contractors;

"Director" means any Ministry employee appointed in writing by the Minister pursuant to section 5 of the EPA as a Director for the purposes of Part II.1 of the EPA;

"District Manager" means the District Manager of the local district office of the Ministry for the geographic area in which the Site is located;

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

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

"Operator" means any person, other than the Company's employees, authorized by the Company as having the charge, management or control of any aspect of the Site;

"OWRA" means the *Ontario Water Resources Act*, R.S.O. 1990, c. O.40, as amended;

"PA" means the *Pesticides Act*, R.S.O. 1990, c. P-11, as amended from time to time;

"Processed waste" means waste that has either been received at the Site as source separated or gone through the processing operation, consists of a uniform waste stream and is destined for end market for recycling or reuse;

"Provincial Officer" means any person designated in writing by the Minister as a provincial officer pursuant to section 5 of the OWRA or section 5 of the EPA or section 17 of PA

"Regulation 347" means Regulation 347, R.R.O. 1990, General - Waste Management, made under the EPA, as amended from time to time;

"Residual waste" means waste that is destined for final disposal;

"Site" means the transfer and processing facility permitted under this Approval, located at 239 Saunders Road, City of Barrie, Ontario;

"Subject waste" means wastes received at the Site in a mixed state and which has not completed the Company's processing operation; and

"Trained" means an employee who has been trained in accordance with Condition 4.2.

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

TERMS AND CONDITIONS

PART 1 - GENERAL

Revoke and Replace

1.1 This Environmental Compliance Approval revokes all previously issued Approvals issued under Part V, EPA, for this Site. The approval given herein, including the Terms and Conditions set out below, replaces all previously issued approvals and related Terms and Conditions under Part V, EPA for this Site.

In Accordance With

1.2 1. Except as otherwise provided by these conditions, the Site shall be designed, developed, used, maintained and operated, and all facilities, equipment and fixtures shall be built and installed, in accordance with the Environmental Compliance Approval Application dated April 25, 2017, and the supporting documents as listed in Schedule "A".

2. Construction and installation of the aspects of the Site described in the most recent application listed in Schedule "A" must be completed within 5 years of the later of:

(a) the date this Approval is issued; or

(b) if there is a hearing or other litigation in respect of the issuance of this Approval, the date that this hearing or litigation is disposed of, including all appeals.

3. This Approval ceases to apply in respect of the aspects of the Site noted above that have not been constructed or installed before the later of the dates identified in Condition 1.2.2 above.

Legal Obligations

1.3 The requirements specified in this Approval are the requirements under the EPA. The issuance of this Approval in no way abrogates the Company's legal obligations to take all reasonable steps to avoid violating other applicable provisions of this legislation and other legislation and regulations.

1.4 The Company shall ensure compliance with all the terms and conditions of this Approval. Any non-compliance constitutes a violation of the EPA and is grounds for enforcement.

1.5 The Company shall ensure that approvals required under Section 9 of the EPA are in place before new waste activities permitted under this Approval which discharge to air are undertaken.

1.6 Any wastewater discharged from the Site must be done in accordance with all applicable municipal, provincial or federal legislation, regulations and by-laws.

Availability of Information

1.7 a. The Company shall, forthwith upon request of the Director, District Manager, or Provincial Officer, furnish any information requested by such persons with respect to compliance with this Approval, including but not limited to, any records required to be kept under this Approval; and

b. In the event the Company provides the Ministry with information, records, documentation or notification in accordance with this Approval (for the purposes of this condition referred to as "Information"),

i. the receipt of information by the Ministry;

ii. the acceptance by the Ministry of the information's completeness or accuracy; or

iii. the failure of the Ministry to prosecute the Company, or to require the Company to take any action, under this Approval or any statute or regulation in relation to the information;

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

Ministry Inspections

1.8 The Company shall allow Ministry personnel, or a Ministry authorized representative(s), upon presentation of credentials, to:

a. carry out any and all inspections authorized by Section 156, 157 or 158 of the EPA, Section 15, 16 or 17 of the OWRA, or Section 19 or 20 of the PA, of any place to which this Approval relates; and,

b. without restricting the generality of the foregoing, to:

i. enter upon the premises where the records required by the conditions of this Approval are kept;

ii. have access to and copy, at reasonable times, any records required by the conditions of this Approval;

iii. inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations required by the conditions of this Approval; and

iv. sample and monitor at reasonable times for the purposes of assuring compliance with the conditions of this Approval.

Interpretation

1.9 The requirements of this Approval are severable. If any requirement of this Approval, or the application of any requirement of this Approval to any circumstance, is held invalid, the application of such requirement to other circumstances and the remainder of this Approval shall not be affected in any way.

1.10 a. Where there is a conflict between a provision of any document referred to in Schedule "A", and the conditions of this Approval, the conditions in this Approval shall take precedence; and

b. Where there is a conflict between documents listed in Schedule "A", the document bearing the most recent date shall prevail.

1.11 The Company shall ensure that all communications/correspondence made pursuant to this Approval includes reference to the Approval number.

Duty to Notify

1.12 The Company shall notify the Director in writing of any of the following changes within thirty (30) days of the change occurring:

a. change of ownership of the Site;

b. appointment of, or change in the Operator of the Site;

c. change of address of the Company;

d. change of partners where the Company is or at any time becomes a partnership, and a copy of the most recent declaration filed under the **Business Names Act**, 1991 shall be included in the notification to the Director;

e. any change of name of the corporation where the Company is or at any time becomes a corporation, and a copy of the most current "Initial Notice or Notice of Change" (form 1 or 2 of O. Regulation 182, Chapter C-39, R.R.O. 1990 as amended from time to time), filed under the **Corporations Information Act** shall be included in the notification to the Director; and

f. change in directors or officers of the corporation where the Company is or at any time becomes a corporation, and a copy of the most current "Initial Notice or Notice of

Change" as referred to in 10(d), supra.

1.13 In the event of any change in ownership of the Site, the Company shall notify, in writing, the succeeding owner of the existence of this Provisional Approval, and a copy of such notice shall be forwarded to the Director.

Release of Information

1.14 Any information relating to this Approval and contained in Ministry files may be made available to the public in accordance with the provisions of the **Freedom of Information and Protection of Privacy Act**, R.S.O. 1990, C. F-31.

PART 2 - FINANCIAL ASSURANCE

2.1 a. The Company shall provide the Ministry, financial assurance as defined in Section 131 of the EPA, in the amount of **\$280,573**. This financial assurance shall be in a form acceptable to the Director, and shall provide sufficient funds for the analysis, transportation, Site clean-up, monitoring and disposal of all quantities of waste on-Site at any one time.

b. By March 31, 2023, and every three (3) years thereafter, the Company shall prepare and submit to the Director a new financial assurance calculation for this Site. The monetary value of the financial assurance shall include the following costs:

i. remove, transport and dispose of the maximum amount of waste approved for storage at this Site;

ii. rinse down all storage tanks and process equipment and dispose of all contaminated rinse waters;

iii. demolish or dispose of all storage tanks (steel, FRP, and polyethylene) for scrap or recycle;

iv. demolish or dispose of process equipment complete with all associated piping, valves, pumps and controls;

v. spot test surfaces of the former processing room for contaminants such as cyanide and cyanide-containing compounds, gold, silver and other heavy metals;

vi. power wash or sweep entire containment area after removal of all wastes and equipment.

c. Upon acceptance of the Director of the new financial assurance required under

Condition 2.1 b. above, the Company shall adjust (increase or decrease accordingly) the financial assurance amount. The revised financial assurance shall be submitted within twenty (20) days of the Director's acceptance of the calculation.

d. The amount of financial assurance is subject to review at any time by the Director and may be amended at his/her discretion.

e. If any financial assurance is scheduled to expire or notice is received, indicating financial assurance will not be renewed, and satisfactory methods have not been made to replace the financial assurance at least sixty (60) days before the financial Assurance terminates, the financial assurance shall forthwith be replaced by cash.

PART 3 - OPERATIONS

Approved Waste

3.1 The only wastes that may be received at this Site are as following:

(1) Solid non-hazardous waste, includes asbestos waste;

(2) Solid and liquid non-hazardous soil;

(2) Liquid industrial and liquid and solid hazardous waste limited to the following Waste Classes: 111-114, 121-123, 131-133, 134, 135, 141, 142, 143, 144-150, 211-213, 221, 222, 231-233, 241, 242, 251-254, 261, 262, 263, 264-270, and 331, as described in the New Ontario Waste Classes, January 1986, or as amended.

3.2 This Site is approved to receive waste generated in Canada and the United States.

Approved Quantities and Storage Requirements

3.3 a. The maximum amount of waste which may be accepted at the Site shall not exceed 60,000 litres liquid waste per day and 500 tonnes solid waste per day;

b. The maximum amount of unprocessed, processed and residual waste that may be stored on the Site at any one time in tanks or containers such as drums or totes shall not exceed:

(1) 200,000 litres liquid waste

(2) 50 tonnes of solid non-hazardous waste

(3) 15 tonnes of bagged asbestos waste; and

(4) 500 tonnes of non-hazardous soil

c. i. The maximum amount of unprocessed, processed and residual waste that may be transferred from the Site shall not exceed 100,000 litres liquid waste per day and 500 tonnes solid waste per day.

ii. The maximum amount of waste that may be transferred from the Site for final disposal shall not exceed 1000 tonnes per day, based on an annual average for the calendar year (January 1 to December 31).

d. If for any reason waste cannot be transferred from the site, the Site shall cease accepting waste until normal operations can resume.

3.4 a. Non-hazardous solid waste may be stored outside the building, in covered roll-off containers, located in the southwest portion of the property.

b. All waste, excluding non-hazardous solid waste, shall be stored inside the building in areas equipped with spill containment.

c. All waste storage tanks, processing equipment and drums shall be clearly labelled with the following information at a minimum:

i. tank number (if applicable);

ii. volume;

iii. contents;

iv. waste class and waste characteristics (if applicable); and

v. WHMIS and TDGA classification (if applicable).

3.5 a. The Company shall ensure that all waste shall be stored in accordance with the Ministry's publication entitled "Guidelines for Environmental Protection Measures at Chemical and Waste Storage Facilities", dated May 2007, or as amended;

b. All waste materials and equipment shall be located in appropriate storage areas with appropriate dykes or berms which are designed and constructed in such a manner that they are capable of retaining any spill or leak of waste material that may occur at the Site; and

c. Incompatible waste materials shall be stored in separate containment areas. Each containment area shall have sufficient spill storage to contain 110% of the capacity of the largest storage vessel or piece of equipment within the impoundment.

Hours of Operation

3.6 a. The Company shall only accept waste at the Site, and ship wastes from the Site, between the hours of 6:00 a.m. and 8:00 p.m., Monday to Friday inclusive; and

b. The Company shall post signs in prominent locations at the Site, setting out the approved hours of operation of the Site, the name of the owner of the Site and name and telephone number of a person to contact in an emergency.

c. The Company may accept waste outside of the hours noted in Condition 3.6 a. on an emergency basis only.

3.7 The Company shall ensure that the Site is always maintained in a secure manner, such that unauthorized vehicles/persons cannot enter the Site.

Waste Receiving

3.8 a. During the unloading/loading of waste materials in bulk, all vehicles shall be positioned such that the bulk waste are unloaded/loaded within the confines of the building. Waste unloaded/loaded in drums, totes or other enclosed containers may be unloaded/loaded a loading dock equipped with spill control measures.

b. All incoming and outgoing wastes shall be inspected and tested by trained personnel, as detailed in the application and supporting documentation listed in Schedule "A" of this Approval, prior to being received, processed, transferred or shipped.

c. Notwithstanding the requirements of Condition 3.8 a., all reasonable measure in the way of laboratory, compatibility and bench testing of waste shall be taken to ensure that the processing of wastes at the Site will not result in uncontrollable reactions that could result in a fire or release of contaminants to the natural environment

Processing

3.9 a. The Company shall ensure that processing activities at the Site are limited to the following:

I. hydrolysis of cyanide laden waste;

- II. stripping of gold plated scrap;
- III. extraction of gold and silver from cyanide solutions;
- IV. bulking / blending of waste;
- V. drum washing and crushing;
- VI. de-packaging and shredding of packaging material.
- VII. solidification/stabilization of liquid soil

b. All activities related to the processing and transfer of wastes shall be conducted indoors at all times.

c. Liquid soil may be received in the solidification bay located in the SBT Building shown in Item 6 of Schedule "A", solidified using peat moss, saw dust or clay/bentonite, and shipped from the Site for disposal.

d. Solid soil and liquid soil that has been solidified at the Site shall not be sent off-site directly for reuse, but may be sent to another site permitted to receive that waste for further testing and/or processing prior to reuse.

Land Disposal Restrictions

3.10 a. The Company must ensure that all of the wastes generated at the Site are disposed in accordance with Regulation 347.

b. Hazardous Industrial Waste (Schedule 1, Regulation 347), Acute Hazardous Waste Chemical (Schedule 2(A), Regulation 347), Hazardous Waste Chemical (Schedule 2(B), Regulation 347) and Severely Toxic Waste (Schedule 3, Regulation 347) may not be mixed, bulked, blended, put into a common container, or processed with any other waste material at the Site unless the procedures specified in this Condition are followed:

only compatible wastes may be mixed bulked or blended;

i. a mixture of a Severely Toxic Waste and any other waste(s) is a Severely Toxic Waste;

ii. a mixture of an Acute Hazardous Waste Chemical and any other

waste(s) except a Severely Toxic Waste is an Acute Hazardous Waste Chemical;

- iii. a mixture of a Hazardous Waste Chemical and any other waste(s) except a Severely Toxic Waste or an Acute Hazardous Waste Chemical is a Hazardous Waste Chemical; and,
- iv. a mixture of a Hazardous Industrial Waste and any other waste(s) except Severely Toxic Waste, an Acute Hazardous Waste Chemical or a Hazardous Waste Chemical is a Hazardous Industrial Waste;

c. The listed Subject Wastes and the responding waste characterization referred to in Condition 3.10 b. of this Approval, may not be changed by the Company once received at the Site.

Nuisance Control

3.11 The Company shall ensure that the Site is operated in a manner which minimizes the impacts of odour, dust and traffic on the environment and the public.

3.12 At no time is incineration or burning allowed at the Site.

Inspections

3.13 The Company shall conduct regular inspections of the equipment, in accordance with manufacturers' recommendations, and facilities to ensure that all relevant processing and storage equipment and facilities at the Site are maintained in good working condition at all times. Any deficiencies, that might negatively impact the environment, detected during these regular inspections must be promptly corrected.

Preventative Maintenance

3.14 The Company shall ensure that all appropriate measures are taken to prevent the generation of airborne contaminant emissions from the Site. If airborne contaminant emissions from the Site cause or have the potential to cause an adverse effect, as defined in the Act, immediate action shall be taken by the Company to abate the emission. If, in the opinion of the District Manager, these measures do not abate the emission, and if the District Manager provides written notice to the Company, receipt and processing of waste at the Site shall cease immediately until the cause of the emission has been abated to the satisfaction of the District Manager.

SBT Building

3.15 Construction and installation of the SBT Building shown in Item 6 of Schedule "A" must be completed within 5 years of the later of:

- (a) the date this Approval is issued; or
- (b) if there is a hearing or other litigation in respect of the issuance of this Approval, the date that this hearing or litigation is disposed of, including all appeals.

3.16 This Approval ceases to apply in respect of the aspects of the Site noted above that have not been constructed or installed before the later of the dates identified in Condition 3.15 above.

PART 4 - TRAINING

4.1 The Company shall develop and maintain a training plan for each employee that operates the Site. Only trained personnel may operate the Site or carry out any activity required under this Approval.

4.2 The training plan required by Condition 4.1 shall ensure that employees are trained in the following, at a minimum:

- a. terms, conditions and operating requirements of this Approval;
- b. operation and management of the Site, or area(s) within the Site, in accordance with the specific job requirements of each individual employee, and which may include procedures for receiving, screening and identifying, testing, refusal, handling and temporarily storing wastes;
- c. shipping and manifesting procedures, if such functions fall within the job requirements of an individual employee; an outline of the responsibilities of Site employees including roles and responsibilities during emergencies and spills;
- d. the Spill Emergency and Contingency Plan including exit locations and evacuation routing, and location of relevant equipment available for emergencies and spills;
- e. environmental, and occupational health and safety concerns pertaining to the wastes received;
- f. emergency first-aid information;
- g. record keeping / documentation procedures;
- h. equipment and site inspection procedures;
- i. preventative maintenance procedures;
- j. nuisance impact control procedures; and
- k. procedures for recording and responding to public complaints.

PART 5 - SPILLS AND EMERGENCY RESPONSE

Spill Prevention and Emergency Response Plan

5.1 All floor drains shall be sealed to prevent the escape of waste materials.

5.2 The Company shall have in place an Emergency Response plan that contains, at a minimum, the following information:

- a. a floor plan identifying areas of waste storage and waste processing and the types of chemicals found in each;
- b. clean up procedures;
- c. a list of emergency equipment and resources available on Site; and
- d. a notification protocol with names and telephone numbers of persons to be contacted, including Township personnel, the Ministry Spills Action Centre and District Office and the local Fire Department.

5.3 The Emergency Response Plan shall be:

- a. kept in a central location, available to all employees at all times; and
- b. a copy shall be kept at the entrance to the Site in a location accessible to emergency responders; and

5.4 The Emergency Response Plan shall be updated when changes are made to the facility (physical structure) or the organization (staffing changes, changes in job responsibilities etc). At a minimum the Emergency Response Plan shall be reviewed annual to ensure that the notification protocol, names and telephone numbers are up-to-date.

5.5 The Company shall ensure that the equipment and materials outlined in the Emergency Response Plan shall be kept in a good state of repair, fully operational and immediately available at all times.

Spill Reporting

5.6 All spills and upsets shall be immediately reported to the Ministry's Spills Action Centre at 1-800-268-6060.

Spill Response

5.7 The Company shall immediately take all measures necessary to contain and clean up any spill or leak resulting from the operation of the Site.

PART 6 - COMPLAINTS

6.1 If the Company received a complaint regarding the operation of the Site, the Company shall response to the complaint accordingly:

- a. make a record of the complaint including, but not limited to, the following information
 - i. the nature of the complaint
 - ii. if the complaint is odour related, the weather conditions and wind direction at the time of the complaint;
 - iii. the name and contact information of the complainant (if provided);
 - iv. the time and date of the complaint
- b. immediately notify the District Manager, or Spills Action Centre;
- c. initiate steps to determine the cause(s) of the complaint and proceed to take the necessary actions to eliminate the cause(s);
- d. forward a formal reply to the complainant of the outcome of 6.1 c;
- e. submit a written report to the District Manager within three (3) days of the complaint date identifying the cause(s) of the complaint, actions taken to address the complaint and remedial action taken to prevent future reoccurrence which may include temporary ceasing of all operations until the problem is rectified.

PART 7 - DOCUMENTATION

Record Retention

7.1 All records and monitoring data required by the conditions of this Approval must be kept on the Company's premises for a minimum period of two (2) years from the date of their creation.

Design and Operations Report

7.2 The Owner shall maintain a consolidated Design and Operations Report that shall be kept up-to-date with any design and operational changes. The Design and Operations Report shall be revised annually and made available for inspection by a Provincial Officer upon request.

7.3 The Design and Operations Report shall describe current Site operations as reflected in the conditions of this Approval, and shall contain as a minimum the

information specified for a waste processing site as described in the most recent version of the Ministry publication "Guide for Applying for Approval of Waste Disposal Site" as it applies to this Site.

7.4 Any changes to Site operation conditions of this Approval requires that the Owner submits application for an amendment to Environmental Compliance Approval along with revised Design and Operations Report and all supporting information.

Record Keeping

7.5 For each operating day, the Company shall maintain a daily log that shall include the following information at a minimum:

- a. date;
- b. types (waste class and primary characteristic), quantities and source of waste received;
- c. a record of any waste refusals including the reasons for refusal and actions taken
- d. types and quantities of waste processed that day;
- e. quantities and destination of each type of waste shipped from the Site;
- f. a reconciliation of the amount of unprocessed, processed and residual waste present on the Site at the end of that operating day.

7.6 In addition to the requirements of Condition 7.5, the Company shall maintain a record tracking the path of waste movement through the Site for waste subject to Land Disposal Requirements, including as a minimum;

- a. date of receipt of the waste, including manifest number;
- b. waste class and waste characteristic;
- c. volume or mass of waste received; and
- d. date and location of off-site disposal of the waste, including the manifest number.

7.7 The Company shall maintain a record of inspections completed in accordance with Condition 3.13. The record shall include, at a minimum:

- a. name and signature of trained personnel conducting the inspection;
- b. date and time of the inspection;
- c. list of equipment inspected and all deficiencies observed;
- d. recommendations for remedial action to correct deficiencies; and

e. date deficiencies were addressed.

7.8 The Company shall maintain a record of preventative maintenance work completed in accordance with Condition 3.14. The record shall include, at a minimum:

- a. name and signature of person conducting the maintenance work;
- b. date and time that maintenance work was completed;
- c. equipment or part of equipment on which maintenance work was performed;
- d. the type of maintenance work performed; and
- e. date of next scheduled maintenance work.

7.9 The Company shall maintain a record of all spills or upset that occur at the Site. The record shall include, at a minimum:

- a. date and time of spill/upset;
- b. the nature of the spill or upset;
- c. the clean-up action taken;
- d. details of notification of authorities (if necessary); and
- e. action taken to prevent future occurrences.

7.10 The Company shall maintain a record of employee training. The records shall include, at a minimum:

- a. date
- b. employee name
- c. type of training received
- d. name of person or organization that provided the training
- e. signatures of employee and training

Annual Report

7.11 By March 31st of each year, the Company shall prepare and submit to the District Manager, a report for the preceding calendar year. The report shall include the following as a minimum:

- a. a yearly summary of volumes of all wastes processed at the Site including

incoming waste, outgoing materials and outgoing waste;

- b. any environmental and operational problems, that might negatively affect the environment, encountered during the operation of the Site and any mitigative actions taken;
- c. a statement as to compliance with all Conditions of this Approval and with the inspection and reporting requirements of the Conditions; and
- d. any recommendations to minimize impacts and improve Site operations and monitoring programs.

PART 8 - CLOSURE

8.1 The Company must submit, for approval by the District Manager, a written Closure Plan for the Site, four (4) months prior to closure of the Site. This Closure Plan must include, as a minimum, a description of the work that will be done to facilitate closure of the Site and a schedule for the completion of the work.

8.2 Within ten (10) days after closure of the Site, the Company must notify the Director, in writing, that the Site is closed and that the Site Closure Plan has been implemented.

Part 9 - ASBESTOS WASTE

9.1 All asbestos waste at the Site shall be managed in accordance with the EPA and Reg. 347 (specifically, but not limited to, Section 17 of Reg. 347), unless otherwise specified in the conditions of this Approval.

9.2 The Owner shall ensure that all asbestos waste received at or shipped from the Site is transported using a waste management system approved to transport asbestos waste.

9.3 (1) The Owner shall ensure that all asbestos waste received and stored at the Site is enclosed in six-mil polyethylene bags free from punctures, tears or leaks. Any bag which is deficient shall be immediately over-packed in a six-mil polyethylene bag.

(2) All asbestos waste received at the Site shall be stored in a secure manner inside a locked storage container. The container shall be covered when not in use.

(3) The total amount of asbestos waste on-site at any one time shall not exceed 15 tonnes.

(4) No other waste shall be stored with asbestos waste.

(5) Both sides of every asbestos waste container on-site shall be labelled with the word "CAUTION" in large, easily legible letters not less than ten (10) centimetres in height in a colour that contrasts with the background colour, and with the following words:
"CONTAINS ASBESTOS FIBRES"

Avoid Creating Dust and Spillage
Asbestos May be Harmful To Your Health
Wear Approved Protective Equipment"

(6) No waste storage container shall be placed within 1.2 metres of the property line.

9.4 The Owner shall ensure that:

(1) if there are any punctures, tears or leaks in any bag containing asbestos waste, any person handling asbestos waste or supervising the handling of that waste shall wear protective clothing and personal respiratory equipment while doing so;

(2) protective clothing that has been or is suspected of having been in contact with asbestos waste is disposed of as asbestos waste; and

(3) no disposable protective clothing is reused.

9.5 The Owner shall ensure that every person involved in the handling or management of asbestos waste is trained in the handling and clean-up asbestos waste, and shall take all precautions necessary to prevent asbestos waste from becoming airborne.

9.6 (1) In addition to the requirements of Condition 3.13, the Owner shall conduct a daily inspection of the asbestos storage areas to ensure that no asbestos waste becomes airborne, or otherwise enters the natural environment, as a result of the following:

(i) improper storage;

(ii) loss of integrity or damage to containment vessels;

(iii) exposure to weather; and

(iv) exposure to fire or fire hazards.

(2) Any deficiencies encountered during the daily inspections shall be recorded and promptly corrected to mitigate any possible impacts.

9.7 No asbestos waste shall remain at the Site for longer than thirty (30) days from the date of receipt. Any asbestos waste stored for more than thirty (30) days shall be immediately shipped from the Site in accordance with the requirements of this Approval.

9.8 The Owner shall ensure that asbestos spill and safety equipment is available and maintained in good working order at the Site, including (but not limited to) a shovel, a broom, wetting agent, protective clothing, a supply of six-mil polyethylene bags, bag closures, NIOSH-approved respiratory equipment for protection against asbestos fibers, a HEPA vacuum, and negative air units.

9.9 (a) The Owner shall ensure that all asbestos waste shipped from the Site shall be transported directly to a site approved to accept asbestos waste for final disposal, and not to a site where final disposal of the waste will not take place.

(b) The Owner shall ensure that all asbestos waste leaving the Site is packaged in accordance with the Act and Reg. 347, and in a manner which is acceptable to the receiving site.

(c) Before shipping any asbestos waste from the Site, the Owner shall notify the

receiving site of the shipment's anticipated time of arrival.

9.10 As per Section 25(2)(h) of the Occupational Health and Safety Act, enforced by the Ontario Ministry of Labour, the Owner shall take every precaution reasonable in the circumstances for the protection of a worker from exposure to asbestos in the workplace.

SCHEDULE "A"

This Schedule "A" forms part of Environmental Compliance Approval No. A620200.

1. Environmental Compliance Approval application, signed by Mr. Andrew Harvey, General Manager, dated April 25, 2017.
2. CDS Environmental Services, Design and Operations Report, prepared by TAF Industrial Consulting, dated July 7, 2017.
3. Environmental Compliance Approval application, signed by Mr. P. Scott Welles, President, CDS Environmental Services, dated June 12, 2018.
4. CDS Environmental Services, Design and Operations Report, prepared by Cyanide Destruct Systems Inc., dated October 2018.
5. Environmental Compliance Approval application, signed by Mr. P. Scott Welles, President, CDS Environmental Services, dated September 19, 2018.
6. CDS Environmental Services, Design and Operations Report Solidification/Bulding and Transfer Building, prepared by Cyanide Destruct Systems Inc., dated December 2018.
7. Environmental Compliance Approval application dated October 26, 2020 for an increase in the amount of liquid waste that may leave the Site on any one day, including all supporting documentation.
8. Environmental Compliance Approval application dated March 3, 2021 for the addition of a storage tank for the storage of wastewaters, including all supporting documentation.
9. Emails dated June 7, 2021 and June 8, 2021 from Michael Sadowski, Apex Environmental Services Inc., to Andrew Neill, P.Eng., MECP, with information on a change in tank design to one 33,300 litre double-walled tank.

Schedule "B"

The following Schedule "B" forms part of Environmental Compliance Approval No. A620200.

CDS Tankage List

| FUNCTION | VOLUME | CONTENTS | TANK ID |
|-----------------|---------------|-----------------|----------------|
|-----------------|---------------|-----------------|----------------|

| | (litres) | | |
|---------------------|-----------------|-------------------------|----|
| Hydrolysis effluent | 8100 | Ammonium hydroxide | L |
| Scrubber water | 950 | Water | M |
| Raw storage | 13250 | Cyanide feed | O |
| Bulk cyanide | 30300 | Cyanide solution | P |
| Filter press feed | 3400 | Ammonium hydroxide | Q |
| Filtrate sump | 750 | Ammonium hydroxide | R |
| Surge | 9000 | Water | T |
| Final effluent | 30000 | Ammonium hydroxide | W |
| Final effluent 2 | 19000 | Ammonium hydroxide | W1 |
| Silver recycling | 1900 | Ag Cn | D |
| Gold cell 1 | 1400 | Au Cn | E1 |
| Gold cell 2 | 500 | Au Cn | E |
| Gold strip | 500 | Au Cn | F |
| Gold strip | 500 | Au Cn | G |
| Gold rinse | 500 | Au Cn | H |
| Barrel wash 1 | 750 | Cyanide and water | U |
| Barrel wash 2 | 750 | Cyanide and water | U |
| Barrel wash 3 | 750 | Cyanide and water | U |
| Barrel wash 4 | 750 | Cyanide and water | U |
| Barrel wash 5 | 750 | Cyanide and water | U |
| Water | 750 | Water | T |
| Cooling water | 6450 | Water | N |
| Reactor 1 | 950 | Process | K |
| Reactor 2 | 950 | Process | J |
| Reactor 3 | 1900 | Process | I |
| Storage tank | 9500 | Liquid industrial waste | 1 |
| Storage tank | 10000 | Liquid industrial waste | 2 |
| Storage tank | 10000 | Liquid industrial waste | 3 |
| Storage tank | 33300 | Wastewater | B1 |

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

The reason for Condition 1.1 is to clarify that the previously issued Environmental Compliance Approval No. A620200, issued September 5, 2017, and all Notices of Amendment are no longer in effect and have been replaced and superseded by the Terms and Conditions stated in this Approval.

The reason for Conditions 1.2 and 7.11 is to ensure that the Site is operated in

accordance with the application and supporting documentation submitted by the Company, and not in a manner which the Director has not been asked to consider.

The reason for Conditions 1.3, 1.4, 1.5, 1.6 and 1.7 is to clarify the legal rights and responsibilities of the Company.

The reason for Condition 1.8 is to ensure that appropriate Ministry staff have ready access to the Site for inspection of facilities, equipment, practices and operations required by the conditions in this Approval. This condition is supplementary to the powers of entry afforded a Provincial Officer pursuant to the EPA and OWRA.

The reason for Conditions 1.9 and 1.10 is to clarify how to interpret the Approval in relation to the application and supporting documentation.

The reason for Condition 1.11 is to clearly identify correspondence that pertains to this Approval.

The reasons for Condition 1.12 is to ensure that the Site is operated under the corporate name which appears on the application form submitted for this approval and to ensure that the Director is informed of any changes.

The reason for Condition 1.13 is to ensure that subsequent owners are informed of the terms and conditions of this Approval. This condition also applies to all supporting documentation listed in Schedule "A".

The reason for Condition 1.14 is to ensure that the Company is aware of the obligations regarding the release of information under the Freedom of Information Act.

The reason for Condition 2.1 is to ensure that sufficient funds are available to the Ministry to clean up the Site in the event that the Company is unable or unwilling to do so.

The reason for Condition 3.1 is to specify the types of waste that may be accepted at the Site, based on the Company's application and supporting documentation.

The reasons for Condition 3.2 is to specify the approved service area from which waste may be accepted at the Site, based on the Company's application and supporting documentation.

The reason for Condition 3.3 is to specify the amounts of waste that may be received and stored on Site, based on the Company's application and supporting documentation.

The reason for Conditions 3.4, 3.5, 3.11, 3.12, 3.14 and 5.1 to ensure that the Site is operated in a manner which does not result in a nuisance or a hazard to the health and safety of the environment or people.

The reason for Condition 3.6 is to specify the hours of operation for the Site, based on the Company's application and supporting documentation.

The reason for Condition 3.7 is to ensure the controlled access and integrity of the Site by preventing unauthorized access.

The reason for Conditions 3.8 and 3.10 is to ensure that all wastes are properly classified so that they are managed, processed and disposed in accordance with Regulation 347, R.R.O. 1990 and in a manner that protects the health and safety of people and the public.

The reason for Condition 3.9 is to clarify that only the types of waste activities that have been included in the Company's application and supporting documentation are approved to take place at this Site.

The reason for Condition 3.15 and 3.16 is to make sure the proposed new building will be built within 5 years from the approval date.

The reason for Conditions 4.1 and 4.2 is to ensure that the Site is operated by properly trained staff.

The reason for Condition 5.2, 5.3 and 5.4 is to ensure that an Emergency Response Plan is developed and maintained at the Site.

The reason for Condition 5.5 is to ensure that equipment is available and functioning when needed.

The reason for Condition 6.1 is to ensure that any complaints regarding Site operations at the Site are responded to in a timely manner.

The reason for Condition 7.1 is to ensure that detailed records of Site activities are maintained for inspection and information purposes.

The reason for Conditions 7.2, 7.3 and 7.4 is to ensure that the Site has a manual that documents the procedures governing the safe operation of the Site.

The reason for Conditions 7.5, 7.6, 7.7, 7.8, 7.9 and 7.10 is to ensure that accurate records are kept to demonstrate compliance with this Approval.

The reason for Condition 8.1 is to ensure that the Site is closed in accordance with Ministry standards and to protect the health and safety of the public and the environment.

The reason for Condition 8.2 is to trigger the revocation of this Approval.

The reason for Conditions 9.1, 9.2, 9.3, 9.4, 9.5, 9.6, 9.7, 9.8, 9.9 and 9.10 is to ensure that all asbestos waste received, stored and shipped from the Site is managed in a manner which does not result in a nuisance or hazard to the health and safety of the public, company staff and the environment.

Upon issuance of the environmental compliance approval, I hereby revoke Approval No(s). A620200 issued on November 25, 2019

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 23rd day of July, 2021

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

AN/

c: District Manager, MECP Barrie
Michael Sadowski, Apex Environmental Services