

AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 6583-CFKN2E
Issue Date: July 18, 2022

Canadian Treads (Ontario) Inc. and Tirecraft Ontario Inc.
311 Ingersoll Street South
Ingersoll, Ontario
N5C 3R5

Site Location: 311 Ingersoll Street South
Ingersoll Town, County of Oxford
N5C 3R5

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;
- one (1) heat cleaning oven equipped with one (1) thermocouple in the primary chamber, one (1) thermocouple in the secondary chamber, one (1) natural gas-fired burner in the primary chamber having a maximum heat input of 791,250 kilojoules per hour, and one (1) natural gas-fired burner in the secondary chamber having a maximum heat input of 896,750 kilojoules per hour, exhausting passively to the air at a temperature of 815 degrees Celsius, through a stack, having an exit diameter of 0.25 metre, extending 0.91 metre above the roof and 11.21 metres above grade;

all in accordance with the Application for Approval (Air & Noise) submitted by Canadian Treads (Ontario) Inc. and Tirecraft Ontario Inc., dated February 6, 2021 and signed by Bruce Barnim, President, the supporting information, including the Emission Summary and Dispersion Modelling Report, submitted by OSB Consulting dated February 4, 2021 and signed by Stuart Bailey; email updates provided by Stuart Bailey on March 29, May 5, June 16, 21, 24, 27, and 30, 2022; and the Secondary Noise Screening Method prepared by OSB Consulting, dated January 29, 2021 and signed by Glenn Tang and the additional information sent by Glenn Tang of OSB Consulting on July 30, 2021 and August 6, 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 Canadian Treads (Ontario) Inc. and Tirecraft Ontario 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. "District Manager" means the District Manager of the appropriate local district office of the Ministry, where the Facility is geographically located;
4. "EPA" means the *Environmental Protection Act*, R.S.O. 1990, c.E.19;
5. "Equipment" means the heat cleaning oven as well as the thermocouples, described in the Company's application, this Approval and in the supporting documentation submitted with the application, to the extent approved by this Approval;
6. "Facility" means the entire operation located on the property where the Equipment is located;
7. "Manual" means a document or a set of documents that provide written instructions to staff of the Company;
8. "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;
9. "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.

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 buffing station under the following conditions:
- a. Ensure the water spray is being used;
 - b. Change the knives after a maximum of 85 tires are buffed; and
 - c. Keep a logbook documenting when the knives are changed.

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.
2. The Company shall restrict the operation of the Facility to the daytime hours from 7 a.m. to 7 p.m.

5. HEAT CLEANING OVEN

1. Operation and Maintenance

- a. The Company shall operate the Equipment in such a 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, as measured by the thermocouple, is maintained at a minimum of 815 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 Equipment.
- b. The Company shall ensure that the Equipment is properly operated and maintained at all times. The Company shall 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;
- iii. procedures for any record keeping activities relating to operation and maintenance of the Equipment; and
- iv. implement the recommendations of the operating and maintenance Manual.

2. Monitoring

- a. The Company shall continuously monitor and record the temperature in the secondary chamber of the Equipment, when the Equipment is in operation. The continuous temperature monitoring and recording system shall comply with the requirements outlined in the attached Schedule B.

3. Record Retention

- a. The Company shall retain, for a minimum of two (2) years from the date of their creation, all records on the maintenance and repair of the Equipment, as well as 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:
 - i. all records on the maintenance, repair and inspection of the Equipment;
 - ii. daily records of the actual operating temperature in the secondary chamber of the Equipment; and
 - iii. daily records of materials loaded into the Equipment.

Schedule A

Sources

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ID	Description	Flowrate (cubic metres per second)	Temperature (degrees Celsius)	Diameter (metre)	Height above grade (metres)	Height above roof (metres)
B1	Boiler	Passive	250	0.30	11.52	1.22
B2	Boiler	Passive	250	0.30	11.52	1.22
BO-1	Heat Cleaning Oven (Batch Burn Off)	Passive	815	0.25	11.21	0.91
S-1a	Particulate Collection System	1.30	ambient	0.25	5.18	-
S-1b	Particulate Collection System	1.30	ambient	0.25	5.18	-
S-2a	Particulate Collection System	1.30	ambient	0.25	5.18	-
S-2b	Particulate Collection System	1.30	ambient	0.25	5.18	-
EF-1	Curing Chamber Hood	1.42	38-43	0.89 (outer) 0.51 (inner)	11.04	0.74
EF-2	Curing Chamber Hood	1.42	38-43	0.89 (outer) 0.51 (inner)	11.04	0.74
EF-3	Curing Chamber Hood	1.42	38-43	0.89 (outer) 0.51 (inner)	11.04	0.74
EF-4	Curing Press	2.12	38-45	0.89 (outer) 0.51 (inner)	11.04	0.74
EF-5	Curing Press	2.12	38-45	0.89 (outer) 0.51 (inner)	11.04	0.74

Schedule A

Sources

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ID	Description	Flowrate (cubic metres per second)	Temperature (degrees Celsius)	Diameter (metre)	Height above grade (metres)	Height above roof (metres)
EF-6	Curing Press	2.12	38-45	0.89 (outer) 0.51 (inner)	11.04	0.74
EF-7	Curing Press	2.12	38-45	0.89 (outer) 0.51 (inner)	11.04	0.74
EF-8	General Area Exhaust	9.44	ambient	1.57 (outer) 0.95 (inner)	11.66	1.36
EF-9	General Area Wall Exhaust	2.83	ambient	0.91 X 0.91	8.69	-
EF-10	General Area Wall Exhaust	2.83	ambient	0.91 X 0.91	8.69	-
CO-1	Powder Coating Curing Tunnel	0.90	30-40	0.25	4.57	-

Schedule B

PARAMETER: Temperature

LOCATION: The sample point for the continuous temperature monitoring system shall be at a location where the measurements are representative of the minimum temperature of the gases leaving the secondary chamber of the Equipment.

PERFORMANCE: The continuous temperature monitoring system shall meet the following minimum performance specifications for the following parameters.

PARAMETERS	SPECIFICATION
1. Type:	shielded "K" type thermocouple, or equivalent.
2. Accuracy:	± 1.5 percent of the minimum gas temperature

The data recorder must be capable of registering continuously the measurement of the monitor without a significant loss of accuracy and with a time resolution of 1 minute or better.

RELIABILITY: The monitor shall be operated and maintained so that accurate data is obtained during a minimum of 95 percent of the time for each calendar quarter.

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. 4.1 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. 4.2 is included to ensure that operation of the Facility is not extended beyond the stated hours to prevent an adverse effect resulting from the operation of the Equipment.
6. Condition No. 5 is included to require the Company to gather accurate information on a continuous basis so that compliance with the EPA, regulations, and this Approval can be verified.

Upon issuance of the environmental compliance approval, I hereby revoke Approval No(s). 8430-ASMM92 issued on November 8, 2017.

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.

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:

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

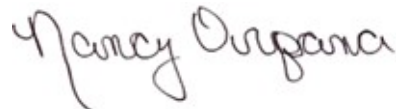
The Director appointed for the purposes of
Part II.1 of the *Environmental Protection Act*
Ministry of the Environment,
Conservation and Parks
135 St. Clair Avenue West, 1st Floor
Toronto, Ontario
M4V 1P5

*** 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 18th day of July, 2022



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

EC/

c: District Manager, MECP London - District
Stuart Bailey, OSB Consulting