

ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 0001111506

Version: 2.0

Issue Date: April 22, 2022

You have applied under section 20.2 of Part II.1 of the Environmental Protection Act, Revised Statutes of Ontario (R.S.O.) 1990, c. E. 19 (Environmental Protection Act) for approval of:

RECLAIM SOLUTIONS INC.

121 FRANK LAMBIER COURT
PALMERSTON ONTARIO
N0G 2P0

For the following site:

121 Frank Lambier Court , Palmerston, WELLINGTON NORTH, ONTARIO, CANADA, N0G 2P0

Upon issuance of the environmental compliance approval, I hereby revoke Approval No(s) 0001111506 version 1.0, issued on June 26, 2019.

This Environmental Compliance Approval revokes and replaces Certificate(s) of

A reclaimed metal manufacturing facility with the following sources:

- one (1) natural gas fired burn-off oven (Source S-1), with a primary burner having a nominal heat input rating of 1,055,000 kilojoules per hour and operating at temperatures ranging from 399 to 455 degrees Celsius and with an afterburner having a nominal heat input rating of 1,055,000 kilojoules per hour and operating at a nominal temperature of 788 degrees Celsius, discharging into the air through a stack, having an exit diameter of 0.41 metre, extending 7.79 metres above the roof and 17.34 metres above grade;
- one (1) dust collector baghouse (Source S-2) serving the furnace, ball mill and wire chopper, discharging into the air at a volumetric flow rate of 1.89 cubic metres per second through a stack, having an exit diameter of 0.51 metre, extending 5.49 metres above grade; and
- one (1) aluminum sweat furnace (Source S-9), with a heat input rating of 8,440,447 kilojoules per hour, discharging into the air through a stack, having an exit diameter of 0.41 metre, extending 5.55 metres above the roof and 13.72 metres above grade;

all in accordance with the Application for Approval submitted by the Company, dated September 10, 2020 and signed by Mark Reynolds, Director; and the supporting information, including the Emission Summary and Dispersion Modelling Report, submitted by GHD Limited, dated September 9, 2020 and signed by Erik Martinez and all additional information in support of the application provided by GHD Limited, including a revised Emission Summary and Dispersion Modelling Report dated September 17, 2021 and the Acoustic Assessment Report submitted by GHD Limited, dated September 9, 2020 and signed by Matthew Brenner.

DEFINITIONS

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

1. "Acoustic Assessment Report" means the report, prepared in accordance with Publication NPC-233 submitted in support of the application, that documents all sources of noise emissions and Noise Control Measures present at the Facility. "Acoustic Assessment Report" also means the Acoustic Assessment Report prepared by GHD Limited, dated September 9, 2020 and signed by Matthew Brenner;
2. "Approval" means this Environmental Compliance Approval, including the application and supporting documentation listed above;
3. "Best Management Practices Plan" means a document or a set of documents which describe measures to minimize dust emissions from the Facility and/or Equipment;
4. "Company" means Reclaim Solutions Inc., that is responsible for the construction or operation of the Facility and includes any successors and assigns;
5. "Director" means any Ministry employee appointed by the Minister pursuant to Section 5 of the EPA;
6. "District Manager" means the District Manager of the appropriate local district office of the Ministry, where the Facility is geographically located;
7. "EPA" means the Environmental Protection Act, R.S.O. 1990, c.E.19, as amended;
8. "Equipment" means the equipment and processes described in the Company's application, this Approval and in the supporting documentation submitted with the application, to the extent approved by this Approval;
9. "Facility" means the entire operation located on the property where the Equipment is located;
10. "Manual" means a document or a set of documents that provide written instructions to staff of the Company;
11. "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;
12. "Noise Control Measures" means measures to reduce the noise emissions from the Facility and/or Equipment including, but not limited to, silencers, acoustic louvres, enclosures, absorptive treatment, plenums and barriers. It also means the Noise Control Measures outlined in the Acoustic Assessment Report;
13. "Publication NPC-233" means the Ministry Publication NPC-233, "Information to be Submitted for Approval of Stationary Sources of Sound", October, 1995, as amended;
14. "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.

TERMS AND CONDITIONS

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

1. 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;
- c. operate the burn-off oven in such manner that:
 - i. the burner flame in the secondary chamber is established before the primary chamber is fired;
 - ii. the temperature in the secondary chamber is maintained at a minimum of 788 degrees Celsius at all times when the primary chamber is loaded and heat cleaning is in progress;
 - iii. the burner in the primary chamber is automatically turned off, if the secondary burner fails; and
 - iv. no substances containing chlorinated and/or fluorinated compounds, including polyvinyl chloride and Teflon are loaded into the burn-off oven.

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:
 - a. at all times ensure that the noise emissions from the Facility comply with the limits set out in Ministry Publication NPC-300; and
 - b. ensure that a maximum of one (1) bay door is opened from 7:00 pm to 7:00 am.

5. FUGITIVE DUST CONTROL

1. The Company shall implement the Best Management Practices Plan for the control of fugitive dust emissions resulting from the operation of the Facility. The Company shall update the Best Management Practices Plan as necessary or at the direction of the District Manager.

REASONS

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 requirement considered necessary to prevent an adverse effect resulting from the operation of the Facility.
5. Condition No. 5 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.

APPEAL PROVISIONS

In accordance with Section 139 of the *Environmental Protection Act*, you may by written notice served upon me and the Ontario Land Tribunal, within 15 days after the service of this notice, require a hearing by the Tribunal. You must also provide notice to, the Minister of the Environment, Conservation and Parks in accordance with Section 47 of the *Environmental Bill of Rights, 1993* who will place notice of your appeal on the Environmental Registry. Section 142 of the *Environmental Protection Act* provides that the notice requiring the hearing ("the Notice") shall state:

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

The Notice should also include:

- I. The name of the appellant;
- II. The address of the appellant;
- III. The environmental compliance approval number;
- IV. The date of the environmental compliance approval;
- V. The name of the Director, and;
- VI. The municipality or municipalities within which the project is to be engaged in.

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

This Notice must be served upon:

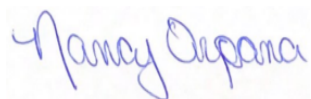
Registrar* Ontario Land Tribunal 655 Bay Street, Suite 1500 Toronto, Ontario M5G 1E5 OLT.Registrar@ontario.ca	and	The Minister of the Environment, Conservation and Parks 777 Bay Street, 5th Floor Toronto, Ontario M7A 2J3	and	The Director appointed for the purposes of Part II.1 of the <i>Environmental Protection Act</i> Ministry of the Environment, Conservation and Parks 135 St. Clair Avenue West, 1st Floor Toronto, Ontario M4V 1P5
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*** Further information on the Ontario Land Tribunal's requirements for an appeal can be obtained directly from the Tribunal at: Tel: (416) 212-6349 or 1 (866) 448-2248, or www.olt.gov.on.ca**

This instrument is subject to Section 38 of the *Environmental Bill of Rights, 1993*, that allows residents of Ontario to seek leave to appeal the decision on this instrument. Residents of Ontario may seek leave to appeal within 15 days from the date this decision is placed on the Environmental Registry. By accessing the Environmental Registry at ero.ontario.ca, you can determine when the leave to appeal period ends.

The above noted activity is approved under s.20.3 of Part II.1 of the *Environmental Protection Act*.

Dated at Toronto this 22nd day of April, 2022



Nancy Orpana

Director

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

c: Matthew Brenner, Dillon Consulting

Mark Reynolds

Erik Martinez, GHD Limited