

ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 6981-CLUQN8

Issue Date: May 5, 2023

Vineland Manufacturing Ltd.
453 Eastchester Avenue East
St. Catharines, Ontario
L2M 6S2

Site Location: 453 Eastchester Avenue East
453 Eastchester Ave E
St. Catharines City, Regional Municipality of Niagara

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) paint spray booth (All Other Inside Paint Booth), for the application of solvent based coatings at a maximum rate as listed in Schedule "A", exhausting into the atmosphere at a volumetric flow rate of 8.62 cubic metres per second, through a stack having an exit diameter of 0.51 metres, extending 3.0 metres above the roof and 8.0 metres above grade;
- one (1) exhaust system serving the All Other Inside Paint Booth vacuum drying area, exhausting into the atmosphere at a volumetric flow rate of 0.37 cubic metres per second, through a stack having an exit diameter of 0.41 metres, extending 3.0 metres above the roof and 8.0 metres above grade;
- one (1) exhaust system serving the All Other Inside Paint Booth flash-off tunnel, exhausting into the atmosphere at a volumetric flow rate of 1.63 cubic metres per second, through a stack having an exit diameter of 0.61 metres, extending 3.0 metres above the roof and 8.0 metres above grade;
- one (1) paint spray booth (Outside Paint Booth), exhausting into the atmosphere at a volumetric flow rate of 4.7 cubic metres per second, through a stack having an exit diameter of 0.51 metres, extending 3.0 metres above the roof and 8.0 metres above grade;
- one (1) exhaust system serving the Outside Paint Booth flash-off tunnel, exhausting into the atmosphere at a volumetric flow rate of 1.32 cubic metres per second, through a stack having an exit diameter of 0.44 metres, extending 3.0 metres above the roof and 8.0 metres above grade;

- one (1) burner exhaust serving the Outside Paint Booth drying oven, having a maximum thermal input of 126,607 kilojoules per hour, exhausting into the atmosphere at a volumetric flow rate of 0.305 cubic metres per second, through a stack having an exit diameter of 0.254 metres, extending 3.0 metres above the roof and 8 metres above grade;
- one (1) exhaust system serving the Outside Paint Booth drying oven, exhausting into the atmosphere at a volumetric flow rate of 0.28 cubic metres per second, through a stack having an exit diameter of 0.51 metres, extending 3.0 metres above the roof and 8.0 metres above grade;
- one (1) exhaust system serving the Outside Paint Booth cooling tunnel, exhausting into the atmosphere at a volumetric flow rate of 4.2 cubic metres per second, through a stack having an exit diameter of 0.61 metres, extending 3.0 metres above the roof and 8.0 metres above grade;
- one (1) exhaust system to provide ventilation to a paint storage area/paint mixing room, exhausting into the atmosphere at a volumetric flow rate of 0.14 cubic metres per second, through a stack having exit diameter of 0.14 metres, extending 3.0 metres above the roof and 8.0 metres above grade;
- one (1) paint spray booth (16" Line Paint Booth), for the application of solvent based coatings at maximum rates as listed in Schedule "A", exhausting into the atmosphere at a volumetric flow rate of 3.77 cubic metres per second, through a stack having an exit diameter of 0.61 metres, extending 3.0 metres above the roof and 8.0 metres above grade;
- one (1) exhaust system serving the 16" Line Paint Booth flash-off tunnel, exhausting into the atmosphere at a volumetric flow rate of 2.35 cubic metres per second, through a stack having an exit diameter of 0.46 metres, extending 3.0 metres above the roof and 8.0 metres above grade; and
- two (2) dust collectors serving welding and plasma cutting operations, exhausting internally to the facility.

all in accordance with the Environmental Compliance Approval Application submitted by Vineland Manufacturing Ltd., dated June 2, 2021 and signed by Michele Whittington, Controller; the supporting information, including the Emission Summary and Dispersion Modelling Report, submitted by RWDI AIR Inc., dated June 5, 2021 and signed by Khalid Hussein, and includes any changes to the report made up to the date of issuance of this Approval, and the Acoustic Assessment Report prepared by RWDI AIR Inc., dated April 15, 2021 and signed by Gillian Redman.

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 Vineland Manufacturing Ltd. operating as Vineland Manufacturing 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;

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 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;
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; and
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. 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.

**Schedule A
Maximum Usage Rates**

Source	Type	Product Name	Mixing Ratio	Maximum Usage Rate (L/day)
All Other Inside Paint Booth	Primer	Red Oxide	n/a	32
	Clean-up	Toluene Solvent	n/a	16
Outside Paint Booth	Primer	Black Air Dry Alkyd Primer	n/a	32
	Primer	Kem-Flash 500 Primer Black SW Polane Reducer	9:1 (Primer: Reducer)	48
	Primer	2.8 VOC Catalyzed Epoxy Primer Grey 2.8 VOC Catalyzed Epoxy Primer Catalyst Solvent Methyl Ethyl Ketone	75:21:4 (Primer: Catalyst: Reducer)	32
	Topcoat	Quick Dry Enamel Aluminium Polane Reducer	9:1 (Paint: Reducer)	16
	Topcoat	Polane S Plus Poyurethane Enamel Part A (Black or Green or Blue or Red Oxide or Yellow Oxide) Polane Exterior Catalyst Reducer Methyl Ethyl Ketone	84:14:2 (Paint: Catalyst: Reducer)	16
	Clean-up	Toluene Solvent	n/a	16
	16" Line Paint Booth	Primer	Epoxyester Primer Red Oxide	n/a
Primer		Devran 224 Epoxy Coating Part A Devran 224 Catalyst Part B T10 Thinner	45:45:10 (Primer: Converter: Thinner)	31
Primer		Carboguard 890 Part A Carboguard 890 Part B Thinner #2	45:45:10 (Primer: Converter: Thinner)	16
Topcoat		Devthane Red Base Part A Devane Catalyst Part B T10 Thinner	70:20:10 (Paint: Converter: Thinner)	16
Topcoat		Carbothane 134HG Grey Part A Carbothane Converter 134HG Part B Thinner #214	72:18:10 (Paint: Converter: Thinner)	17
Clean-up		Toluene Solvent	n/a	16

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 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 May, 2023



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

SM/

c: District Manager, MECP Niagara
Khalid Hussein, RWDI AIR Inc.