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Ministry of the Environment, Conservation and Parks
Ministère de l'Environnement, de la Protection de la nature et des Parcs

ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 7480-CC6LKX

Issue Date: March 11, 2022

Cintas Canada Limited
205 Turnbull Court
Cambridge, Ontario
N1T 1W1

Site Location: 205 Turnbull Court
Cambridge City, Regional Municipality of Waterloo
N1T 1W1

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) soil vapour extraction and treatment system, equipped with two (2) granular activated carbon vessels connected in series, discharging to the air at a volumetric flow rate of 0.17 cubic metre per second through a stack, having an exit diameter of 0.15 metre, extending 0.5 metre above the roof and 7.6 metres above grade.

all in accordance with the Application for Environmental Compliance Approval submitted by Cintas Canada Limited dated September 2, 2020 and signed by Michael Labocha, Engineer III - Chemical & Environmental Engineering and all supporting information prepared by Arcadis Canada, Inc., including the additional information provided by Wasef Jamil, P.Eng. (Arcadis Canada, Inc.) dated January 7, 2022.

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

1. "Annual Report" means a report containing the results of the *Monitoring Plan* implementation for the preceding year;
2. "Approval" means this Environmental Compliance Approval, including the application and supporting documentation listed above;
3. "Company" means Cintas Canada Limited that is responsible for the construction or operation of the Facility and includes any successors and assigns in accordance with section 19 of the EPA;
4. "District Manager" means the District Manager of the appropriate local district

office of the Ministry, where the Facility is geographically located;

5. "Emission Summary Table" means a table described in paragraph 14 of subsection 26 (1) of O. Reg. 419/05;
6. "EPA" means the *Environmental Protection Act*, R.S.O. 1990, c.E.19;
7. "Equipment" means the soil vapour extraction and treatment system 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 prepared in accordance with section 26 of O. Reg. 419/05 and the Procedure Document by Arcadis Canada, Inc., dated August 28, 2020 and signed by Wasef Jamil, submitted in support of the application including any addendum submissions made during the Ministry's review of the Company's application;
9. "Exhausted" means the capacity of the activated carbon media to adsorb emissions is reached and the GAC is no longer able to effectively reduce emissions;
10. "Facility" means the entire operation located on the property where the Equipment is located;
11. "GAC" means the two (2) granular activated carbon vessels;
12. "Manual" means a document or a set of documents that provide written instructions to staff of the Company;
13. "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;
14. "Monitoring Plan" means a written monitoring plan developed for the site as described in Condition 3 of this Approval;
15. "O. Reg. 419/05" means Ontario Regulation 419/05, Air Pollution – Local Air Quality, as amended;
16. "Procedure Document" means Ministry guidance document titled "Procedure for Preparing an Emission Summary and Dispersion Modelling Report" dated March 2018, as amended;
17. "Process" means the soil vapour extraction and treatment process as described in the Company's application, this Approval and in the supporting documentation submitted with the application, to the extent approved by this Approval;
18. "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;
19. "Remedial Work Plan" means the overall plan, developed for the site that contains

as a minimum the remedial objectives, an overview of the extent of contamination at the site and closure conditions to remove the Process and Equipment from the site;

20. "Soil, Groundwater and Sediment Standards" means the Ministry publication "Soil, Groundwater and Sediment Standards for Use Under Part XV.1 of the Environmental Protection Act" dated April 15, 2011, as amended;
21. "Supporting Documents" means the Ministry publications that accompany the Soil, Groundwater and Sediment Standards including "Guide for Completing Phase II Environmental Site Assessments under Ontario Regulation 153/04" dated June 2011, as amended; and
22. "Target Compounds" means the volatile organic compounds as described in the Company's application, this Approval and in the supporting documentation submitted with the application, to the extent approved by this Approval, that the Equipment is designed to treat.

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

TERMS AND CONDITIONS

1. PERFORMANCE REQUIREMENTS

1. The Company shall, at all times, design and operate the Process with the intent to reduce the soil/groundwater concentrations of the Target Compounds to comply with the appropriate criteria provided in the Soil, Groundwater and Sediment Standards, appropriate worker health and safety criteria, or site specific criteria developed in accordance with the Supporting Documents.
2. The Company shall, before commencement of operation of the Process at the site, prepare a Remedial Work Plan for the site.
3. The Company shall ensure that the noise emissions from the Facility comply with the limits set out in Publication NPC-300.
4. The Company shall ensure that the GAC maintains a removal efficiency greater than or equal to 80% for the Target Compounds.

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, before commencement of operation of the Process and Equipment, and update, as necessary, a Manual outlining the operating procedures and a maintenance program for the Equipment, including:
 - i. routine operating and maintenance procedures in accordance with good engineering practices and as recommended by the Equipment suppliers;
 - ii. procedures to inspect, test and replace the activated carbon media in the GAC before it is Exhausted;
 - iii. procedures to measure and maintain the removal efficiency of the Target Compounds by the GAC;
 - iv. procedures to prevent upset conditions and contingency measures;
 - v. emergency procedures, including spill clean-up procedures;
 - vi. procedures for any record keeping activities relating to the operation and maintenance of the Equipment; and
 - vii. all appropriate measures to minimize noise and odorous emissions from all potential sources;
- b. implement the recommendations of the Manual.

2. The Company shall ensure that the activated carbon media in the GAC is replaced before it is Exhausted.

3. MONITORING AND REPORTING

1. The Company shall submit to the District Manager, not later than two (2) months before commencement of operations at the site, a draft Monitoring Plan for the operation of the Process and Equipment at the site. The Monitoring Plan shall be designed in accordance with the Supporting Documents, for the soil vapour/groundwater at the site to document that the Performance Requirements outlined above are not exceeded and that the Remedial Work Plan Objectives are met. The finalized Monitoring Plan shall be implemented upon commencement of operations at the site and include, as a minimum, the following:
 - a. the Monitoring Plan objectives;
 - b. a list of analytical and/or indicator parameters;
 - c. operating parameters for the Process and Equipment;
 - d. procedures to monitor the removal efficiency of the GAC;
 - e. a methodology to measure the concentrations of contaminants in the gas discharging to the air;

- f. procedures for monitoring any potential off-site migration of the Target Compounds;
 - g. approximate monitoring locations and frequency; and
 - h. sampling methodology and QA/QC procedures, when applicable.
2. The Company shall submit, not later than **May 1, 2023** and each subsequent year thereafter, to the District Manager an Annual Report on the results of the Monitoring Plan implementation for the preceding year. Each Annual Report shall include, as a minimum, the following:
- a. an overview of the operation of the Process and Equipment;
 - b. the frequency and scope of the monitoring adopted;
 - c. a summary of the results of analytical and/or indicator parameters of the level of contamination at the site;
 - d. a trend analysis for the Target Compounds; and
 - e. an updated Emission Summary Table if monitoring results indicate that contaminant emission rates are higher than the original emission estimates described in the Company's ESDM Report.
3. The Company, upon submission of the second Annual Report, with approval from the District Manager, may amend the Performance Requirements and Monitoring and Reporting requirements of this Approval.

4. RECORD RETENTION

1. 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, and make these records available for review by staff of the Ministry upon request. The Company shall retain:
- a. all records on the maintenance, repair and inspection of the Equipment;
and
 - b. all records of any environmental complaints, including:
 - i. a description, time and date of each incident to which the complaint relates;
 - ii. wind direction at the time of the incident to which the complaint relates; and

- iii. a description of the measures taken to address the cause of the incident to which the complaint relates and to prevent a similar occurrence in the future.

5. NOTIFICATION OF COMPLAINTS

1. The Company shall notify the District Manager, in writing, of each environmental complaint within two (2) business days of the complaint. The notification shall include:
 - a. a description of the nature of the complaint;
 - b. the time and date of the incident to which the complaint relates; and
 - c. the actions taken to resolve the complaint and any recommendations for remedial measures.

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

1. Condition No. 1 is included to provide the minimum performance requirements considered necessary to prevent adverse effects.
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. Condition No. 3 is included to require the Company to gather accurate information so that compliance with the EPA, the regulations and this Approval can be verified.
4. Condition No. 4 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. 5 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.

In accordance with Section 139 of the *Environmental Protection Act*, you may by written notice served upon me, the Ontario Land 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 ("the Notice") shall state:

- a. The portions of the environmental compliance approval or each term or condition in the environmental compliance approval in respect of which the hearing is required, and;
- b. The grounds on which you intend to rely at the hearing in relation to each portion appealed.

The Notice should also include:

1. The name of the appellant;
2. The address of the appellant;
3. The environmental compliance approval number;
4. The date of the environmental compliance approval;
5. The name of the Director, and;
6. The municipality or municipalities within which the project is to be engaged in.

And the Notice should be signed and dated by the appellant.

This Notice must be served upon:

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 *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 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 <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 11th day of March, 2022

Nancy E Orpana, P.Eng.
Director
appointed for the purposes of Part
II.1 of the *Environmental
Protection Act*

RA/

c: District Manager, MECP Guelph
Wasef Jamil, Arcadis Canada Inc.