

**ENVIRONMENTAL COMPLIANCE APPROVAL**

NUMBER 2416-CD7KCT

Issue Date: April 25, 2022

Active Industrial Solutions Inc.  
2155 North Talbot Road  
Tecumseh, Ontario  
N9A 6J3

Site Location: 2155 North Talbot Road  
Tecumseh Town, County of Essex  
N9A 6J3

*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:*

- the equipment and associated exhaust systems listed in Schedule A;

all in accordance with the Application for Approval (Air & Noise) submitted by Active Industrial Solutions Inc., dated August 4, 2021 and signed by Vincent Sebastiano, CFO; the supporting information, including the Emission Summary and Dispersion Modelling Report, submitted by Dillon Consulting, dated July 2021 and signed by Douglas Gay, the Acoustic Assessment Report submitted by Dillon Consulting dated July 2021 and signed by Elham Alavi, and email updates provided by Douglas Gay on October 19 and 22, November 22, December 2, 2021, January 20, February 3, April 6, 7, 8, 19 and 21, 2022; and an email update provided by David Diemer of Dillon Consulting on December 2, 2021.

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

1. "Approval" means this Environmental Compliance Approval, including the application and supporting documentation listed above;
2. "Company" means Active Industrial Solutions Inc. that is responsible for the construction or operation of the Facility and includes any successors and assigns in accordance with section 19 of the EPA;
3. "Director" means a person appointed for the purpose of section 20.3 of the EPA by the Minister pursuant to section 5 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; namely a table in the ESDM Report that compares the Point of Impingement concentration for each Compound of Concern to the corresponding Ministry Point of Impingement Limit, Acceptable Point of Impingement Concentration, or Jurisdictional Screening Level;
6. "EPA" means the *Environmental Protection Act*, R.S.O. 1990, c.E.19;
7. "Equipment" means the equipment 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 most current Emission Summary and Dispersion Modelling Report that describes the Facility. The ESDM Report is based on the Original ESDM Report and is updated after the issuance of this Approval in accordance with section 26 of O. Reg. 419/05 and the Procedure Document;
9. "Facility" means the entire operation located on the property where the Equipment is located;
10. "Manager" means the Manager, Technology Standards Section, Standards Development Branch of the Ministry, or any other person who represents and carries out the duties of the Manager, as those duties relate to the conditions of this Approval.
11. "Manual" means a document or a set of documents that provide written instructions to staff of the Company;
12. "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;
13. "O. Reg. 419/05" means Ontario Regulation 419/05, Air Pollution – Local Air Quality, as amended;
14. "Original ESDM Report" means the Emission Summary and Dispersion Modelling Report which was prepared in accordance with section 26 of O. Reg. 419/05 and the Procedure Document by Douglas Gay / Dillon Consulting and dated July 2021 submitted in support of the application, and includes any changes to the report made up to the date of issuance of this Approval.
15. "Pre-Test Plan" means a plan for the Source Testing including the information required in Section 5 of the Source Testing Code.
16. "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.

17. "Source Testing" means sampling and testing to measure emissions resulting from operating the Targeted Sources under conditions which yield the worst case emissions within the approved operating range of the Targeted Sources which satisfies paragraph 1 of subsection 11(1) of O. Reg. 419/05.
18. "Source Testing Code" means the Ontario Source Testing Code, dated June 2010, prepared by the Ministry, as amended.
19. "Targeted Sources" means the sources listed in Schedule B.
20. "Test Contaminants" mean hexavalent chromium, nickel and cobalt.

*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. OPERATION AND MAINTENANCE

1. The Company shall ensure that the Equipment is properly operated and maintained at all times. The Company shall:
  - a. prepare, not later than three (3) months after the date of this Approval, 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. emergency procedures, including spill clean-up procedures;
    - iii. procedures for any record keeping activities relating to operation and maintenance of the Equipment;
    - iv. all appropriate measures to minimize noise and odorous emissions from all potential sources; and
    - v. the frequency of inspection and replacement of the filter material in the Equipment;
  - b. implement the recommendations of the Manual.
2. The Company shall operate the exhaust on the Plating Tank (Source S1) 24 hours a day, 7 days a week.

## **2. 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.

## **3. 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; and
  - b. the time and date of the incident to which the complaint relates.

## **4. NOISE**

1. The Company shall, at all times, ensure that the noise emissions from the Facility comply with the limits set out in Ministry Publication NPC-300.

## **5. SOURCE TESTING**

1. The Company shall perform Source Testing to determine the rates of emissions of the Test Contaminants from the Targeted Sources listed in Schedule B.
2. The Company shall submit, not later than three (3) months from the date of this Approval, to the Manager a Pre-Test Plan for the Source Testing required by the Source Testing Code. The Company shall finalize the Pre-Test Plan in consultation with the Manager.
3. The Company shall not perform Source Testing required under this Approval until the Manager has accepted the Pre-Test Plan.

4. The Company shall complete the Source Testing not later than three (3) months after acceptance of the Pre-Test Plan by the Manager, or within a period as directed or agreed by the District Manager.
5. The Company shall repeat the Source Testing for the sources and contaminants outlined in Schedule B as directed or agreed by the District Manager.
6. The Company shall notify the Director, the District Manager and the Manager in writing of the location, date and time of any impending Source Testing required by this Approval, at least fifteen (15) days prior to the Source Testing.
7. The Company shall submit a report, whenever Source Testing is completed, on the Source Testing to the Director, the District Manager and the Manager not later than three (3) months after completing the Source Testing, or within a period as directed or agreed by the District Manager. The report shall be in the format described in the Source Testing Code, and shall include, but not be limited to:
  - a. an executive summary;
  - b. records of weather conditions such as ambient temperature and relative humidity, wind speed and direction, and any environmental complaints if received, at the time of the Source Testing;
  - c. all operating conditions of the Facility including any upset conditions during the Source Testing;
  - d. results of the Source Testing;
  - e. results of Source Testing, including the emission rate, emission concentration and relevant emission factor of the Test Contaminants from the sources listed in Schedule B;
  - f. a tabular comparison of Source Testing results for the sources and Test Contaminants listed in Schedule B to original emission estimates described in the Company's application and the Original ESDM Report.
8. If the Source Testing results indicate the emission estimates are higher than the original emission estimates described in the Company's application and the Original ESDM Report, the Company shall update their ESDM Report in accordance with Section 26 of O. Reg. 419/05 with the emission estimates from the Source Testing report and make these records available for review by staff of the Ministry upon request. The updated Emission Summary Table from the updated ESDM Report shall be submitted within two (2) months after the Source Testing report is issued.

9. The Director may not accept the results of the Source Testing if:
  - a. the Source Testing Code or the requirements of the Manager were not followed; or
  - b. the Company did not notify the District Manager and the Manager of the Source Testing; or
  - c. the Company failed to provide a complete report on the Source Testing.
  
10. If the Director does not accept the results of the Source Testing, the Director may require re-testing. If re-testing is required, the Pre-Test Plan strategies need to be revised and submitted to the Manager for approval. The actions taken to minimize the possibility of the Source Testing results not being accepted by the Director must be noted in the revision.

## Schedule A

### Sources

Source ID	Source Description	Flowrate (cubic metres per second)	Temperature (degrees Celsius)	Diameter (metre)	Height above grade (metres)	Height above roof (metres)	Stack Orientation
S1	Plating Tank	1.13	35	0.30	10.60	4.50	Vertical
S2	Plastisol Coating and Drying	1.18	190	0.70	8.40	2.30	Vertical
S3	Clamp Preparation and Painting	0.47	25	0.70	8.40	2.30	Vertical
S4	Pin Lapping Area	0.47	25	0.70	8.40	2.30	Vertical
S5	Welding	0.61	25	0.80	7.52	0.51	Horizontal
S6	Electrical Discharge Machine	0.61	25	0.22	7.60	1.50	Horizontal

## Schedule B

### Source Testing Requirement

Source ID	Source Description	Test Contaminants
S1	Plating Tank	Hexavalent chromium, nickel, cobalt

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

1. Condition No. 1 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.
2. Condition No. 2 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.
3. Condition No. 3 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.
4. Condition No. 4 is included to provide the minimum performance requirements considered necessary to prevent an adverse effect resulting from the operation of the Facility.
5. Condition No. 5 is included to require the Company to gather accurate information so that the environmental impact and subsequent compliance with the EPA, the regulations and this Approval can be verified.

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

and

The Minister of the Environment,  
Conservation and Parks  
777 Bay Street, 5th Floor  
Toronto, Ontario  
M7A 2J3

and

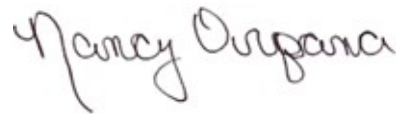
The Director appointed for the purposes of  
Part II.1 of the *Environmental Protection Act*  
Ministry of the Environment,  
Conservation and Parks  
135 St. Clair Avenue West, 1st Floor  
Toronto, Ontario

\* **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](http://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 25th day of April, 2022



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

EC/

c: Area Manager, MECP Windsor  
c: District Manager, MECP Sarnia  
Douglas Gay, Dillon Consulting Limited