

AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 5504-CL6PR5

Issue Date: November 28, 2022

Supreme Galvanizing Ltd.
15 Blair Drive
Brampton, Ontario
L6T 2H4

Site Location: 15 Blair Drive
Brampton, Regional Municipality of Peel
L6T 2H4

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) sodium hydroxide storage tank identified as Source SHST, exhausting passively into the building;
- one (1) hydrochloric acid storage tank identified as Source HAST, exhausting passively to the air through a stack with an exit diameter of 0.05 metre, extending 0.81 metre above the roof and 9.08 metres above grade;
- two (2) sodium hydroxide dip tanks identified as Source SHDT, heated to 82 degrees Celsius and exhausting passively into the building;
- one (1) sodium hydroxide rinse tank heated to 82 degrees Celsius and exhausting passively into the building;
- three (3) hydrochloric acid dip tanks exhausting to the air through a three-stage acid scrubber, the first stage consisting of sine wave plates, the second stage a coalescer pad, and the third stage a demister, and then through a stack identified as Source HADT, at ambient temperature, a volumetric flowrate of 23.60 cubic metres per second, with exit dimensions of 1.47 metres by 1.47 metres, extending 6.58 metres above the roof and 14.85 metres above grade;
- one (1) galvanizing flux dip tank identified as Source GFDT, exhausting passively into the building;

- one (1) baghouse dust collector, to control emissions from the hot dip galvanizing operations, with a filtering area of 720 square metres, exhausting into the air through a stack identified as Source HDGB, a volumetric flowrate of 16.05 cubic metres per second, an exit diameter of 0.76 metre, extending 1.22 metres above the roof and 8.84 metres above grade;
- one (1) natural gas fired hot water boiler to heat the sodium hydroxide tanks, with a heat input of 8,614,532 kilojoules per hour, exhausting to the air through a stack identified as Source HWB, at a temperature of 150 degrees Celsius, a volumetric flowrate of 0.75 cubic metre per second, an exit diameter of 0.45 metre, extending 3.05 metres above the roof and 10.67 metres above grade;
- one (1) natural gas fired kettle burner used to melt zinc, with a heat input of 6,330,336 kilojoules per hour, exhausting to the air through a stack identified as Source KB, at a temperature of 50 degrees Celsius, a volumetric flowrate of 0.34 cubic metre per second, an exit diameter of 0.46 metre, extending 1.83 metres above the roof and 9.45 metres above grade; and
- one (1) zinc recovery burner, with a heat input of 844,045 kilojoules per hour, exhausting passively to the air at a temperature of 80 degrees Celsius, through a stack identified as Source ZRB, an exit diameter of 0.25 metre, extending 3.66 metres above grade;

all in accordance with the Application for Approval (Air) submitted by Supreme Galvanizing Ltd. dated April 8, 2021 and signed by Ernie De Angelis, President; the supporting information, including the Emission Summary and Dispersion Modelling Report, submitted by Hemmera Envirochem Inc., dated April 6, 2021 and signed by Lucas Neil and email updates provided by Lucas Neil on April 13, 26, August 11, 18, 2022 and Adam De Angelis on August 10, 12, 2022.

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. "Best Management Practices Plan" means the Best Management Practices Plan - Fugitive Dust, Rev. 1, prepared by Adam De Angelis, dated August 15, 2022, as amended;
3. "Company" means Supreme Galvanizing Ltd. 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. "EPA" means the Environmental Protection Act, R.S.O. 1990, c.E.19;
6. "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;

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. "Facility" means the entire operation located on the property where the Equipment is located;
9. "Manager" means the Manager, Technology Standards Section, Technical Assessment and Standards Development Branch, or any other person who represents and carries out the duties of the Manager, Technology Standards Section, Technical Assessment and Standards Development Branch, as those duties relate to the conditions of this Approval;
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. "Pre-Test Plan" means a plan for the Source Testing including the information required in Section 5 of the Source Testing Code;
13. "Procedure Document" means Ministry guidance document titled "Procedure for Preparing an Emission Summary and Dispersion Modelling Report" dated February 2017, 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;
15. "Source Testing" means site-specific sampling and testing to measure emissions resulting from operating the Targeted Sources under operating conditions that will derive an emission rate that, for the relevant averaging period of the contaminant, is at least as high as the maximum emission rate that the source of contaminant is reasonably capable of, or a rate approved by the Manager within the approved operating range of the Targeted Sources which satisfies paragraph 1 of subsection 11(1) of O. Reg. 419/05;
16. "Source Testing Code" means the Ontario Source Testing Code, dated June 2010, prepared by the Ministry, as amended;
17. "Targeted Sources" means the sources listed in Schedule "A";
18. "Test Contaminants" means the contaminants listed in Schedule "A".

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. 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. 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.

6. SOURCE TESTING

- 1. The Company shall perform Source Testing in accordance with the procedures in Schedule "B" to determine the rates of emissions of the Test Contaminants from the Targeted Sources listed in Schedule "A", within six (6) months of the date of this Approval.

SCHEDULE "A"

Targeted Sources and Test Contaminants for Source Testing

| Targeted Sources | Test Contaminants |
|--|-------------------|
| Hydrochloric Acid Dip tanks with three-stage scrubber (Source (HADT)) | Hydrogen Chloride |

SCHEDULE "B"

Source Testing Procedures

1. The Company shall submit, not later than three (3) months prior to the Source Testing, to the Manager a Pre-Test Plan for the Source Testing required under this Approval. The Company shall finalize the Pre-Test Plan in consultation with the Manager.
2. The Company shall not commence the Source Testing required under this Approval until the Manager has approved the Pre-Test Plan.
3. The Company shall notify the Manager, the District Manager and the Director 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.
4. The Company shall submit a report (electronic format) on the Source Testing to the Manager, the District Manager and the Director not later than three (3) months after completing the Source Testing. The report shall be in the format described in the Source Testing Code, and shall also include, but not be limited to:
 1. an executive summary;
 2. an identification of the applicable North American Industry Classification System code (NAICS) for the Facility;
 3. records of operating conditions at the time of Source Testing, including but not limited to the following:
 - a. production data and equipment operating rate as a percentage of maximum capacity;
 - b. Facility/process information related to the operation of the Targeted Sources;
 - c. description of the emission sources controlled by the Targeted Sources at the time of testing; and
 4. results of Source Testing, including the emission rate, emission concentration, and relevant emission factor of the Test Contaminants from the Targeted Sources;
 5. a tabular comparison of calculated emission rates and emission factors based on Source Testing results for the Test Contaminants to relevant estimates described in the ESDM Report, and,
5. The Director may not accept the results of the Source Testing if:
 1. the Source Testing Code or the requirement of the Manager were not followed;
 2. the Company did not notify the Manager, the District Manager and Director of the Source Testing; or
 3. the Company failed to provide a complete report on the Source Testing.

6. If the Director does not accept the result 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.
7. The Company shall update their ESDM Report in accordance with Section 26 of O. Reg. 419/05 and the Procedure Document with the results from the Source Testing if any of the calculated emission factors or calculated emission rates are higher than the predicted rates in the ESDM report, not later than three (3) months after the submission of the Source Testing report and make these records available for review by staff of the Ministry upon request.

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

1. Condition Nos. 1 and 5 are 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. 6 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.

**Upon issuance of the environmental compliance approval, I hereby revoke Approval No(s).
0132-A9ZPSU issued on May 18, 2016.**

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 28th day of November, 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 Halton-Peel
Lucas Neil, Hemmera Envirochem Inc.