

ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 1050-CBXUZ8

Issue Date: July 1, 2022

Stericycle ULC
95 Deerhurst Dr
Brampton, Ontario
L6T 5R7

Site Location: 15825 Robins Hill Road, Unit 2
City of London, County of Middlesex
N5V 0A5

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 operation of a Waste Disposal Site (Transfer)

to be used for the transfer of the following types of waste:

- hazardous waste, limited to Ontario waste classes: 148, 261, 262, 264, and 312P as defined in the Ministry's "New Ontario Waste Classes" dated January 1986 as amended;

generated by industrial, institutional and commercial sources.

Note: This Waste Disposal Site can only accept waste as a contingency in the event that the Stericycle facility in Brampton (Environmental Compliance Approval No. A680324) is unable to receive waste due to labour disruptions, unforeseen circumstances or any other abnormal situations that would prevent access to the already permitted site, as per conditions 13.2 and 13.3. Waste is not permitted to be accepted if Environmental Compliance Approval No. A680324 is revoked.

Note: Use of the site for any other type of waste is not approved under this environmental compliance approval, and requires obtaining a separate approval amending this environmental compliance approval.

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

- (1) "ECA" or "Approval" means this entire Environmental Compliance Approval document, issued in accordance with the EPA, and includes any schedules to it, the application and the supporting documentation listed in Schedule "A";

- (2) "EPA" means the Environmental Protection Act, R.S.O. 1990, C.E-19, as amended;
- (3) "Design and Operations Report" means the Design and Operations Report attached within the most recent email identified in Item (3) of Schedule "A" of this ECA;
- (4) "Director" means any Ministry employee appointed in writing by the Minister pursuant to section 5 of the EPA as a Director for the purposes of Part V of the EPA;
- (5) "District Manager" means the District Manager of the London District Office;
- (6) "Ministry" means the Ontario Ministry of the Environment and Climate Change;
- (7) "OWRA" means the Ontario Water Resources Act, R.S.O. 1990, c. O.40, as amended;
- (8) "Operator" means any person, other than the Owner's employees, authorized by the Owner as having the charge, management or control of any aspect of the site;
- (9) "Owner" means any person that is responsible for the establishment or operation of the Site being approved by this ECA, and includes Stericycle ULC, its successors and assigns;
- (10) "PA" means the Pesticides Act, R.S.O. 1990, c. P-11, as amended from time to time;
- (11) "Provincial Officer" means any person designated in writing by the Minister as a provincial officer pursuant to section 5 of the OWRA or section 5 of the EPA or section 17 of PA;
- (12) "Reg. 347" or "Regulation 347" means Regulation 347, R.R.O. 1990, General - Waste Management, made under the EPA, as amended from time to time;
- (13) "Site" means the 0.46 ha waste disposal site, including the parking lot with the waste storage trailers, located at Unit 2, 15825 Robins Hill Road, City of London; and
- (14) "Trained personnel" means competent personnel that have been trained through instruction and/or practice in accordance with Condition 22 of this ECA.

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

TERMS AND CONDITIONS

1.0 Compliance

- 1.1 The Owner and Operator shall ensure compliance with all the conditions of this ECA and shall ensure that any person authorized to carry out work on or operate any aspect of the Site is notified of this ECA and the conditions herein and shall take all reasonable measures to ensure any such person complies with the same.
- 1.2 Any person authorized to carry out work on or operate any aspect of the Site shall comply with the conditions of this ECA.
- 1.3 The Site shall be operated and maintained at all times including management and disposal of all waste in accordance with the EPA, Reg. 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.

2.0 Design, Develop, Build, Operate, Modify and Maintain in Accordance

- 2.1 Except as otherwise provided for in this ECA, the Site shall be designed, developed, built, operated, modified and maintained in accordance with the application for this ECA, dated October 6, 2020, the Design and Operations Report, and the other relevant supporting documentation listed in Schedule "A".

3.0 Interpretation

- 3.1 Where there is a conflict between a provision of any document, including the application, referred to in this ECA, and the conditions of this ECA, the conditions in this ECA shall take precedence.
- 3.2 Where there is a conflict between the application and a provision in any documents listed in Schedule "A", the application shall take precedence, unless it is clear that the purpose of the document was to amend the application and that the Ministry approved the amendment.
- 3.3 Where there is a conflict between any two documents listed in Schedule "A", other than the application, the document bearing the most recent date shall take precedence.
- 3.4 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 or unenforceable, the application of such requirement to other circumstances and the remainder of this ECA shall not be affected thereby.

4.0 Other Legal Obligations

4.1 The issuance of, and compliance with, this ECA does not:

- (1) relieve any person of any obligation to comply with any provision of any applicable statute, regulation or other legal requirement including, but not limited to:
 - (a) obtaining site plan approval from the local municipal authority;
 - (b) obtaining all necessary building permits from the local municipal authority Building Services Division;
 - (c) obtaining approval from the Chief Fire Prevention Officer, local municipal authority: or
- (2) limit in any way the authority of the Ministry to require certain steps be taken or to require the Owner and Operator to furnish any further information related to compliance with this ECA.

5.0 Adverse Effect

- 5.1 The Owner shall take steps to minimize and ameliorate any adverse effect on the natural environment or impairment of water quality resulting from the Site, including such accelerated or additional monitoring as may be necessary to determine the nature and extent of the effect or impairment.
- 5.2 Despite an Owner, Operator or any other person fulfilling any obligations imposed by this ECA, the Owner, Operator or any other person remains responsible for any contravention of any other condition of this ECA or any applicable statute, regulation, or other legal requirement resulting from any act or omission that caused the adverse effect to the natural environment or impairment of water quality.

6.0 Change of Owner

6.1 The Owner shall notify the Director in writing, and forward a copy of the notification to the District Manager, within thirty (30) days of the occurrence of any changes:

- (1) the ownership of the Site;
- (2) the Operator of the Site;
- (3) the address of the Owner or Operator;
- (4) the partners, where the Owner is or at any time becomes a partnership and a copy of the most recent declaration filed under the Business Names Act, R.S.O. 1990, c. B-17 shall be included in the notification; and

- (5) the name of the corporation where the Owner is or at any time becomes a corporation, other than a municipal corporation, and a copy of the most current information filed under the Corporations Information Act, R.S.O. 1990, c. C-39 shall be included in the notification.

6.2 No portion of this Site shall be transferred or encumbered prior to or after closing of the Site unless the Director is notified in advance and sufficient financial assurance is deposited with the Ministry to ensure that these conditions will be carried out. In the event of any change in ownership of the Site, other than change to a successor municipality, the Owner shall notify the successor of and provide the successor with a copy of this ECA, and the Owner shall provide a copy of the notification to the District Manager and the Director.

7.0 Financial Assurance

- 7.1 (1) Within twenty (20) days of issuance of this ECA, the Owner shall submit to the Director, Financial Assurance as defined in Section 131 of the EPA, in the amount of \$75,000.00. This Financial Assurance shall be in a form acceptable to the Director and shall provide sufficient funds for the analysis, transportation, Site clean-up, monitoring and disposal of all quantities of waste permitted to be on Site at any one time;
- (2) Commencing on March 31, 2025, and every three (3) years thereafter, the Owner shall provide to the Director a re-evaluation of the amount of the Financial Assurance to facilitate the actions required under Condition 7.1(1). Additional Financial Assurance, if required, must be submitted to the Director within twenty (20) days of written acceptance of the re-evaluation by the Director;
- (3) The amount of Financial Assurance is subject to review at any time by the Director and may be amended at his/her discretion; and
- (4) 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 at least sixty (60) days before the Financial Assurance terminates, the Owner shall forthwith replace the Financial Assurance with cash.

8.0 Inspections

- 8.1 No person shall hinder or obstruct a Provincial Officer from carrying out any and all inspections authorized by the OWRA, the EPA, or the PA, of any place to which this ECA relates, and without limiting the foregoing:
 - (1) to enter upon the premises where the approved works are located, or the location where the records required by the conditions of this ECA are kept;
 - (2) to have access to, inspect, and copy any records required to be kept by the conditions of

this ECA;

- (3) to inspect the Site, related equipment and appurtenances;
- (4) to inspect the practices, procedures, or operations required by the conditions of this ECA; and
- (5) to sample and monitor for the purposes of assessing compliance with the terms and conditions of this ECA or the EPA, the OWRA or the PA.

9.0 Information and Record Retention

- 9.1 Any information requested, by the Ministry, concerning the Site and its operation under this ECA, including but not limited to any records required to be kept by this ECA shall be provided to the Ministry, upon request, in a timely manner.
- 9.2 The receipt of any information by the Ministry or the failure of the Ministry to prosecute any person or to require any person to take any action, under this ECA or under any statute, regulation or other legal requirement, in relation to the information, shall not be construed as:
 - (1) an approval, waiver, or justification by the Ministry of any act or omission of any person that contravenes any term or condition of this ECA or any statute, regulation or other legal requirement; or
 - (2) acceptance by the Ministry of the information's completeness or accuracy.
- 9.3 All records required by the conditions of this ECA must be retained on Site for a minimum period of five (5) years from the date of their creation.
- 9.4 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.

10.0 Service Area and Hours of Operations.

- 10.1 Only waste that is generated within the geographical boundaries of Canada shall be accepted at the Site.
- 10.2 The Site may operate twenty-four (24) hours per day, seven (7) days a week unless otherwise restricted by municipal by-laws.

11.0 Signage and Security

11.1 The Owner shall install a sign at the main entrance/exit to the Site on which is legibly displayed the following information:

- (1) the name of the Site and Owner;
- (2) the number of this ECA;
- (3) the telephone number for the Ministry's Spill Action Centre;
- (4) the operating hours of the Site;
- (5) a twenty-four (24) hour telephone number that can be used to reach the Owner in the event of a complaint or an emergency; and
- (6) the type of waste that is approved for receipt at the Site and the contingency conditions for when this waste can be accepted.

11.2 The Owner shall operate and maintain the Site in a secure manner, with access to the trailers regulated and secured as detailed in the Design and Operations Report. Unless the loading or unloading of waste is occurring, the trailers shall be locked and the Site shall be secured against access by unauthorized persons.

12.0 Approved Waste Types and Waste Screening

12.1 The Owner may only accept the following types of waste at the Site: hazardous waste, limited to Ontario waste classes: 148, 261, 262, 264, and 312P as defined in the Ministry's "New Ontario Waste Classes" dated January 1986 as amended, generated by industrial, institutional and commercial sources.

12.2 No putrescible waste shall be accepted or stored at the Site.

12.3 All incoming waste shall be visually inspected by Trained personnel prior to being received at the Site to ensure that:

- (a) only waste approved under this ECA are received at this Site
- (b) the containers are undamaged and correctly and appropriately labelled; and
- (c) the waste is properly packaged.

12.4 Any incoming waste that arrives in leaking, damaged, improperly labelled, packaged or incorrectly identified containers shall be repackaged to contain the leak and/or re-labelled correctly, and in the case of Biomedical Waste, repackaged in accordance with the requirements

of Guideline C-4.

- 12.5 If any incoming waste load is known to, or is discovered to, contain unapproved waste, that load shall not be accepted at the Site.
- 12.6 If any unapproved waste is discovered on-site, that waste shall be immediately disposed of in accordance with the EPA and Reg. 347.
- 12.7 Within 48 hours of receipt of any incidental unacceptable waste, the Company shall notify the appropriate District Manager of such an occurrence and the mitigative action taken to properly handle and dispose of the waste.
- 12.8 Any incoming waste which has been incorrectly classified or characterized may be re-classified correctly in accordance with Reg. 347.
- 12.9 All wastes shall be transported to and from the Site by haulers approved by the Ministry or registered on the EASR, as required.

13.0 Approved Waste Quantities

- 13.1 The amount of waste that may be received at the Site shall not exceed 40 tonnes of hazardous waste per day.
- 13.2 This Site shall only accept waste as a contingency in the event that the Stericycle facility in Brampton (Environmental Compliance Approval No. A680324) is unable to receive waste due to labour disruptions, unforeseen circumstances or any other abnormal situations that would prevent access to the already permitted site. Waste is not permitted to be accepted if Environmental Compliance Approval No. A680324 is revoked.
- 13.3 The Owner shall notify the District Manager prior to accepting any waste, including the reason for accepting the waste in accordance with condition 13.2, and shall notify the District Manager once all of the waste at the Site has been removed. This notification shall occur each time the Site is required to begin accepting waste in accordance with condition 13.2.
- 13.4 The amount of waste that may be transferred from the Site for final disposal shall not exceed 40 tonnes per day.
- 13.5 The maximum amount of waste that may be stored at the Site at any one time shall not exceed 40 tonnes.
- 13.6 In the event that waste cannot be transferred from the Site, the Owner shall cease accepting any additional waste.
- 13.7 For the purposes of measuring compliance with this ECA, 1 cubic metre of liquid waste shall be equivalent to 1 tonne of waste.

14.0 Waste Storage

14.1 Waste must be stored in accordance with the current Design and Operations Report and at a minimum the Owner shall ensure that:

- (1) all anatomical waste and non-anatomical biomedical waste shall be immediately stored within the secure refrigerated trailers and shall not be stored at the Site for a total period exceeding fourteen (14) days from the date of receipt;
- (2) all other hazardous waste shall be stored within the secure trailers and shall not be stored at the Site for a period in excess of thirty (30) days from the date of receipt;
- (3) All incoming daily route trucks shall be emptied within the same day of arrival;
- (4) by the end of each operating day, all waste shall be stored within no more than four (4) secured trailers equipped with secondary spill containment, all approved under Environmental Compliance Approval No. A840598;
- (5) all biomedical waste shall be labelled, handled, managed and stored in accordance with the *Ministry* 's Guideline C-4 document entitled "The Management of Biomedical Waste in Ontario" dated November 2009 as amended from time to time.
- (6) all liquid waste shall be handled and stored in accordance with the Ministry's "*Guidelines for Environmental Protection Measures at Chemical and Waste Storage Facilities*" dated May 2007 as amended from time to time;
- (7) all incoming waste containers shall be stored without opening them or transferring them into other containers
- (8) notwithstanding condition 14.1(7), the Owner shall immediately repackage any incoming waste that is stored in a container that is found to be compromised; and
- (9) Any non-hazardous waste discovered on-site shall be adequately segregated and contained as to ensure that they do not come into contact with hazardous wastes while being stored and/or transferred at the Site.

14.2 Waste accepted under this ECA shall be transferred from the incoming trucks to the storage trailers via the indoor loading docks.

14.3 Waste shall not be stored indoors within the building.

15.0 Processing

15.1 No processing of waste shall take place at the Site.

16.0 Operation

- 16.1 The Owner shall ensure that the Site is operated in a safe and secure manner, such that the wastes are properly handled, contained and stored so as not to pose any threat to the general public, personnel and the environment.
- 16.2 Notwithstanding Condition 14.1 (6), the Owner shall clearly label all waste storage containers at the Site showing: waste class(es), waste characteristic (such as WHMIS and/or TDGA classification when applicable), and shall ensure that all labels are clearly visible for inspection and record keeping.
- 16.3 All biomedical waste shipped from the Site must be shipped to the Brampton Stericycle Facility (Environmental Compliance Approval no. A680324), any other Ministry-approved waste site, or a site approved to accept such waste by an appropriate government agency of equivalent jurisdiction where adequate screening for low-level radiation can be performed, all in accordance with the EPA and Regulation 347.
- 16.4 The Site shall be retrofit with a low-level radiation detector should there be repeated detections of low-level radioactivity from waste at receiving facilities. Should the need for the detector arise, an application shall be submitted to the Director for review and approval that amends the Site's Design and Operations Report to include additional screening and inspection measures.

17.0 Design and Operations Report

- 17.1 The Design and Operations Report shall be retained at the Site; kept up to date; and be available for inspection by Ministry staff.
- 17.2 Changes to the Design and Operations Report shall be submitted to the Director for approval.
- 17.3 The Owner shall maintain a document control record at the Site that tracks all changes that are made to the Design and Operations Report.

18.0 Nuisance Control

- 18.1 The Owner shall operate and maintain the Site such that the dust, odours, vectors, vermin, birds, litter, noise and traffic do not create a nuisance.
- 18.2 The Owner shall ensure that all vehicles transporting waste to and from the Site are not leaking or dripping waste or wastewater when arriving at or leaving the Site.
- 18.3 Should the Owner become aware that a vehicle delivering Organic Waste to the Site have leaked wastewater on the municipal roadways, the Owner shall immediately report the violation to the owner of the vehicle(s) and to the District Manager.

18.4 The Owner shall ensure that there is no queuing or parking of vehicles that are waiting to enter the Site on any roadway that is not a distinct part of the Site.

19.0 Site Inspections

19.1 Trained Personnel shall carry out a visual inspection of the Site each day the Site is in operation to ensure that:

- (1) the Site is secure, including all refrigerated trailers stored outside the building;
- (2) that the operation of the Site is not causing any nuisances including those from dust, odours, vectors, vermin, birds, litter, noise and traffic;
- (3) that the operation of the Site is not causing any adverse effects on the environment; and
- (4) that the Site is being operated in compliance with this ECA.

19.2 Any deficiencies discovered as a result of an inspection carried out under Condition 19.1 shall be remedied immediately, including temporarily ceasing operations at the Site if needed.

19.3 A record of the inspections shall be kept in the daily log book that includes the following information:

- (1) the name and signature of person that conducted the inspection;
- (2) the date and time of the inspection;
- (3) a list of any deficiencies discovered;
- (4) any recommendations for action; and
- (5) the date, time and description of actions taken to remedy deficiency.

20.0 Complaints

20.1 If at any time, the Owner receives complaints regarding the operation of the Site, the Owner shall respond to these complaints according to the following procedure:

- (1) The Owner shall record and number each complaint, either electronically or in a log book, and shall include the following information:
 - (a) the nature of the complaint;
 - (b) the name, address and the telephone number of the complainant if the complainant will provide this information; and
 - (c) the time and date of the complaint;

- (2) The Owner, upon notification of the complaint, shall initiate appropriate steps to determine all possible causes of the complaint, proceed to take the necessary actions to eliminate the cause of the complaint and forward a formal reply to the complainant; and
- (3) the Owner shall immediately notify the Ministry of the complaint, followed with the submission of a written report within one (1) week of the complaint detailing what actions were taken to identify and remediate the cause of the complaint, what remedial action would be taken, and any managerial or operational changes to reasonably avoid the reoccurrence of similar incidents.

21.0 Spill Prevention, Control & Countermeasures Plan

- 21.1 All spills, as defined in the EPA, shall be immediately reported to the Ministry's Spill Action Centre at 1-800-268-6060 and to the local municipal authority.
- 21.2 The Owner shall implement and maintain a Spill Prevention, Control & Countermeasures Plan for the Site. The Spill Prevention, Control & Countermeasures Plan shall include, but not necessarily be limited to:
 - (1) emergency response procedures to be undertaken in the event of a spill or process upset, including specific clean up methods for each different type of waste the Site is approved to accept;
 - (2) a list of equipment and spill clean up materials available in case of an emergency;
 - (3) contingency procedures to be followed in the event of equipment malfunction, a labour disruption, transportation disruption, inability of receiving sites to accept waste or other business disruption to the operation; and
 - (4) notification protocol with names and telephone numbers of persons to be contacted, including persons responsible for the Site, the Ministry's District Office and Spills Action Centre, the local municipal fire department, the local municipal authority, the local Medical Officer of Health, the Ministry of Labour, and the names and telephone numbers of waste management companies available for emergency response.
- 21.3
 - (1) The Owner shall review the Spill Prevention, Control & Countermeasures Plan and shall update the plan if necessary whenever modifications are made to the Site; and
 - (2) The Owner shall review the Spill Prevention, Control & Countermeasures Plan on an annual basis as a minimum, and shall ensure that the names and telephone numbers of the persons to be contacted as required under Condition 21.2(4) are up-to-date, and that these numbers are prominently displayed and immediately available to all staff and emergency response personnel.

- 21.4 The District Manager shall be notified within thirty (30) days of any changes to the Spill Prevention, Control & Countermeasures Plan.
- 21.5 The equipment, materials and personnel requirements outlined in the Spill Prevention, Control & Countermeasures Plan are required to be kept on Site and shall be immediately available on the Site at all times. The equipment shall be kept in a good state of repair and in a fully operational condition.
- 21.6 The Owner shall promptly take all necessary steps to contain and clean up any spills or upsets which result from this operation. All spills and upsets shall be recorded in a written log or an electronic file format, as to the nature of the spill or upset, and action taken for clean-up, correction and prevention of future occurrences.
- 21.7 Should a Spill, as defined in the EPA, occur at the Site, in addition to fulfilling the requirements from the EPA, the Owner shall submit to the District Manager a written report within three (3) business days of the emergency situation, outlining the nature of the incident, remedial measures taken, handling of waste generated as a result of the emergency situation and the measures taken to prevent future occurrences at the Site.

22.0 Training

- 22.1 All Site personnel shall be trained with respect to the following:
- (1) relevant waste management legislation, regulations and guidelines, including the EPA, Reg. 347 and Guideline C-4;
 - (2) any environmental concerns pertaining to the waste to be handled;
 - (3) occupational health and safety concerns pertaining to the wastes to be handled;
 - (4) operation and management of the Site;
 - (5) the Spill Prevention, Control & Countermeasures Plan and the procedures to be employed in the event of an emergency;
 - (6) specific written procedures for refusal of unacceptable waste loads;
 - (7) contingency procedures;
 - (8) specific written procedures for the control of nuisance conditions;
 - (9) emergency first-aid information and personal protective equipment; and
 - (10) the terms, conditions and operating requirements of this ECA.

22.3 The Owner shall maintain a written record of training at the Site which includes:

- (1) date of training;
- (2) the name and signature of the person who has been trained; and
- (3) description of the training provided.

22.4 The Owner shall ensure that Trained personnel is/are on duty at all times when the Site is open to carry out any activity required under this ECA.

22.5 The Owner shall ensure that all employees at the Site are trained in the requirements of this Approval relevant to the employee's position:

1. upon commencing employment at the Site in a particular position; and
2. whenever items listed in conditions 17.0 and 22.1 are changed or during the planned three (3)-year refresher training.

23.0 Record Keeping

23.1 During each day that waste is managed at the Site, the Owner shall maintain a daily record either electronically or in a log book which shall include the following information:

- (1) the type, date and time of arrival, source, and quantity (by weight) of all waste received at the Site;
- (2) the date, type, quantity (by weight) and destination of all waste transferred from the Site;
- (3) a record of any waste refusals which shall include: amounts, reasons for refusal and actions taken;
- (4) a running total of the amount of waste received at the Site for the calendar year and a calculation of the average daily amount of waste that has been received at the Site for the calendar year;
- (5) a running total of the amount of waste that has been transferred from the Site for the calendar year;
- (6) a calculation of the total quantity (by weight) of waste remaining on Site at the end of each operating day;
- (7) a record of the daily inspections required by Condition 19.0; and
- (8) a record of any spills or process upsets at the site, the nature of the spill or process upset

and the action taken for the clean up or correction of the spill, the time and date of the spill or process upset, and for spills, the time that the Ministry and other persons were notified of the spill in fulfilment of the reporting requirements in the EPA.

24.0 Annual Report

24.1 On March 31, 2023, and on an annual basis thereafter, the Owner shall retain on Site a written report which covers the previous calendar year. The report shall include, at a minimum, the following information:

- (1) a detailed monthly summary of the information required by Condition 23.1 (1) and 23.1 (2) including an annualized reconciliation between all wastes received at and transferred from the Site;
- (2) a summary of waste loads refused including the generator of the load, the licensed hauler of the load if the generator can not be determined, the date of refusal and reason for refusal of the load;
- (3) any environmental and operational problems, that are likely to negatively impact the environment, encountered during the operation of the Site and during the facility inspections and any mitigative actions taken;
- (4) a summary of complaints received and the actions taken to mitigate the issue associated with the complaint;
- (5) any recommendations to minimize environmental impacts from the operation of the Site and to improve Site operations and monitoring programs in this regard; and

25.0 Closure Plan

- 25.1
- (1) Four (4) months prior to the permanent closure of the Site, the Owner shall submit to the District Manager and Director, a written Closure Plan for approval. 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
 - (2) 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.

SCHEDULE "A"

This Schedule "A" forms part of this ECA:

1. Application for a Provisional Certificate of Approval for a Waste Disposal Site dated June 16, 2020, and signed by Dan Kokol, Operational EHS Specialist, Stericycle ULC including all attached supporting information.
2. Letter dated February 18, 2021 from Dan Kokol, Stericycle ULC, to Alan Tan, Ministry, regarding the storage of hazardous and liquid industrial wastes.
3. Emails dated March 18, 2022, April 14, 2022, May 20, 2022 and May 25th from Dan Kokol, Stericycle ULC, to Nick Zambito, Ministry, regarding Financial Assurance and the Site operations/design, including all supporting attachments.

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

The reason for Conditions 1, 3, 4, 5 and 9 is to clarify the legal rights and responsibilities of the Owner and Operator.

The reason for Conditions 2, 16 and 17 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.

The reasons for Condition 6.1 is to ensure that the Site is operated under the corporate name which appears on the application form submitted for this approval and to ensure that the Director is informed of any changes.

The reasons for Condition 6.2 are to restrict potential transfer or encumbrance of the Site without the approval of the Director and to ensure that any transfer of encumbrance can be made only on the basis that it will not endanger compliance with this ECA.

The reason for Condition 7 is to ensure that sufficient funds are available to the Ministry to clean up the Site in the event that the Company is unable or unwilling to do so.

The reason for Condition 8 is to ensure that appropriate Ministry staff have ready access to the Site for inspection of facilities, equipment, practices and operations required by the conditions in this ECA of Approval. This condition is supplementary to the powers of entry afforded a Provincial Officer pursuant to the EPA and OWRA.

The reason for Condition 10.1 is to specify the approved service area from which waste may be accepted at the Site.

The reason for Condition 10.2 is to specify the hours of operation for the Site.

The reason for Condition 11.1 is to ensure that users of the Site are fully aware of important information and restrictions related to Site operations and access under this ECA.

The reasons for Condition 11.2 is to ensure the controlled access and integrity of the Site by preventing unauthorized access when the Site is closed.

The reasons for Conditions 12, 13, and 14 are to specify the types of waste that may be accepted at the Site, the amounts of waste that may be stored at the Site, how the waste is to be stored and screened and the maximum rate at which the Site may receive and ship waste based on the Owner's application and supporting documentation.

The reason for Condition 18 is to ensure that the Site is operated in a manner which does not result in a nuisance or a hazard to the health and safety of the environment or people.

The reason for Condition 19 is to ensure that detailed records of Site inspections are recorded and maintained for inspection, security and information purposes.

The reason for Condition 20 is to ensure that any complaints regarding Site operations at the Site are responded to in a timely manner.

The reasons for Condition 21 is to ensure that an Emergency Response Plan is developed and maintained at the Site and that staff are properly trained in the operation of the equipment used at the Site and emergency response procedures.

The reason for Condition 22 is to ensure that the Site is operated by properly Trained staff in a manner which does not result in a hazard or nuisance to the natural environment or any person.

The reasons for Condition 23 is to provide for the proper assessment of effectiveness and efficiency of site design and operation, their effect or relationship to any nuisance or environmental impacts, and the occurrence of any public complaints or concerns. Record keeping is necessary to determine compliance with this ECA, the EPA and its regulations.

The reasons for Condition 24 are 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.

The reasons for Condition 25 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.

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 1st day of July, 2022



Mohsen Keyvani, P.Eng.

Director

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

NZ/

c: District Manager, MECP London - District
Dan Kokol EHS Specialist, Stericycle ULC