

ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER A-500-1221203196

Version: 1.0

Issue Date: April 17, 2024

Pursuant to section 20.3 of the Environmental Protection Act, Revised Statutes of Ontario (R.S.O.) 1990, c. E. 19 and subject to all other applicable Acts or regulations this Environmental Compliance Approval is issued to:

Ridge (Chatham) Holdings LP

6220 HIGHWAY 7 600
VAUGHAN ONTARIO
L4H 4G3

For the following site:

20262 Erieau Road , Blenheim, CHATHAM-KENT, ONTARIO, CANADA, N0P 1A0

Upon issuance of the environmental compliance approval, I hereby revoke Approval No(s) 2395-BVDTGX, issued on December 16, 2020.

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:

- four (4) enclosed flares, each with a maximum landfill gas firing rate of 1.0 cubic metres per second, discharging through a stack with an exit diameter of 2.9 metres and a height of 11.6 metres above grade;
- one (1) enclosed flare, with a maximum landfill gas firing rate of 1.27 cubic metres per second, discharging through a stack with an exit diameter of 3.0 metres and a height of 12.2 metres above grade;
- one (1) enclosed flare serving the renewable natural gas plant, with a maximum landfill gas firing rate of 1.4 cubic metres per second, discharging through a stack with an exit diameter of 4.0 metres and a height of 18.3 metres above grade;
- one (1) thermal oxidizer serving the renewable natural gas plant, discharging to the air through a stack, having a maximum volumetric flow rate of 1.5 cubic metres per second, an exit diameter of 1.9 metre, and extending 15.2 metres above grade;
- concrete crushing operations;
- wood grinding operations;
- storage piles; and
- material handling operations;

all in accordance with the Environmental Compliance Approval Application submitted by Ridge (Chatham) Holdings G.P. Inc., as a general partner for and on behalf of Ridge (Chatham) Holdings, L.P., dated March 31, 2023 and signed by Alim Lalani; the supporting information, including the Emission Summary and Dispersion Modelling Report, prepared by Dillon Consulting Limited, dated February 28, 2023 and signed by Robert Morgan; the Acoustic Assessment Report prepared by Dillon Consulting Limited, dated March 28, 2023 and signed by Robert Morgan; an email dated November 3, 2023 from Robert Morgan of Dillon Consulting; and an email dated December 13, 2023 from Amir Iravani of Dillon Consulting.

DEFINITIONS

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

1. "Acoustic Assessment Report" means the report by Dillon Consulting Limited, dated March 2023 and signed by Elham Alavi and Amir Iravani, prepared in accordance with Publication NPC-233 and submitted in support of the application for this Approval, documenting all sources of noise emissions and Noise Control Measures present at the Facility;
2. "Air Quality Monitoring Manual" means the Ministry publication entitled "Operations Manual for Air Quality Monitoring in Ontario PIBS 6687e", dated March 2018, as amended;
3. "Air Quality Monitoring Plan" means the document titled, "Ambient Air Quality Monitoring Plan – Ridge Landfill Expansion", prepared in accordance with the Air Quality Monitoring Manual by Dillon Consulting and dated January 2021;
4. "Approval" means this Environmental Compliance Approval, including the application and supporting documentation listed above;
5. "Best Management Practices Plan" means the document titled "Best Management Practices Plan for Fugitive Dust and Odour Control", dated September 2022 and prepared by Dillon Consulting Limited, which describes measures to minimize dust emissions from the Facility and/or Equipment;
6. "Best Management Practices Plan for odour" means the document titled "Best Management Practices Plan for Fugitive Dust and Odour Control", dated September 2022 and prepared by Dillon Consulting Limited, which describes measures to minimize odour emissions from the Facility and/or Equipment;
7. "Continuous Temperature Monitoring System" means the continuous monitoring and recording system used to monitor and record the operating temperature of each Flare and thermal oxidizer described in this Approval;
8. "Company" means Ridge (Chatham) Holdings G.P. Inc. as a general partner for and on behalf of Ridge (Chatham) Holdings, L.P., that is responsible for the construction or operation of the Facility and includes any successors and assigns;
9. "District Manager" means the District Manager of the appropriate local district office of the Ministry, where the Facility is geographically located;
10. "EPA" means the Environmental Protection Act, R.S.O. 1990, c.E.19, as amended;
11. "Equipment" means the Flares, Thermal Oxidizer and ancillary 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;
12. "Facility" means the entire operation located on the property where the Equipment is located;
13. "Flares" means the six (6) enclosed flares described in the Company's application, this Approval and in the supporting documentation submitted with the application, to the extent approved by this Approval;
14. "Manual" means a document or a set of documents that provide written instructions to staff of the Company;
15. "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;
16. "Noise Control Measures" means measures to reduce the noise emissions from the Facility and/or Equipment including, but not limited to, silencers, acoustic louvers, enclosures, absorptive treatment, plenums and barriers; It also means the noise control measures outlined in the Acoustic Assessment Report;
17. "Noise Guidelines for Landfill Sites" means the Ministry draft technical publication "Noise Guidelines for Landfill Sites", published by the Ministry, October 1998, as amended;
18. "Publication NPC-233" means the Ministry Publication NPC-233, "Information to be Submitted for Approval of Stationary Sources of Sound", October, 1995, as amended;
19. "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;

20. "Residence Time" means the length of time the combustion gases from the Flare are retained in the enclosure, as measured from the flame tip to a continuous temperature monitoring device;
21. "Schedule" means the schedules attached to, and forming part of, this Approval, namely:
 - Schedule 1 - Continuous Temperature Monitor and Data Recorder;
 - Schedule 2 - Flare Combustion Chamber Temperature and Residence Time.

TERMS AND CONDITIONS

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

1. PERFORMANCE REQUIREMENTS

1. The Company shall install and maintain a Continuous Temperature Monitoring System to continuously monitor and record the operating temperature of each Flare and Thermal Oxidizer. The Continuous Temperature Monitoring System shall comply with the requirements outlined in Schedule 1.
2. The Company shall ensure that each Flare maintains the operating temperature as recorded by the Continuous Temperature Monitoring System, and Residence Time as specified in Schedule 2.
3. The Company shall not direct any emissions to the Thermal Oxidizer until the temperature of the combustion chamber has achieved a minimum temperature of 871 degrees Celsius.
4. The Company shall ensure that the combustion chamber of the Thermal Oxidizer maintains a minimum removal efficiency of equal to 98% for the Target Compounds.
5. The Company shall, at all times, ensure that the noise emissions from the Facility comply with the limits set out in Ministry Noise Guidelines for Landfill Sites and Publication NPC-300.
6. The Company shall, at all times, ensure that the Noise Control Measures are properly maintained and continue to provide the acoustical performance outlined in the Acoustic Assessment Report.

2. 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. procedures to monitor and record the quality, for example methane content, and quantity of landfill gas delivered to each Flare for combustion;
 - iii. dates and times when each Flare is operated and the operational details;
 - iv. procedures to calibrate the temperature monitoring and recording equipment specified in Schedule 1;

- v. procedures to measure and maintain the destruction efficiency of the Target Compounds by the Thermal Oxidizer;
 - vi. emergency procedures, including spill clean-up procedures and procedures to prevent upset conditions;
 - vii. procedures for any record keeping activities relating to the operation and maintenance of the Equipment;
 - viii. procedures to record the quantity of renewable natural gas produced at the Facility;
 - ix. all appropriate measures to minimize noise, dust and odorous emissions from all potential sources; and
 - x. procedures for recording and responding to environmental complaints relating to the operation of the Facility.
- b. implement the recommendations of the Manual.

3. FUGITIVE DUST CONTROL

1. The Company shall,
 - a. implement the Best Management Practices Plan for the control of fugitive dust emissions resulting from the operation of the Facility.
 - b. review and update the Best Management Practices Plan annually or at the direction of the District Manager;
 - c. record the result of each review, and update the Best Management Practices Plan accordingly within thirty (30) days of the completion of the review;
 - d. maintain the updated Best Management Practices Plan at the Facility and provide a copy to the District Manager within forty-five (45) days of the update; and
 - e. implement, at all times, the most recent version of the Best Management Practices Plan.
2. The Company shall record, either electronically or in a log book, each time a specific preventative and control measure described in the Best Management Practices Plan is implemented. The Company shall record, as a minimum:
 - a. the date when each emission control measure is installed, including a description of the control measure;
 - b. the date when each new preventative measure or operating procedure to minimize emissions is implemented, including a description of the preventative measure or operating procedure; and
 - c. the date, time of commencement, and time of completion of each periodic activity conducted to minimize emissions, including a description of the preventative measure/procedure and the name of the individual performing the periodic activity.

4. ODOUR CONTROL

1. The Company shall,

- a. implement the Best Management Practices Plan for Odour to control odour emissions resulting from the operation of the Facility;
 - b. review and update the Best Management Practices Plan for Odour annually or at the direction of the District Manager;
 - c. record the results of each review and update as required the Best Management Practices Plan for Odour within thirty (30) days of the completion of each review;
 - d. maintain the updated Best Management Practices Plan for Odour at the Facility and provide a copy to the District Manager within forty-five (45) days of an update; and
 - e. implement, at all times, the most recent version of the Best Management Practices Plan for Odour.
2. The Company shall record, either electronically or in a log book, each time a specific preventative and control measure described in the Best Management Practices Plan for Odour is implemented. The Company shall record, as a minimum:
- a. the date when each emission control measure is implemented, including a description of the control measure;
 - b. the date when each new preventative measure or operating procedure to minimize emissions is implemented, including a description of the preventative measure or operating procedure; and
 - c. the date, time of commencement, and time of completion of each periodic activity conducted to minimize emissions, including a description of the preventative measure/procedure and the name of the individual performing the periodic activity.

5. AIR QUALITY MONITORING PROGRAM

1. The Company shall,
 - a. implement the approved Ambient Air Quality Monitoring Program for the measurement of:
 - i. suspended particulate matter; and
 - ii. Volatile Organic Compounds
 - b. review and update the Ambient Air Quality Monitoring Program annually or at the direction of the District Manager
 - c. record the results of each review and update as required the Ambient Air Quality Monitoring Program within thirty (30) days of the completion of each review;
 - d. maintain the updated Ambient Air Quality Monitoring Program at the Facility and provide a copy to the District Manager within forty-five (45) days of an update; and
 - e. implement, at all times, the most recent version of the Ambient Air Quality Monitoring Program.
2. The Company shall submit the ambient air quality monitoring data and summary reports on the ambient air quality monitoring program as per the requirements of the Air Quality Monitoring Manual to the District Manager, or on an alternative frequency acceptable to the District Manager and make copies of the reports available to the public.

6. 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;
 - b. all records related to the Air Quality Monitoring Program;
 - c. all records produced by the Continuous Temperature Monitoring System; and
 - d. 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.

7. 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.
 - c. the wind direction and other weather conditions at the time of the incident; and
 - d. the name(s) of Company personnel responsible for handling the incident.

8. CHANGE OF OWNERSHIP

1. The Company shall notify the Director in writing, and forward a copy of the notification to the District Manger, within thirty (30) days of the occurrence of any of the following changes to the facility operations:
 - a. the ownership of the Facility;
 - b. the operator of the Facility;
 - c. the address of the Company;
 - d. the partners, where the Company is or 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;
 - e. the name of the corporation where the Company 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.
2. In the event of any change in ownership of the Facility, the Company shall notify the successor of the existence of this Approval and provide the successor with a copy of this Approval, and the Company shall provide a copy of the notification to the District Manager and the Director.

REASONS

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

1. Condition No. 1 is included to provide the minimum performance requirements considered necessary to prevent an adverse effect resulting from the operation of the Facility.

2. Condition Nos. 2 to 4 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.
3. Condition No. 5 is included to prevent an adverse effect resulting from the operation of the Facility.
4. Condition No. 6 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.
5. Condition No. 7 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.
6. Condition No. 8 is included to require the Company to notify/report to the Ministry so that compliance with the EPA, the regulations and this Approval can be verified.

APPEAL PROVISIONS

In accordance with Section 139 of the *Environmental Protection Act*, you may by written notice served upon me and the Ontario Land Tribunal, within 15 days after the service of this notice, require a hearing by the Tribunal. You must also provide notice to, the Minister of the Environment, Conservation and Parks in accordance with Section 47 of the *Environmental Bill of Rights, 1993* who 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:

- I. 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;
- II. 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:

- I. The name of the appellant;
- II. The address of the appellant;
- III. The environmental compliance approval number;
- IV. The date of the environmental compliance approval;
- V. The name of the Director, and;
- VI. 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 <i>Environmental Protection Act</i> Ministry of the Environment, Conservation and Parks 135 St. Clair Avenue West, 1st Floor Toronto, Ontario M4V 1P5
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*** 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 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 17th day of April, 2024



Nancy Orpana

Director

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

c: Alim Lalani, BFI Canada

Robert Morgan, Dillon Consulting Limited

The following schedules are a part of this environmental compliance approval:

SCHEDULE 1

CONTINUOUS TEMPERATURE MONITOR AND DATA RECORDER

LOCATION:

The continuous temperature monitors shall be located in the combustion chamber where the measurements are representative of the actual operating temperature of the Equipment.

PERFORMANCE:

The continuous temperature monitor shall meet the following minimum performance specifications for the following parameters:

	PARAMETERS	SPECIFICATION
1.	Type:	shielded "K" or "N" type thermocouple, or equivalent
2.	Accuracy:	plus or minus 1.5 degrees Celsius

DATA RECORDER:

The data recorder must be capable of registering continuously the measurement of the monitor without a significant loss of accuracy and with a time resolution of 1 minute or better.

RELIABILITY:

The monitor shall be operated and maintained so that accurate data is obtained during a minimum of 95 percent of the time in which the Equipment is in operation. This target shall be met on a monthly basis.

SCHEDULE 2

COMBUSTION CHAMBER TEMPERATURE AND RESIDENCE TIME

Flare	Combustion Chamber Temperature (degrees Celsius)	Residence Time
S1	760	0.6
S2	760	0.6
S3a	760	0.6
S3b	760	0.6
S3c	875	0.75
S16	871	0.7