

AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 4596-6B8LBZ

Issue Date: November 28, 2021

EACOM Timber Corporation
1100 René-Levesque Blvd W, No. 2110
Montreal, Quebec
H3B 4N4

Site Location: Ostrom Mill Site
Parcel 30-454SWS Parts 1 to 7
Westbrook Unorganized Township, District of Sudbury
P0M 2L0

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:

for the use and operation of a 5.7 hectare landfill (North and South Landfills) within a 35 hectare total site area, to be used for the landfilling of the following types of waste: slag/ash, woodwaste and soil. The site will have a final capacity of 212,000 cubic meters.

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

"Approval" or "ECA" means this entire provisional Environmental Compliance Approval document, issued in accordance with Section 20.3 of the EPA, and includes any schedules to it, the application and the supporting documentation listed in schedule "A";

"CAZ" means the Contaminated Attenuation Zone as defined in O. Reg. 232/98;

"Director " means any Ministry employee appointed by the Minister pursuant to Part II.1 of the Environmental Protection Act, as amended;

"District Manager" means the District Manager in the Timmins District Office of the Ministry;

"EPA " or "Act" means Environmental Protection Act, R.S.O. 1990, c. E. 19, as amended from time to time;

"**Ministry**" or "**MECP**" refers to the Ontario Ministry of the Environment, Conservation and Parks;

"**O. Reg. 232/98**" means Ontario Regulation 232/98 Landfill Sites made under the EPA, as amended from time to time;

"**Owner**" and "**Operator**" means EACOM Timber Corporation, including its officers, employees, agents or contractors;

"**OWRA**" mean the Ontario Water Resource Act, R.S.O 1990, Chapter O.40"Point of Compliance" means the boundary at which MOE Guideline B-7 shall be evaluated;

"**Regulation 347**" means Regulation 347 R.R.O. 1990;

"**Reasonable Use Guideline**" means the Ministry Guideline B-7 entitled "Incorporation of the Reasonable Use Concept into MOE Groundwater Management Activities, dated April 1994;

"**Site**" means the North and South Landfills at Gogama Forest Products Inc. Ostrom Mill Yard.

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

TERMS AND CONDITIONS

GENERAL

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 Application for a Certificate of Approval for a Waste Disposal Site dated July 29, 1999, and supporting documentation, and plans and specifications listed in Schedule "A".
2. The requirements specified in this ECA are the requirements under the EPA. The issuance of this ECA in no way abrogates the Owner's legal obligations to take all reasonable steps to avoid violating other applicable provisions of this legislation and other legislation and regulations.
3. The requirements of this ECA are severable. If any requirement of this ECA, or the application of any requirement of this ECA to any circumstance, is held invalid, the application of such requirement to other circumstances and the remainder of this ECA shall not be affected in any way.
4. The Owner shall ensure compliance with all the terms and conditions of this ECA. Any non-compliance constitutes a violation of the EPA and is grounds for enforcement.
5. a) The Owner shall, forthwith upon request of the Director, District Manager, or Provincial Officer (as defined in the Act), furnish any information requested by such persons with respect to compliance with this ECA, including but not limited to, any records required to be kept under this ECA; and

- b) In the event the Owner provides the Ministry with information, records, documentation or notification in accordance with this ECA (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 Owner, or to require the Owner to take any action, under this ECA 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 Owner relating to the Information, amounting to nonute or regulation.

6. The Owner 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, as amended from time to time, of any place to which this ECA relates; and,

without restricting the generality of the foregoing, to:

- b)
 - (i) enter upon the premises where the records required by the conditions of this ECA are kept;
 - (ii) have access to and copy, at reasonable times, any records required by the conditions of this ECA;
 - (iii) inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations required by the conditions of this ECA; and
 - (iv) sample and monitor at reasonable times for the purposes of assuring compliance with the conditions of this ECA.

7. a) Where there is a conflict between a provision of any document referred to in Schedule "A", and the conditions of this ECA, the conditions in this ECA 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.

8. The Owner shall ensure that all communications/correspondence made pursuant to this ECA includes reference to the ECA number.

9. The Owner shall notify the Director in writing of any of the following changes within thirty (30) days of the change occurring:
- a) change of Owner or Operator of the Site or both;
 - b) change of address or address of the new Owner;
 - c) change of partners where the Owner or Operator 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;
 - d) any change of name of the corporation where the Owner or operator 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. Reg. 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
 - e) change in directors or officers of the corporation where the Owner or Operator 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 9(d), supra.
10. In the event of any change in ownership of the Site, the Owner shall notify, in writing, the succeeding owner of the existence of this ECA, and a copy of such notice shall be forwarded to the Director.
11. Any information relating to this ECA 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.
12. All records and monitoring data required by the conditions of this ECA must be kept on the Owner's premises for a minimum period of two (2) years from the date of their creation.
13. (1) Pursuant to Section 197 of the EPA, no person having an interest in the Site shall deal in any way with the Site without first giving a copy of this ECA to each person acquiring an interest in the Site as a result of the dealing.
- (2) Two copies of a completed Certificate of Registration, containing a registerable description of the Site, shall be submitted to the Director for the Director's signature within 60 calendar days of the date of this ECA.
- (3) The Certificate of Registration shall be registered in the appropriate land registry office on title to the Site by the Owner within 10 calendar days of receiving the Certificate of Registration signed by the Director, and a duplicate registered copy shall be submitted to the Director.

Closure North Landfill

14. The closure of the North Landfill Site shall be completed in accordance with Items 8 through 9 in Schedule "A".
15. Within 120 days of completion of the final cover construction, the Owner shall submit to the District Manager, a construction report detailing the construction activities and any design changes made during construction. The report shall include but not be limited to the following topics:
 - i. drawing(s) of the "as-built" final cover;
 - ii. a description of the various construction stages;
 - iii. quality assurance/control measures for the construction; and
 - iv. any changes to the design.

Site Operations

16. The Site shall only receive non-hazardous solid industrial waste, limited to slag, ash, soil and wood waste generated at the Site.
17. The final volumetric capacity of the site , excluding final cover is **212,000** cubic meters.
18. Approval is hereby granted to operate and maintain the Site in accordance with the documents listed in Schedule "A".
19. Any changes to the Site Design and Operation Manual shall be submitted to the Director for approval prior to their implementation.
20. The Owner shall ensure the site is adequately secured to prevent unauthorized entry.
21. All buildings located on Site shall be equipped with methane detection alarms.

Contaminant Attenuation Zone and Well Installation

22. a. By no later than **April 30, 2022**, the Owner shall acquire the land or groundwater rights from the Crown and obtain agreement from CN Rail to establish the Contaminant Attenuation Zone ("CAZ") detailed in the report titled "Re-evaluation of the Contaminant Attenuation Zone Report for EACOM's Gogama Mill Wood Waste Landfill Site" dated July 2018 and prepared by Environmental Ecosystems Inc.
- b. If the land/groundwater rights and CN agreement have not been acquired by the date specified in Condition 22(a) of this ECA, the Owner shall submit a remedial action plan to the Director to prevent off-site migration of landfill leachate impacted groundwater by no later than **May 31, 2022**.
23. Thirty (30) days after the CAZ has been purchased and established, the Owner shall, in consultation with

the Ministry, submit a report to the Director and District Manager detailing new, proposed groundwater monitoring wells to be incorporated into the Environmental Monitoring Program to effectively determine compliance with the Reasonable Use Guideline.

Environmental Monitoring and Reporting

24.
 - i. Groundwater and surface water monitoring shall be undertaken by the Owner in accordance with the environmental monitoring program set out in Schedule "B".
 - ii. The Owner shall ensure that a leachate monitor is installed and added to the monitoring program for the purpose of leachate characterization.
 - iii. The Owner shall ensure that the monitoring well MW-9 is replaced with a new monitoring well which shall be added to the monitoring program.
25. The Owner shall ensure that methane gas is regularly monitored in any on-site buildings.
26. Any proposed changes to the report/monitoring program, including the frequency of submission, shall be submitted to the District Manager in writing for acceptance. Acceptance by the District Manager is required prior to implementation of these changes.
27. In the event that new sampling locations are added to the program, the Owner shall notify the District Manager in writing no later than 7 days after the sampling that the location(s) have been added to the sampling program.
28. The Owner shall ensure that a long-term surface water monitoring plan for the Site is submitted to and approved by the Director, with copies to the District Manager. The plan shall include, but shall not be limited to the following:
 - i. sampling locations;
 - ii. analytical parameters; and
 - iii. field measurements (i.e. flow, direction, pH, temperature, conductivity).

Trigger Mechanisms and Contingency Plans

29. The document entitled "Leachate Contingency Plan and Trigger Mechanisms" dated March 2010 and prepared by DST Consulting Engineers, amended to this ECA as Item (19) of Schedule "A" is hereby approved and incorporated into the Site's environmental monitoring program and trigger criteria exceedance response procedures detailed in this ECA.
30. In the event of a confirmed exceedance of a site-specific trigger level relating to leachate mounding or groundwater or surface water impacts due to leachate at the site's CAZ limit, the Owner shall immediately notify the District Manager, and an investigation into the cause and the need for implementation of remedial or contingency actions shall be carried out by the Owner in accordance with

the approved trigger mechanisms and associated contingency plans.

31. If monitoring results, investigative activities and/or trigger mechanisms indicate the need to implement contingency measures, the Owner shall ensure that the following steps are taken:
 - a.) The Owner shall notify the District Manager, in writing of the need to implement contingency measures, no later than 30 days after confirmation that remedial action or implementation of the contingency plan is required;
 - b.) Detailed plans, specifications and descriptions for the design, operation and maintenance of the contingency measures shall be prepared and submitted by the Owner to the District Manager for approval; and
 - c.) The contingency measures shall be implemented by the Owner upon approval by the District Manager.
32. The Owner shall ensure that any proposed changes to the site-specific trigger levels for leachate impacts to the surface water or groundwater, shall be approved in advance by the Director via an amendment to this ECA.

Financial Assurance

33. Within sixty (60) days of the issuance of this ECA, the Owner shall submit to the Director, an updated Financial Assurance, as defined in Section 131 of the Act, in the amount of four hundred fifty-six thousand five hundred and sixty-two dollars (**CAD456,562**). This Financial Assurance shall be in a form acceptable to the Director and shall provide sufficient funds for the closure and long-term post closure maintenance, monitoring, reporting and care of the Site as well as any costs for contingency measures and project management.
34. Commencing on April 30, 2025 and at intervals of three (3) years thereafter, the Owner shall submit to the Director, a re-evaluation of the amount of Financial Assurance to implement the actions required under Condition 34. The re-evaluation shall include an assessment based on any new information relating to the environmental conditions of the Site and shall include the costs of additional monitoring and/or implementation of contingency plans required by the Director upon review of annual reports. The Financial Assurance must be submitted to the Director within thirty (30) days of written acceptance of the re-evaluation by the Director.
35. The amount of Financial Assurance is subject to review at any time by the Director and may be amended at his/her discretion. 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 by the date the Financial Assurance terminates, the Financial Assurance shall forthwith be replaced by cash until such time as it can be replaced with another form of Financial Assurance acceptable to the Director.

Site Closure

36. (a) The Owner must submit, for approval by the Director, a written Closure Plan for the Site at least

twelve (12) months prior to closure of the Site. This 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 completion of that work; and

- (b) Within ten (10) days after closure of the Site, the Owner must notify the Director, in writing, that the Site has been closed in accordance with the approved Closure Plan.

Spill Reporting

- 37. In case of an emergency or a spill at the site, the Owner shall call the Ministry's Spills Action Centre at (416) 325-3000 or 1-800-268-6060 or the District Office forthwith.
- 38. Emergencies and/or spills shall be recorded in a written log or an electronic file format, referred to in Condition (37) of this ECA, as to the nature of the spill or upset, and the action taken for clean-up, correction and prevention of future occurrences.

Record Keeping

- 39. The Owner shall establish and maintain a written record of all environmental emergency situations at the Site. This record shall be in the form of a log or a dedicated electronic file and it shall include, as a minimum, the following information:
 - a) type of the emergency situation and the resulting environmental impact;
 - b) actions taken to address the impact; and
 - c) actions taken to prevent the re-occurrence of a similar emergency situation in the future.
- 40. The Owner shall establish and maintain a written record of complaints received about the site. This record shall be in the form of a log or a dedicated electronic file and it shall include, as a minimum, the following information:
 - a) date and time of any complaints received at the Site and their nature;
 - b) name, address and telephone number of the complainant;
 - c) nature of the complaint;
 - d) date and description of any remedial actions taken to address the received complaints; and
 - e) actions taken to prevent the re-occurrence of a similar incident, in the future.
- 41. The Owner shall establish and maintain a written record of the site inspections. This record shall be in the form of a log or a dedicated electronic file and it shall include, as a minimum, the following information:
 - a) date and time of inspection;
 - b) name, title and signature of personnel conducting the inspection; and

- c) a listing of all equipment, fencing, signs, etc. inspected and any deficiencies observed; and
- d) recommendations for remedial action and the completion date of such action.

42. The Owner shall retain at the Site Office for a minimum of two (2) years from the date of their creation, or longer if requested in writing by the District Manager, all records and information relating to or resulting from the activities approved under this ECA, and shall make all records and information available at all times for inspection by a Provincial Officer.

Staff Training

43. The Owner shall ensure that all operators at the Site have been trained with respect to:
- (a) the terms, Conditions and operating requirements of this ECA;
 - (b) the operation and management of all transfer, process, storage and contingency measures equipment;
 - (c) any environmental concerns pertaining to the Site and wastes to be transferred/processed; and
 - (d) relevant waste management legislation and Regulations under the Act and Ontario Water Resources Act.

Surface Water Monitoring Program

44. Surface water monitoring shall be undertaken by the Owner in accordance with the surface water monitoring program set out in Schedule "B" as amended.

Waste Reclamation

45. The Owner may conduct waste reclamation operations as per Item (16) of Schedule "A" and in accordance with the following sub-conditions:
- 45.1 No waste shall be reclaimed from the Site unless a site supervisor or attendant trained in the requirements of this ECA is present and supervises the operations during operating hours.
 - 45.2 Waste reclamation operations including, but not limited to, excavation and transport, shall only be conducted at the Site between the hours of 6:00 a.m. to 8:00 p.m. and only at times when a adequately trained Site Supervisor is present to oversee the operations at the Site.
 - 45.3 Waste reclamation operations, including management, excavation and transfer of all waste, shall in accordance with the EPA, Regulation 347, and the conditions of this

ECA. At no time shall the discharge of a contaminant that causes or is likely to cause an adverse effect be permitted.

- 45.4 Waste reclamation operations shall be conducted in a manner such that the vermin, vectors, dust, litter, odour, noise and traffic do not create a nuisance.
- 45.5 Newly generated woodwaste may be stockpiled within the landfill footprint on a temporary basis before removal. Woodwaste shall not be stockpiled for longer than one (1) year before removal from the Site.
- 45.6 All waste reclamation data including, but not limited to, volume of waste reclaimed from the Site, amount of newly generated woodwaste transferred from the Site and areas of the Site that have been closed in accordance with Condition 48 shall be included as part of the Annual report required in Condition 34 of this ECA.

Site Closure

- 46. The Site shall no longer landfill any waste. Newly generated woodwaste shall be processed and temporarily stockpiled for a maximum of one (1) year before transfer from the Site as per Condition 45.5 of this ECA.
- 47. The wood waste processing pad to be constructed within the footprint of south landfill area in accordance with the Updated Operational Plan (Item 23 of Schedule "A") shall be properly graded and covered with gravel to minimize odour, dust, erosion and surface water ponding.
- 48. All parts of the Site to be closed shall be capped with a minimum of 600 millimetres low permeable silt or clay, 150 millimetres of topsoil and vegetation.

Annual Report:

- 49. By every April 30, the Owner shall submit, to the District Manager, two (2) copies of an annual report covering the previous calendar year. The report shall be prepared by a qualified engineer, hydrogeologist and surface water specialist. The report shall contain, but is not limited to, the following information:
 - a) a summary of type and quantity of incoming waste accepted during the reporting period;
 - b) a summary of total amount of waste received at the site, remaining capacity and remaining life expectancy of the Site;
 - c) a summary of the site's operation procedure and compliance as per the Design and Operation Plan;
 - d) a copy of the borehole logs
 - e) a section of text describing the landfill's hydrogeologic setting;
 - f) a water table contour map;
 - g) a location map illustrating the site relative to nearby potentially sensitive groundwater

- and/or surface water features;
- h) a Site Plan(s) illustrating the approved landfill footprint;
 - i) Stratigraphic cross-sections which clearly illustrate the subsurface distribution of geological materials;
 - j) Sampling protocols, and a description of any problems encountered during the sampling events which may have impacted the reliability of analytical results;
 - k) The data shall be interpreted by the author(s) and presented in a form that is easy to follow. All analytical results for all parameters shall be presented in tabular form and shown in time trend graphs. The tabulated data shall include the applicable assessment criteria. Trends of ground water quality must be presented graphically on Piper or Durov plots and interpreted
 - l) The report shall include an assessment of the monitoring data with respect to the reasonable use policy. The report should also identify expected and worst-case impacts;
 - m) The report shall include a comparison of the results of surface water sampling to the PWQOs or Interim PWQOs described in Water Management, MOEE, July 1994, as amended from time to time;
 - n) A discussion on the contaminated attenuation zone and the adequacy of the area for attenuation;
 - o) A discussion on the surface water discharge from the drainage ditches located on the site.
 - p) QA/QC protocol must be described; and
 - q) The report shall have the conclusions and recommendations of the author(s), especially as they concern future sampling parameters, frequency and protocol.

Schedule "A"

This Schedule forms part of ECA No. A740207

1. Application for a Certificate of Approval for a Waste Disposal Site, dated July 29, 1999 and signed by L. Whyte, Manager, Environmental Division, Gogama Forest Products Ltd.
2. Document entitled "Design and Operations Report, Gogama Forest Products Ltd." dated July 1999 and prepared by NAR Environmental Consultants Inc.
3. Document entitled "Hydrogeologic and Surface Water Assessment, Gogama Forest Products Ltd. dated February 1999 and prepared by NAR Environmental Consultants Inc.
4. Letter from I. Parrott, MOE to L. Whyte, Gogama Forest Products Ltd. dated September 23, 1999 Re: Request for Additional Information.
5. Articles of Incorporation from Gogama Forest Products Ltd. dated April 29, 1988.
6. Fax Transmission from G. Duhemel, Gogama Forest Products Ltd. to I. Parrott, MOE dated December 9, 1999 Re: Revised EBR Abstract and Adjacent Neighbour Notification.
7. Fax Transmission from Blair Rittia, William Day Construction to D. Gable, MOE dated April 6, 2005 that providing a copy of the transfer of land over to Gogama Forest Products Ltd.
8. Letter dated June 14, 2006 addressed to Mr. Blair Rittia, Gogama Forest Products Ltd. from Mr. Dale Gable, Ministry of the Environment requesting additional information on the closure of the North Landfill pertaining to slopes, final cover and monitoring.
9. Letter and supporting documentation dated June 27, 2006 addressed to Mr. Dale Gable, Ministry of the Environment providing information on final cover, slopes and monitoring. The supporting documentation included the following report:
 - i. Report entitled "Closure Plan - North Landfill Ostrom Mill Yard - Gogama Forest Products" prepared for Gogama Forest Products Ltd by DST Consulting Engineers dated March 2005 and revised June 27, 2006
10. Revised Surface monitoring plan, Gogama Forest Products, Inc., Ostrom Mill Site, Parcel 30-454SW, Parts 1 to 7, Westbrook Unorganized Township, District of Sudbury, ON. prepared by DST Consulting Engineering Inc. dated August 28, 2008.
11. Financial Assurance Re-evaluation dated March 23, 2010, prepared by DST and submitted to David W. Lee, MOE, incorporating comments and recommendations provided by Mr. Lee.
12. Financial Assurance Re-evaluation dated April 23, 2010, prepared by DST and submitted to David W. Lee, MOE, incorporating comments and recommendations provided by Mr. Lee.

13. E-mail dated May 31, 2010 from David Lee, MOE to Lee Stach, DST regarding comments on Item (12) of Schedule "A".
14. Financial Assurance Re-evaluation dated May 31, 2010, prepared by DST and submitted to David W. Lee, MOE, incorporating comments and recommendations provided by Mr. Lee.
15. Letter dated July 27, 2010, from Livia Wei, Application Officer, Environmental Assessment and Approvals Branch, Ministry of the Environment to Mr. Jean-Francois Merette, EACOM Timber Corporation. Re: Ownership Change Request.
16. Report entitled "Application Package for Certificate of Approval Amendment (Waste Disposal Site) for Gogama Forest Products Inc." prepared by DST Consulting Engineers Inc. dated October 2010, and all attachments and appendices including but not limited to:
 - Financial Assurance Re-evaluation dated October 29, 2010, prepared by DST and submitted to David W. Lee, MOE, incorporating comments and recommendations provided by the Ministry.
17. Letter dated January 7, 2011 to David W. Lee, MOE from Lee Ann Stach, DST. Re: Re-evaluation of Financial Assurance.
18. Letter dated February 4, 2011 to David W. Lee, MOE from Manon Giroux, DST. Re: Comments of draft Notice of Amendment.
19. Report entitled "Gogama Forest Products Inc.: Leachate Contingency Plan and Trigger Mechanisms" dated March 2010 and prepared by DST Consulting Engineers for Domtar Inc. including all attached drawings, figures and appendices.
20. Report entitled "Determination of the Ostrom Mill Yard Contaminant Attenuation Zone" dated September 2010 and prepared by DST Consulting Engineers for EACOM Timber Corporation including all attached drawings, figures and appendices.
21. Environmental Compliance Approval application dated August 11, 2014, signed by Donald Drouin, Director, Sales and Environment, including all attached supporting information.
22. Report entitled "Re-evaluation of Financial Assurance for the Gogama Ostrom Mill Site" dated August 7, 2014 and prepared by Angela Rainville and Manon Giroux, Environmental Ecosystems Inc. including all attached supporting information.
23. Environmental Compliance Approval Application signed by Michael Leitch dated December 17, 2020, and the supporting documents including the report entitled "2020 Updated Operational Plan Gogama Mill Site Landfill Zero Waste Processing Pad" dated December 2020 prepared by Environmental Ecosystems Inc.

24. Email dated September 23, 2021 from Stephanie Parzei, EACOM to Rick Li, MECP providing a response to the ministry's comments on the contaminant attenuation zone acquisition and the waste processing pad construction.

Schedule "B"

This Schedule forms part of the ECA No. A740207. It describes the groundwater monitoring program referred to in Condition 24.

B.1. Groundwater and Leachate

B.1.1 Groundwater and Leachate Monitoring Program Objectives

The overall goal of the groundwater monitoring program is to detect and assess effects of the landfill on local water resources. The following objectives have been identified to achieve this goal:

- a) to monitor groundwater quality in the shallow groundwater system and the deeper confined groundwater system;
- b) to identify and characterize movement of leachate related contaminants in the systems;
- c) to evaluate the effectiveness of the attenuation zone; and
- d) to determine the need for implementation of contingency plans.

B.1.2 Monitoring Plan

The groundwater monitoring plan shall be carried out by the Owner to address the stated objectives and will include:

B.1.2.1 Landfill Monitoring Frequency

The groundwater monitoring program shall be conducted three times per year during the spring, mid-summer and fall.

B.1.2.2 Groundwater Monitor Sampling Locations

Table B-1 identifies the groundwater monitors sampling locations. If a monitoring well is dry or damaged then that well does not have to be sampled that sampling event. Static water levels shall be collected in all the groundwater monitors prior to purging and sampling:

Table B-1: Groundwater Sampling Locations

| | | |
|------|-----------------|------|
| MW-2 | MW-3 | MW-4 |
| MW-5 | MW-6 | MW-8 |
| MW-9 | LW | AW |
| LW | New Source Well | |

B.1.2.3 Analytical Parameters

The parameters which shall be measured in the field, along with the chemical and physical laboratory analyses which shall be collected on the groundwater samples from the groundwater monitors, shall include the

following:

Table B-2: Analytical Parameters

| | | |
|------------------------------------------|--------------------------|-----------|
| pH (field) | Magnesium | Aluminum |
| pH (lab) | Potassium | Boron |
| Temperature(field) | Sodium | Cadmium |
| Colour | Benzene | Chromium |
| Turbidity | Toluene | Cobalt |
| Conductivity (field) | Ethylbenzene | Copper |
| Conductivity (lab) | Xylene | Iron |
| Total Alkalinity (as CaCO ₃) | Phenols | Lead |
| Total Dissolved Solids | Dissolved Organic Carbon | Manganese |
| Total Suspended Solids | Biological Oxygen Demand | Nickel |
| Hardness | Chemical Oxygen Demand | Vanadium |
| Chloride | Ammonia | Zinc |
| Sulphate | Phosphorus (Total) | Mercury |
| Nitrate | Total Kjeldahl Nitrogen | Arsenic |
| Nitrite | | Barium |
| Calcium | | |

Note: BTEX parameters are only required for the new source well

B.1.2.4 Groundwater Monitor Inspections

Any groundwater monitoring well found to be damaged, not functioning or otherwise improperly maintained, shall be repaired or replaced within 12 months of being initially documented. The District Manager shall be notified prior to any well being replaced.

B.1.2.5 Groundwater Monitoring Protocols

Standard and/or generally accepted groundwater sampling (including well development, sample collection, storage and transport) and analytical protocols shall be adhered to during all groundwater monitoring sessions. Groundwater elevation measurements shall be of the static groundwater elevation within the groundwater monitoring well measured prior to well development.

B.1.2.6 Method Detection Limits

All laboratory analyses on groundwater samples shall be performed by an accredited analytical laboratory and the detection limits (MDLs) for the specific analyses should commensurate with the standards established in the current Ontario Drinking Water Standards.

B.2. Surface Water

B.2.1 Surface Water Monitoring Program Objectives

The primary goal of the Surface Water Monitoring Program is to monitor for any landfill-related impairment of surface water above Provincial Water Quality Objectives (PWQOs). Where the concentration of a specific parameter already exceeds the PWQO in background surface waters, the aim is to allow no further deterioration of surface water quality.

B.2.2 Monitoring Plan

The surface water monitoring plan shall be carried out by the Owner to address the stated objectives and will include:

B.2.2.1 Landfill Monitoring Frequency

The surface water monitoring program shall be conducted three times per year during the spring , mid summer and fall.

B.2.2.2 Surface Water Sampling Locations

Table B-2: Surface Water Sampling Locations

| | | |
|--------|-------|--------|
| SW 101 | SW102 | SW 103 |
| SW 104 | SW105 | |

B.2.2.3 Analytical Parameters

The parameters which shall be measured in the field, along with the chemical and physical laboratory analyses which shall be collected on the surface water samples, shall include the following:

Table B-3: Surface Water Analytical Parameters

| | | | |
|------------------------------|------------------------|--------------|---------------------|
| pH (field) | Chemical Oxygen Demand | Benzene | Barium |
| pH (lab) | Resin and Fatty Acid | Toluene | Aluminium |
| Temperature(field) | Chloride | Ethylbenzene | Boron |
| Conductivity (field) | Sulphate | Xylene | Cadmium |
| Conductivity (lab) | Nitrate | Phenols | Chromium |
| Total Kjeldhal Nitrogen | Nitrite | Turbidity | Cobalt |
| Dissolved Organic Carbon | Calcium | Colour | Tannins and lignins |
| Total Alkalinity (as CaCO3) | Magnesium | Conductivity | Copper |
| Total Dissolved Solids | Potassium | Arsenic | Iron |
| Total Suspended Solids | Sodium | Ammonia | Lead |
| Biochemical Oxygen Demand | Hardness | Phosphorous | Manganese |
| Nickel | Vanadium | Zinc | Mercury |

B.2.2.4 Surface Water Monitoring Protocols

Standard and/or generally accepted surface water sampling (sample collection, storage and transport) and analytical protocols shall be adhered to during all surface water sampling sessions.

B.2.2.5 Method Detection Limits

All laboratory analyses on surface water samples shall be performed by an accredited analytical laboratory and the detection limits (MDLs) for the specific analyses should commensurate with the standards established in the current Provincial Water Quality Objectives.

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

1. *The reason for Condition (1) 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.*
2. *The reason for Conditions (2), (3), (4), (7), (8), (9), (10), (11) and (12) is to clarify the legal rights and responsibilities of the owner.*
3. *The reason for Condition (5) and (6) is to ensure that the appropriate Ministry staff have ready access to information and the operations of the site which are approved under this ECA. Condition (6) is supplementary to the powers of entry afforded a Provincial Officer pursuant to the **Environmental Protection Act**, the **Ontario Water Resources Act**, and the **Pesticides Act**, as amended.*
4. *The reason for Condition (13) is included, pursuant to subsection 197(1) of the EPA, to provide that any persons having an interest in the Site are aware that the land has been approved and used for the purposes of waste disposal.*
5. *The reasons for Condition (14) is to ensure the Owner closes the North Landfill Site as per the submission. This is to ensure the long-term health and safety of the public and the environment.*
6. *The reason for Condition (15) is to ensure the Owner submits a report that details the construction of the site closure as the closure plan may be amended due to actual field conditions. Therefore, the submission of the report would provide the Ministry information pertaining to the changes.*
7. *The reasons for Condition (16) and (17) is to ensure that the types and quantities of waste being landfilled at the site are consistent with the application and the supporting documentation.*
8. *The reasons for Conditions (18), (19), (20), (21), (24), (25), (26), (27), and (28) is to ensure that the site is operated and maintained in a manner that protects the health and safety of the public and the environment.*
9. *The reasons for Conditions (22) and (23) is to facilitate the establishment of a Contaminant Attenuation Zone and the means to monitor its effectiveness via installation of new monitoring wells at the newly established compliance boundary..*

10. *The reasons for Condition (29), (30), (31), and (32) are added to ensure the owner has a plan with an organized set of procedures for identifying and responding to potential issues relating to groundwater and surface water contamination near or at the site's compliance point.*
11. *The reason for Conditions (33, (34) and (35) is to ensure that sufficient funds are available to the Ministry to clean up/closure of the site in the event that the Owner is unable or unwilling to do so.*
12. *The reason for Condition (36) 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.*
13. *The reasons for Condition (37) and (38) is to ensure that staff are properly trained in the operation of the equipment used at the Site and emergency response procedures. This will minimize the possibility of spills occurring and will enable staff to deal promptly and effectively with any spills that do occur.*
14. *The reason for Condition (39), (40), (41) and (42) is to ensure the owner maintains records.*
15. *The reason for Condition (43) is to ensure that staff are properly trained in the operation of the equipment used at the Site and emergency response procedures. This will minimize the possibility of spills occurring and will enable staff to deal promptly and effectively with any spills that do occur.*
16. *Condition 44 is added to incorporate the surface water monitoring program into the ECA. This is to ensure the long-term health and safety of the environment and the public.*
17. *The reasons for Condition (45) are to approve waste reclamation operations at the Site and to ensure the operations are conducted in an environmentally responsible manner and not in a manner which the Director has not been asked to consider.*
18. *The reason for Conditions (46) and (48) are to recognize the closure of the Site to future waste disposal and ensure the Site is progressively closed in a manner acceptable to the Ministry.*
19. *The reason for Condition (47) is to approve the construction of a wood waste processing pad within the landfill footprint and ensure the wood waste processing is conducted in a manner that minimizes nuisances.*
20. *The reason for condition (49) is to ensure that regular review of site development, operations and monitoring data is documented and any possible improvements to site design, operations or monitoring programs are identified. An annual report is an important tool used in reviewing site activities and for determining the effectiveness of site design.*

Upon issuance of the environmental compliance approval, I hereby revoke Approval No(s). 4596-6B8LBZ issued on May 4, 2020

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 28th day of November, 2021



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

RL/

c: District Manager, MECP Timmins
Stephanie.Parzei@eacom.ca, EACOM Timber Corporation