

**Approval for Site-specific Standards Issued
Pursuant to s.35(1) of O. Reg. 419/05**

Approval Number: 1664-C43Q9G

Reference Number: 0525C-43P28

Issue Date: March 15, 2023

Expiry Date: March 14, 2033

Site-specific
Standard Issued Ontario Power Generation Inc.
to:

Site Location: Lennox Generating Station, Lots 15 to 22, Concession 1
Town of Greater Napanee, County of Lennox & Addington, Ontario

DEFINITIONS - TERMS

For the purpose of this site-specific standard approval for Sulphur Dioxide, the following definitions apply:

- (1) "Action Plan" means the document entitled "Action Plan", dated July 09, 2021 and an addendum dated February 16, 2022 submitted by the Company as part of its Request.
- (2) "Approval" means this site-specific standard approval (Approval Number 1664-C43Q9G), reference number 0525C-43P28 issued March 15, 2023.
- (3) "Company" means Ontario Power Generation (OPG) and includes any successors and assigns in accordance with section 19 of the EPA.
- (4) "Director" means a Director in the Environmental Assessment and Permissions Branch of the Ministry appointed pursuant to section 5 of the EPA for the purpose of section 35 of the Regulation.
- (5) "District Manager" means the District Manager, Kingston District Office, Eastern Region of the Ministry.
- (6) "EPA" means the Environmental Protection Act, R.S.O. 1990, c. E.19, as amended from time to time.
- (7) "Facility" means the Company facility referred to as Lennox Generating Station (Lennox GS) and located at 7263 Highway 33, Bath, Ontario.
- (8) "Ministry" means the Ontario Ministry of the Environment, Conservation and Parks.
- (9) "Ministry Review Report" means the report, dated Feb 16, 2022, that provides a written review by Ministry staff of the Request by the Company for a site-specific standard for Sulphur Dioxide for a 1-hour averaging period.
- (10) "POI" means point of impingement and has the same definition as section 2 of the Regulation.

- (11) "Regulation" means Ontario Regulation 419/05: Air Pollution – Local Air Quality made under the EPA.
- (12) "Request" means the request made under section 32 of the Regulation dated July 09, 2021, and an addendum dated February 16, 2022, and submitted by the Company with respect to the Sulphur Dioxide 1-hour averaging period standard listed in Schedule 3 of the Regulation and includes,
- i. the request document signed by John Hefford;
 - ii. an Emission Summary and Dispersion Modelling Report;
 - iii. a Technology Benchmarking Report;
 - iv. a Public Consultation Summary Report summarizing the reason for not holding a public meeting; and,
 - v. the Action Plan.
- (13) "Sulphur Dioxide" means the contaminant identified by the Chemical Abstract Number 7446-09-5.

GROUNDINGS FOR APPROVAL

In accordance with section 35 of the Regulation,

A. I, the Director, am satisfied that:

1. The Request is consistent with subsection 32(1), paragraphs 5 and 7 of the Regulation.
2. The requirements of section 32 of the Regulation have been met.
3. The Request satisfies the requirements of section 33 and other relevant portions of the Regulation.
4. The notification and holding of a public meeting and follow-up to the public meeting by the Company met the requirements under Section 34 of the Regulation.

B. Based on the above conclusions and the information that I have reviewed, including the Request, the Ministry Review Report, the Facility description in the Request and various interactions with the Company, I am of the opinion that:

1. The Company cannot comply with section 20 of the Regulation with respect to the Sulphur Dioxide standard of 690 micrograms per cubic metre over a 1-hour averaging period in Schedule 3 of the Regulation, nor with the standard 1-hour averaging period standard of 100 micrograms per cubic metre coming into force on July 1, 2023, because it is not economically feasible for the Company to comply.
2. The site-specific standard for Sulphur Dioxide, set out in Table 1 below, is the minimum difference necessary to enable the Company to comply with section 20 of the Regulation.

3. The conditions imposed and the end date for the Approval are appropriate having considered the following:
 - a. The nature of Sulphur Dioxide;
 - b. The frequency with which the inability to comply with section 20 referred to in sub clause 35 (1)(b)(i) of the Regulation would occur; and,
 - c. Whether there are any acute effects associated with Sulphur Dioxide.
4. There is no public interest reason sufficient to require denial of the Request.
5. The site-specific Sulphur Dioxide standard is not likely to permit discharges of the contaminant that too frequently result in the concentration of the contaminant at a point of impingement located on a place referred to in subsection 30(8) of the Regulation exceeding the other time period upper risk threshold set out for the contaminant in Schedule 6 of the Regulation.
6. Compliance with this Approval will result in improvements to reduce discharges to air.

C. The Company was provided a draft copy of the Approval on February 17, 2022 and was provided an opportunity to make written submissions to the Director during the period that ended 30 days after the draft was given.

SITE-SPECIFIC STANDARD APPROVED

Pursuant to s.35 (1), (4), (4.1) and (5) of the Regulation, with respect to discharges from the Facility, references in the Regulation to a standard set out in Schedule 3 for Sulphur Dioxide shall be deemed to be references to the site-specific standard set out in Table 1 for the averaging period set out in Table 1.

The standard with a 24-hour averaging period for Sulphur Dioxide set out in Schedule 3 of the Regulation remains applicable to the discharges from the Facility. On and after July 1, 2023, the standard with an annual averaging period for Sulphur Dioxide set out in Schedule 3 of the Regulation will remain applicable to the discharges from the Facility.

Table 1: Site-Specific Standard for the Facility

Contaminant	Contaminant Chemical Abstracts Service No.	Applicable Time Period	Site-specific Standard (µg/m³)	Site-specific Standard Averaging Period
Sulphur Dioxide	7446-09-5	From the Date of this Approval to March 14, 2028	2026	1-hour
Sulphur Dioxide	7446-09-5	From March 15, 2028 to March 14, 2033	1430	1-hour

CONDITIONS

You are hereby notified that this Approval is issued to you subject to the conditions outlined below pursuant to subsection 35 (6) of the Regulation. Please note that subsection 35 (7) of the Regulation states that the approved site-specific standard for

Sulphur Dioxide for the 1-hour averaging period applies only if the following conditions are complied with.

1. Condition 1: Reasonable Effort to Use Natural Gas

The Company shall make reasonable effort to procure natural gas to generate electricity subject to availability and cost.

2. Condition 2: Written Summary of Action Plan Implementation

- 2.1. The Company shall prepare a written summary of the measures taken each calendar year to implement the Action Plan, including a description of each measure taken, the date of implementation of each measure taken, and proposed dates for the implementation of measures yet to be taken.
- 2.2. The Company shall submit an electronic copy of the summary to the District Manager no later than March 31 of the year following the calendar year that is being summarized or by a later date as set out in writing by the District Manager.

REASONS FOR CONDITIONS

Condition 1: Reasonable Effort to Use Natural Gas

Condition No. 1 is included so that the Facility makes reasonable effort to procure natural gas to generate electricity subject to availability and cost.

Condition 2: Written Summary of Action Plan Implementation

Condition 2 is included to ensure the measures identified in the Action Plan are implemented according to the dates identified Appendix 1 of this Approval.

EXPIRY

In accordance with subsection 35 (9) of the Regulation, this Approval shall expire on March 14, 2033 after which the standard set out in Schedule 3 to the Regulation for the 1-hour averaging period will apply to discharges of Sulphur Dioxide from the Facility.

The above noted Request is approved under Section 35 of the Regulation.

This Approval is issued this 15th day of March 2023.

"Originally Signed By"

Dan McDonald
Director, Section 35, O. Reg. 419/05
Air Policy and Programs Branch

Appendix 1: Summary of Action Plan Items

Item	Actions	Proposed completion date
1	Purchase residual fuel oil with a sulphur content no greater than 0.5%	Immediately for the entire duration of the site-specific standard
2	An RFO inventory for electricity production with an annual average sulphur content of 0.6% or lower	Five years from the date of Approval of this site-specific standard