

ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 1283-CLMLTX
Issue Date: March 5, 2023

Enbridge Gas Inc.
500 Consumers Road
Toronto, Ontario
M2J 1P8

Site Location: Disco Road Waste Management Facility
120 Disco Road
Toronto City,
M9W 1M4

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:

- a waste disposal site (transfer/processing) to be used for receipt of up-to a maximum of 1,130 normalized cubic metres per hour of biogas originating from anaerobic digestion of source separated organic waste and upgrading the biogas into Renewable Natural Gas for injection into natural gas distribution infrastructure, encompassing the following equipment and systems:
 - One (1) biogas upgrading facility (Biogas Upgrading System Facility) consisting of the following equipment and systems:
 - one (1) packed gas absorption tower that uses sulphuric acid for ammonia removal;
 - cooling heat exchanger, chiller and blower for moisture removal;
 - four (4) lead-lag activated carbon filtration vessels for volatile organic compound removal;
 - two (2) lead-lag activated carbon filtration vessels for hydrogen sulfide removal;
 - one (1) compressor to increase the biogas pressure required for optimal operation of the membrane system; and
 - three-stage membrane system for carbon dioxide removal and generation of Renewable Natural Gas;
 - Renewable Natural Gas compressor (booster) to increase the pressure prior to injection

into the natural gas distribution infrastructure;

- one (1) enclosed flare with a maximum biogas burning capacity of 1,835 cubic metres per hour, equipped with a pilot system, to burn biogas originating from the anaerobic digestion of Source Separated Organic Waste, discharging into the air at a maximum volumetric flow rate of 5.24 actual cubic metres per second at an approximate temperature of 875 degrees Celsius, through a stack, having an exit diameter of 1.981 metre, extending 7.62 metres above grade;
- one (1) Passive Gas Management System consisting of eight (8) perforated collection pipes, four (4) beneath the Biogas Upgrading System Facility and four (4) beneath the Renewable Natural Gas injection station to manage potential subsurface existing landfill gas migration and accumulation, exhausting to the air through four (4) turbine ventilators at both the Biogas Upgrading System and Injection Station..

all in accordance with the Application for Approval (Air) submitted by the Company, dated August 11, 2022 and signed by Wes Armstrong, including the Emission Summary and Dispersion Modelling Report, submitted by GHD, Dated August 12, 2022 and signed by Matthew Griffin; and email updates provided by Matthew Griffin of GHD on December 07, 2022; and an email update provided by Ryan Loveday of GHD on January 25, 2023; and the Acoustic Assessment Report prepared by GHD, dated August 12, 2022 and signed by Michael Masschaele.

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

1. "Adjacent Facility" means the City of Toronto's Disco Road Waste Management Facility that is located at 120 and Part of 150 Disco Road, Toronto, Ontario;
2. "Approval" means this Environmental Compliance Approval, including the application and supporting documentation listed above;
3. "Carbon Filter" means activated carbon filters that are being used for removal of Hydrogen Sulphide (H₂S) and volatile organic compounds from the biogas;
4. "Company" means **Enbridge Gas Inc.** that is responsible for the construction or operation of the Facility and includes any successors and assigns;
5. "Depleted" means the capacity of the Carbon Filter to adsorb emissions is reached and the Carbon Filter is no longer able to effectively reduce emissions of Hydrogen Sulphide (H₂S) or volatile organic compounds from the biogas;
6. "District Manager" means the District Manager, Toronto District Office, Central Region of the Ministry;
7. "EPA" means the Environmental Protection Act, R.S.O. 1990, c.E.19, as amended;
8. "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;

9. "ESDM Report" means the most current Emission Summary and Dispersion Modelling Report that describes the Facility and prepared in accordance with section 26 of O. Reg. 419/05 and the Procedure Document;
10. "Facility" means the entire Biogas Upgrading System (BMS) operation located on the property where the Equipment is located;
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 the Ontario Regulation 419/05, Air Pollution – Local Air Quality; as amended;
14. "Procedure Document" means Ministry guidance document titled "Guidance for Emission Summary and Dispersion Modelling Report under Ontario Regulation 419/05" dated March 2018, as amended;
15. "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; and
16. "Source Separated Organic Waste" means organic waste suitable for anaerobic digestion which has been separated at its source of origin by the generator of the waste and including the bags used by the generator to encase the organic waste at the source of generation.

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, prior to the first receipt of Biogas at the Facility, 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. not permit the Carbon Filter to be Depleted at any time during the operation of the Carbon Filter.

2. DOCUMENTATION REQUIREMENTS

1. While preparing, or proposing to update or updating the ESDM Report and the Acoustic Assessment Report, the Company shall consider the most current information from the Adjacent Facility.

3. 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.

4. NOTIFICATION OF COMPLAINTS

1. A designated representative of the Company shall be available to receive public complaints

caused by the operations at the Facility twenty-four (24) hours per day, seven (7) days per week.

2. If at any time, the Company receives a complaint regarding the operation of the Facility, the Company shall respond to the complaint according to the following procedure:
 - a. the Company shall record each complaint on a formal complaint form entered in a computerized tracking system. The information recorded shall include the nature of the complaint, circumstances of the complaint including the wind direction and other weather conditions, the name, address and the telephone number of the complainant, if available, and the time and date of the complaint;
 - b. the Company, upon notification of the complaint shall initiate appropriate steps to determine the validity of the complaint, 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
 - c. the Company shall immediately notify the District Manager in writing, of the received complaint, followed with the submission of a written report within one (1) week of the complaint detailing what actions, if any, were taken to validate the complaint, identify and remediate the cause of the complaint, the name(s) of Company personnel responsible for handling the incident and a description of the measures taken to prevent a similar occurrence in the future.

5. 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.

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 Nos. 2 and 3 are 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. 4 is included to require the Company to notify staff of the Ministry so as to assist the Ministry with the review of the Facility's compliance.
4. Condition No. 5 is included to provide the minimum performance requirements considered necessary to prevent an adverse effect resulting from the operation of the Facility.

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

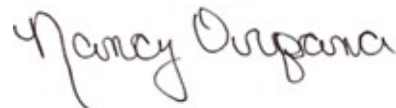
The Director appointed for the purposes of
Part II.1 of the *Environmental Protection Act*
Ministry of the Environment,
Conservation and Parks
135 St. Clair Avenue West, 1st Floor
Toronto, Ontario
M4V 1P5

*** 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 5th day of March, 2023



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

BS/

c: District Manager, MECP Toronto - District
Matthew Griffin & Michael Masschaele, GHD