

AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 5005-CSYL97
Issue Date: May 30, 2024

Heidelberg Materials Canada Limited
1370 Hwy 49
Post Office Box, No. 620
Picton, Ontario
K0K 2T0

Site Location: 1370 Highway 49
1370 Highway 49 Picton
Prince Edward County,
K0K 2T0

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:

Description Section

A cement clinker and cement manufacturing facility, using dry process kiln, fired by Conventional Fuels, natural gas and co-fired with ALCF, consisting of the following processes and support units:

- limestone quarry operations, including limestone extraction and transfers;
- raw materials receiving, handling and processing including limestone transfers, primary and secondary crushing and milling controlled by baghouse type dust collectors;
- Conventional Fuels receiving and processing operations controlled by baghouse type dust collectors;
- Alternative Low Carbon Fuels (ALCF) receiving, handling and processing;
- dry process cement clinker kiln, including;
 - preheater type kiln (Kiln 4), equipped with a dust control system (an electrostatic precipitators (ESPs) or baghouse type) and Kiln 4 bypass stack, equipped with a baghouse type dust control system;
 - Process Controls/Interlocks System to control co-firing of ALCF;
 - Selective Non-Catalytic Reduction (SNCR) ammonia solution injection system to control nitrogen oxides emissions;
 - dry sorbent injection system to control sulphur dioxide emissions;

- clinker coolers, clinker transfers and storage controlled by baghouse type dust collectors;
- cement production, including cement mills, cement storage and shipping controlled by baghouse type dust collectors;
- slag processing and handling; and
- cement kiln dust (CKD) handling operations;

including the Equipment and any other ancillary and support processes and activities, operating at a Facility Production Limit of up to;

- **163 tonnes per hour of cement clinker produced by Kiln 4; and**
- **up to 200 tonnes per day (or up to 8.33 tonnes per hour) of Alternative Low-Carbon Fuels (ALCF) co-fired with Conventional Fuels and/or natural gas**

discharging to the air as described in the Original ESDM Report.

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

1. "ACB List" means the document entitled "Air Contaminants Benchmarks (ACB) List: Standards, guidelines and screening levels for assessing point of impingement concentrations of air contaminants" (v.3.0-April 2021), as amended from time to time and published by the Ministry and available on a Government website;
2. "Acceptable Point of Impingement Concentration" means a concentration accepted by the Ministry as not likely to cause an adverse effect for a Compound of Concern that,
 - a. is not identified in the ACB list, or
 - b. is identified in the ACB list as belonging to the category "Benchmark 2" and has a concentration at a Point of Impingement that exceeds the concentration set out for the contaminant in that document.

With respect to the Original ESDM Report, the Acceptable Point of Impingement Concentration for a Compound of Concern mentioned above is the concentration set out in the Original ESDM Report;

3. "Acoustical Consultant" means a person currently active in the field of environmental acoustics and noise/vibration control, who is familiar with Ministry noise guidelines and procedures and has a combination of formal university education, training and experience necessary to assess noise emissions from a Facility;
4. "Acoustic Assessment Report" means the report, prepared in accordance with Publication NPC-233 and Appendix A of the Basic Comprehensive User Guide, by Golder Associates Ltd. and dated November 24, 2022 submitted in support of the application, that documents all sources of noise emissions and Noise Control Measures present at the Facility, as updated in accordance with Condition 5 of this Approval;
5. "Acoustic Assessment Summary Table" means a table prepared in accordance with the Basic Comprehensive User Guide summarising the results of the Acoustic Assessment

Report, as updated in accordance with Condition 5 of this Approval;

6. "Acoustic Audit" means an investigative procedure consisting of measurements and/or acoustic modelling of all sources of noise emissions due to the operation of the Facility, assessed to determine compliance with the performance limits for the Facility regarding noise emissions, completed in accordance with the procedures set in Publication NPC-103 and reported in accordance with Publication NPC-233;
7. "Acoustic Audit Report" means a report presenting the results of an Acoustic Audit, prepared in accordance with Publication NPC-233;
8. "Alternative Low-Carbon Fuels (ALCF)" means fuels as defined in O. Reg. 79/15 and include the following materials;
 1. Construction & Demolition (C&D) Materials; including but not limited to primary wood material with minor amounts of non-recyclable paper and plastic;
 2. Industrial, Commercial, and Institutional (IC&I) Materials; including but not limited to primary non-recyclable paper, plastic and textiles wood material, and tire fluff;
 3. Combustible fraction of non-recyclable household waste (commonly referred to as (Refuse Derived Fuel)); and
 4. Discarded treated seed.
9. "ALCF Manual" means the document entitled "Alternative Low Carbon Fuel Handling Procedures and Testing Manual" Heidelberg Materials Ltd. - Picton Cement Plant, Version 2.0, dated March 2024, reviewed and approved by Carsten Schraeder, Plant Manager, as amended;
10. "ALCF Process Controls and Interlocks" means the document entitled "Environmental SOP, ALCF Process Controls and Interlocks", Version 1.1 dated March 7, 2024 and approved by Carsten Schraeder, Plant Manager, as amended;
11. "ALCF Source Testing Proposal" means the document entitled "Alternative Low Carbon Fuels (ALCF) Source Testing Proposal, Version 1.0" dated May 21, 2024 and approved/signed by Carsten Schraeder - Plant Manager, as amended;
12. "Approval" means this entire Environmental Compliance Approval and any Schedules to it;
13. "Base Line Emissions" means emissions rates of Tested Contaminants when Conventional Fuels are firing only to produce clinker;
14. "Basic Comprehensive User Guide" means the Ministry document titled "Basic Comprehensive Certificates of Approval (Air) User Guide" dated March 2011, as amended;
15. "BMPP means the document entitled "Fugitive Dust -Best Management Practices Plan (BMPP), Heidelberg Materials Ltd. - Picton Cement Plan ", version 1.4 dated March 2024, approved and signed by Carsten Schraeder, Plan Manager, as amended;
16. "Carbon Dioxide Emission Intensity" has the same meaning as defined under O. Reg. 79/15;
17. "CEM System" means the continuous emissions monitoring and recording system used to measure and record the emissions from emission stack;
18. "CPM System" means the continuous monitoring and recording system used to measure

and record parameters of the exhaust gas stream or operational parameters of the process, including but not limited to temperature, oxygen (O₂) concentration and carbon oxide (CO) concentrations;

19. "Company" means Heidelberg Materials Canada Limited operating as Heidelberg Materials Canada Limited 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;
20. "Compound of Concern" means a contaminant described in paragraph 4 subsection 26 (1) of O. Reg. 419/05, namely, a contaminant that is discharged from the Facility in an amount that is not negligible;
21. "Continuous Monitoring Plan" means the documents entitled "Heidelberg Materials, Continuous Monitoring - QA/QC Plan - Picton Operations Kiln 4 Main Stack", Final Copy Rev.7 (TSS File No.:ER-SA-110223:24 dated 2024/03/21) and "Heidelberg Materials, Continuous Monitoring - QA/QC Plan - Picton Operations Kiln 4 Bypass Stack", Final Copy Rev.7 (TSS File No.:ER-SA:110252:24 dated 2024/03/22), as amended.
22. "Conventional Fuels" means low sulphur coal and pet coke used for regular firing;
23. "Description Section" means the section on page one of this Approval describing the Company's operations and the Equipment located at the Facility and specifying the Facility Production Limit for the Facility;
24. "Director" means a person appointed for the purpose of section 20.3 of the EPA by the Minister pursuant to section 5 of the EPA;
25. "District Manager" means the District Manager of the appropriate local district office of the Ministry, where the Facility is geographically located;
26. "Dust Collectors Emission Control" means the document entitled "Environmental SOP, Large Dust Collector Emission Control" Heidelberg Materials, Picton Plant" dated March 21, 2024, Version 1.2, approved and signed by Carsten Schraeder - Plan Manager, as amended;
27. "Emission Summary Table" means a table described in paragraph 14 of subsection 26 (1) of O. Reg. 419/05;
28. "Environmental Assessment Act" means the Environmental Assessment Act, R.S.O. 1990, c.E.18;
29. "EPA" means the Environmental Protection Act, R.S.O. 1990, c.E.19;
30. "Equipment" means equipment or processes described in the ESDM Report, this Approval and in the Schedules referred to herein and any other equipment or processes;
31. "Equipment with Specific Operational Limits" means cement clinker kiln (Kiln 4) or any Equipment related to the thermal oxidation of waste or waste derived fuels, fume incinerators or any other Equipment that is specifically referenced in any published Ministry document that outlines specific operational guidance that must be considered by the Director in issuing an Approval;
32. "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;

33. "Facility" means the entire operation located on the property where the Equipment is located;
34. "Facility Production Limit" means the production limit placed by the Director on the main product(s) or raw materials used by the Facility;
35. "Fugitive dust" means any solid particulate matter that becomes airborne, other than that emitted from an exhaust stack, directly or indirectly as a result of the activities of any person.
36. "Method 22" means US EPA Method 22 - Visual Determination of Fugitive Emissions from Material Sources and Smoke Emissions from Flares
37. "Highest Ranking Person" means the highest ranking person regularly present at the Facility who has management responsibilities relating to the Facility;
38. "Independent Acoustical Consultant" means an Acoustical Consultant who is not representing the Company and was not involved in preparing the Acoustic Assessment Report or the design/implementation of Noise Control Measures for the Facility and/or Equipment. The Independent Acoustical Consultant shall not be retained by the Acoustical Consultant involved in the noise impact assessment or the design/implementation of Noise Control Measures for the Facility and/or Equipment;
39. "Log" means a document that contains a record of each change that is required to be made to the ESDM Report and Acoustic Assessment Report, including the date on which the change occurred. For example, a record would have to be made of a more accurate emission rate for a source of contaminant, more accurate meteorological data, a more accurate value of a parameter that is related to a source of contaminant, a change to a Point of Impingement and all changes to information associated with a Modification to the Facility that satisfies Condition 2;
40. "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;
41. "Minister" means the Minister of the Environment, Conservation and Parks or such other member of the Executive Council as may be assigned the administration of the EPA under the Executive Council Act;
42. "Ministry" means the ministry of the Minister;
43. "Modification" means any construction, alteration, extension or replacement of any plant, structure, equipment, apparatus, mechanism or thing, or alteration of a process or rate of production at the Facility that may discharge or alter the rate or manner of discharge of a Compound of Concern to the air or discharge or alter noise or vibration emissions from the Facility;
44. "Noise Abatement Action Plan" means the noise abatement program developed by the

Company, submitted to the Director and District Manager and approved by the Director, designed to achieve compliance with the sound level limits set in Ministry Publication NPC-300. It also means the Noise Abatement Action Plan from the Acoustic Assessment Report dated November 24, 2022, prepared by Tomasz Nowak of Golder Associates Ltd.;

45. "Noise Control Measures" means measures to reduce the noise emissions from the Facility and/or Equipment including, but not limited to, silencers, acoustic louvres, enclosures, absorptive treatment, plenums and barriers, described in the Company's application, and in the supporting documentation referred to herein, including the Acoustic Assessment Report, to the extent approved by this Approval;
46. "O. Reg. 79/15" means Ontario Regulation 79/15: Alternative Low Carbon Fuels, as amended;
47. "O. Reg. 419/05" means Ontario Regulation 419/05: Air Pollution – Local Air Quality, made under the EPA, as amended;
48. "Original ESDM Report" means the Emission Summary and Dispersion Modelling Report which was prepared in accordance with section 26 of O. Reg. 419/05 and the Procedure Document by Jeff Zywicki (Golder Associates Ltd.) and dated November 24, 2022 submitted in support of the application, and includes any changes to the report made up to the date of issuance of this Approval;
49. "Point of Impingement" has the same meaning as in section 2 of O. Reg. 419/05;
50. "Point of Reception" means Point of Reception as defined by Publication NPC-300;
51. "Procedure Document" means Ministry guidance document titled "Procedure for Preparing an Emission Summary and Dispersion Modelling Report" dated March 2018, as amended;
52. "Processes with Significant Environmental Aspects" means the Equipment which, during regular operation, would discharge one or more contaminants into the air in an amount which is not considered as negligible in accordance with section 26 (1) 4 of O. Reg. 419/05 and the Procedure Document;
53. "Publication NPC-103" means the Ministry Publication NPC-103 of the Model Municipal Noise Control By-Law, Final Report, August 1978, published by the Ministry as amended;
54. "Publication NPC-207" means the Ministry draft technical publication "Impulse Vibration in Residential Buildings", November 1983, supplementing the Model Municipal Noise Control By-Law, Final Report, published by the Ministry, August 1978, as amended;
55. "Publication NPC-233" means the Ministry Publication NPC-233, "Information to be Submitted for Approval of Stationary Sources of Sound", October, 1995, as amended;
56. "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;
57. "Pre-Test Plan" means a plan for the Source Testing including the information required in Section 5 of the Source Testing Code;
58. "Schedules" means the following schedules attached to this Approval and forming part of

this Approval namely:

- Schedule A - Supporting Documentation
 - Schedule B - Performance Limits - In Stack Emission Limits
 - Schedule C - Source Testing Procedure
 - Schedule D - Test Contaminants
59. "SOx Compliance Protocol" means document entitled "Heidelberg Materials, Picton Plant, Production SOP, SOx Compliance Protocol for 2023 Regulatory Limit", Version 2.0, dated March 7, 2024, prepared by Dan Miller, Environmental Manager, approved and signed by Carsten Schraeder - Plan Manager, as amended;
 60. "Source Testing" means site-specific sampling and testing to measure emissions resulting from operating the Equipment 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 Equipment which satisfies paragraph 1 of subsection 11(1) of O. Reg. 419/05;
 61. "Source Testing Code" means the Ontario Source Testing Code, dated June 2010, prepared by the Ministry, as amended;
 62. "Test Contaminants" means the contaminants listed in Schedule D
 63. "Tested Sources" means Kiln 4 and Kiln 4 Bypass stacks
 64. "Toxicologist" means a qualified professional currently active in the field of risk assessment and toxicology that has a combination of formal university education, training and experience necessary to assess contaminants; and
 65. "Written Summary Form" means the electronic questionnaire form, available on the Ministry website, that documents whether Modifications were undertaken at the Facility and compliance with the Approval, in the previous calendar year.

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. GENERAL

1. Except as otherwise provided by this Approval, the Facility shall be designed, developed, built, operated and maintained in accordance with the terms and conditions of this Approval and in accordance with the following Schedules attached hereto:
 1. Schedule A - Supporting Documentation
 2. Schedule B - Performance Limits - In Stack Emission Limits
 3. Schedule C - Source Testing Procedure
 4. Schedule D - Test Contaminants
2. The use of ALCF is approved at the Facility under the requirements of O. Reg. 79/15,

and pursuant to Section 3 of O. Reg. 79/15, Section 27 of the EPA does not apply to the facility

2. LIMITED OPERATIONAL FLEXIBILITY

1. Pursuant to section 20.6 (1) of the EPA and subject to Conditions 2.2 and 2.3 of this Approval, future construction, alterations, extensions or replacements are approved in this Approval if the future construction, alterations, extensions or replacements are Modifications to the Facility that:
 1. are within the scope of the operations of the Facility as described in the Description Section of this Approval;
 2. do not result in an increase of the Facility Production Limit above the level specified in the Description Section of this Approval; and
 3. result in compliance with the performance limits as specified in Condition 4.
2. Condition 2.1 does not apply to,
 1. the addition of any new Equipment with Specific Operational Limits or to the Modification of any existing Equipment with Specific Operational Limits at the Facility;
 2. Modifications to the Facility that would be subject to the Environmental Assessment Act; and
 3. alternation of the ALCF and the increase in the quantity of ALCF specified in this Approval;
3. Condition 2.1 of this Approval shall expire ten (10) years from the date of this Approval, unless this Approval is revoked prior to the expiry date. The Company may apply for renewal of Condition 2.1 of this Approval by including an ESDM Report and an Acoustic Assessment Report that describes the Facility as of the date of the renewal application.

3. REQUIREMENT TO REQUEST AN ACCEPTABLE POINT OF IMPINGEMENT CONCENTRATION

1. Prior to making a Modification to the Facility that satisfies Condition 2.1.a. and 2.1.b., the Company shall prepare a proposed update to the ESDM Report to reflect the proposed Modification.
2. The Company shall request approval of an Acceptable Point of Impingement Concentration for a Compound of Concern if the Compound of Concern is not identified in the ACB List as belonging to the category "Benchmark 1" and a proposed update to an ESDM Report indicates that one of the following changes with respect to the concentration of the Compound of Concern may occur:
 1. The Compound of Concern was not a Compound of Concern in the previous version of the ESDM Report and
 1. the concentration of the Compound of Concern exceeds the concentration set out for the contaminant in the ACB List; or

2. the Compound of Concern is not identified in the ACB List; or
2. The concentration of the Compound of Concern in the updated ESDM Report exceeds the higher of,
 1. the most recent Acceptable Point of Impingement Concentration, and
 2. the concentration set out for the contaminant in the ACB List, if the contaminant is identified in that document.
3. The request required by Condition 3.2 shall propose a concentration for the Compound of Concern and shall contain an assessment, performed by a Toxicologist, of the likelihood of the proposed concentration causing an adverse effect at Points of Impingement.
4. If the request required by Condition 3.2 is a result of a proposed Modification described in Condition 3.1, the Company shall submit the request, in writing, to the Director at least 30 days prior to commencing to make the Modification. The Director shall provide written confirmation of receipt of this request to the Company.
5. If a request is required to be made under Condition 3.2 in respect of a proposed Modification described in Condition 3.1, the Company shall not make the Modification mentioned in Condition 3.1 unless the request is approved in writing by the Director.
6. If the Director notifies the Company in writing that the Director does not approve the request, the Company shall,
 1. revise and resubmit the request; or
 2. notify the Director that it will not be making the Modification.
7. The re-submission mentioned in Condition 3.6 shall be deemed a new submission under Condition 3.2.
8. If the Director approves the request, the Company shall update the ESDM Report to reflect the Modification.
9. Condition 3 does not apply if Condition 2.1 has expired.

4. PERFORMANCE LIMITS

1. Subject to Condition 4.2, the Company shall not discharge or cause or permit the discharge of a Compound of Concern into the air if,
 1. the Compound of Concern is identified in the ACB list as belonging to the category "Benchmark 1" and the discharge results in the concentration at a Point of Impingement exceeding the Benchmark 1 concentration; or
 2. the Compound of Concern is not identified in the ACB List as belonging to the category "Benchmark 1" and the discharge results in the concentration at a Point of Impingement exceeding the higher of,
 1. if an Acceptable Point of Impingement Concentration exists, the most recent Acceptable Point of Impingement Concentration, and

2. the concentration set out for the contaminant in the ACB List, if the contaminant is identified in that document.
2. Condition 4.1 does not apply if the benchmark set out in the ACB List has a 10-minute averaging period and no ambient monitor indicates an exceedance at a Point of Impingement where human activities regularly occur at a time when those activities regularly occur.
 3. The stated in the Description Section, Facility Production Limit of up to 163 tonnes per hour of cement clinker produced by Kiln 4, may be adjusted to the maximum 110% of the production rate recorded during the compliance source testing (the Actual Production Limit) for test contaminants listed in Schedule D, unless the compliance source testing will be performed at the minimum production rate of 148 tonnes per hour of cement clinker produced by Kiln 4;
 1. The maximum Actual Production Limit from any previous compliance source testing shall be maintained up to the next follow up compliance source testing.
 4. The company shall ensure, subsequent to the completion of the Noise Abatement Action Plan, that the noise emissions from the Facility comply with the limits set out in Ministry Publication NPC-300.
 5. The Company shall, at all times, ensure that the vibration emissions from the Facility comply with the limits set out in Ministry Publication NPC-207.
 6. The Company shall operate any Equipment with Specific Operational Limits approved by this Approval in accordance with the Original ESDM Report.
 7. ALCF materials
 1. The Company shall ensure that ALCF are received, handled and tested in accordance with the requirements set out in O. Reg. 79/15 and ALCF Manual;
 1. The ALCF manual shall be updated as necessary or at the direction of the District Manager,
 2. all ALCF accepted and stored at the site shall be combusted in Kiln 4.
 3. The Company shall ensure that at all times when ALCF are co-fired with Conventional Fuels in the Kiln 4, the discharge from the Kiln 4 stack (source KILN4) and Kiln 4 bypass stack (source KILN4_BP) comply with the "Performance Limits - In Stack Emission Limits" specified in Schedule B of this Approval.
 4. The Company shall ensure that ALCF are co-fired with Conventional Fuels under following conditions only;
 1. All process interlocks, listed in the ALCF Process Controls and Interlocks document, are satisfied and all Kiln 4 CEM's and CPM's systems operate according to the Continuous Monitoring Plan;
 - i. All process interlocks and CPM systems, shall be installed, operated, maintained and calibrated according to ALCF Process Controls and Interlocks

- ii. ALCF Process Controls and Interlocks document shall be updated as necessary or at the direction of the District Manager or Manager;
 - iii. ALCF co-firing rate cannot be higher than co-firing rate of any representative mixture during the applicable Source Testing;
 - iv. ALCF co-firing rate shall not exceed 33% of heat replacement of Conventional Fuels at any time when ALCF are co-fired;
- 5. The Company shall ensure that all times when cement clinker is produced, the discharges from the Kiln 4 stacks and Kiln 4 bypass stack comply with the performance limits specified in Schedule B, Performance Limit - In Stack Emission Limits;
- 8. The Company shall install, operate and maintain baghouses leak detection systems according to the Baghouse Leak Detection Systems proposal;
 - 1. The Baghouse Leak Detection should be updated as necessary or at the direction of the District Manager;
- 9. The Facility shall ensure that SO₂ emissions from Kiln 4 stack and Kiln 4 bypass stack comply with limits listed in the SO_x Compliance Protocol document;
 - 1. SO_x Compliance Protocol document shall be updated as necessary or at the direction of the District Manager,
- 10. The Facility operations shall be performed to ensure that visible fugitive dust plum from activities where material is dropped (as described in BMPP);
 - 1. will not extend more than 30 metres in any direction from the activities, excluding no more than 6 minutes in any hour; and
 - 2. will not extend beyond the property lines at any time.
 - 3. visible fugitive dust emissions shall be determined as per Method 22, at the shortest practical observation distance as described in the Method 22.
- 11. The Company shall implement the BMPP for the control of fugitive dust emissions.
 - 1. The Company shall update the BMPP as necessary or at the direction of the District Manager.

5. DOCUMENTATION REQUIREMENTS

- 1. The Company shall maintain an up-to-date Log.
- 2. No later than June 30 in each year, the Company shall update the Acoustic Assessment Report and shall update the ESDM Report in accordance with section 26 of O. Reg. 419/05 so that the information in the reports is accurate as of December 31 in the previous year.
- 3. The Company shall make the Emission Summary Table (see section 27 of O. Reg. 419/05) and Acoustic Assessment Summary Table available for examination by any person, without charge, by posting it on the Internet or by making it available during

regular business hours at the Facility.

4. The Company shall, within three (3) months after the expiry of Condition 2.1 of this Approval, update the ESDM Report and the Acoustic Assessment Report such that the information in the reports is accurate as of the date that Condition 2.1 of this Approval expired.
5. Conditions 5.1 and 5.2 do not apply if Condition 2.1 has expired.

6. WRITTEN SUMMARY FORM

1. Subject to Condition 6.2, the Company shall prepare, and make available to the Ministry upon request, no later than August 31 of each year, a Written Summary Form signed by the Highest Ranking Person.
2. Condition 6.1 does not apply if:
 - a. Condition 2.1 has expired; and
 - b. the Written Summary Form has been completed for the year in which Condition 2.1 expired.

7. OPERATION AND MAINTENANCE

1. The Company shall prepare and implement, not later than three (3) months from the date of this Approval, operating procedures and maintenance programs for all Processes with Significant Environmental Aspects, which shall specify as a minimum:
 - a. frequency of inspections and scheduled preventative maintenance;
 - b. procedures to prevent upset conditions;
 - c. procedures to minimize all fugitive emissions;
 - d. procedures to prevent and/or minimize odorous emissions;
 - e. procedures to prevent and/or minimize noise emissions; and
 - f. procedures for record keeping activities relating to the operation and maintenance programs.
2. The Company shall ensure that all Processes with Significant Environmental Aspects are operated and maintained in accordance with this Approval, the operating procedures and maintenance programs.

8. COMPLAINTS RECORDING AND REPORTING

1. If at any time, the Company receives an environmental complaint from the public regarding the operation of the Equipment approved by this Approval, the Company shall take the following steps:
 - a. Record and number each complaint, either electronically or in a log book. The record shall include the following information: the time and date of the complaint and incident to which the complaint relates, the nature of the complaint, wind direction at the time and date of the incident to which the complaint relates and, if known, the

address of the complainant.

- b. Notify the District Manager of the complaint within two (2) business days after the complaint is received, or in a manner acceptable to the District Manager.
- c. Initiate appropriate steps to determine all possible causes of the complaint, and take the necessary actions to appropriately deal with the cause of the subject matter of the complaint.
- d. Complete and retain on-site a report written within five (5) business days of the complaint date. The report shall list the actions taken to appropriately deal with the cause of the complaint and set out steps to be taken to avoid the recurrence of similar incidents.

9. RECORD KEEPING REQUIREMENTS

1. Any information requested by any employee in or agent of the Ministry concerning the Facility and its operation under this Approval, including, but not limited to, any records required to be kept by this Approval, shall be provided to the employee in or agent of the Ministry, upon request, in a timely manner.
2. Unless otherwise specified in this Approval, the Company shall retain, for a minimum of five (5) years from the date of their creation all reports, records and information described in this Approval, including,
 - a. a copy of the Original ESDM Report and each updated version;
 - b. a copy of each version of the Acoustic Assessment Report;
 - c. supporting information used in the emission rate calculations performed in the ESDM Reports and Acoustic Assessment Reports;
 - d. the records in the Log;
 - e. copies of each Written Summary Form prepared under Condition 6.1 of this Approval;
 - f. records of maintenance, repair and inspection of Equipment related to all Processes with Significant Environmental Aspects; and
 - g. all records related to environmental complaints made by the public as required by Condition 8 of this Approval.
 - h. records of the clinker production and ALCF burning data, including but not limited to;
 - i. raw materials feed rate and clinker production rate in tonnes per day;
 - ii. burning ALCF rates for each approved category (as defined under Definition 8) in tonnes per day;
 - iii. Conventional Fuels burning rates in tonnes per day and normalized cubic metre for natural gas;
 - iv. records of any incidents related to Processes with Significant Environmental Aspects and ALCF handling and firing operations, including the corrective

- measures taken to address these incidents; and
- v. any start-up, shut-down and malfunction incidents.

10. REVOCATION OF PREVIOUS APPROVALS

1. This Approval replaces and revokes all Certificates of Approval (Air) issued under section 9 EPA and Environmental Compliance Approvals issued under Part II.1 EPA to the Facility in regards to the activities mentioned in subsection 9(1) of the EPA and dated prior to the date of this Approval.

11. CONTINUOUS MONITORING

1. Kiln 4 stack and Kiln 4 bypass stack;
 - a. The Company shall install the required CEM's and CPM's systems to continuously monitor and record the following parameters of the exhaust gas stream;
 - i. nitrogen oxides (NOx) concentration;
 - ii. sulphur dioxide (SO2) concentration;
 - iii. volumetric flow rate;
 - iv. temperature;
 - v. opacity
 - b. The Company shall operate and maintain the required CEM's systems according to Continuous Monitoring Plans;
 - i. the Continuous Monitoring Plans shall be amended as necessary or at the direction of the District Manager or Manager
2. Process parameters;
 - a. The Company shall operate and maintain all CPM's systems, including but not limited to the ALCF Process Controls and Interlocks CPM's, Kiln 4 and Kiln 4 bypass stacks CPM's, and any other CPM's for processes, having a significant environmental aspects, in accordance with good engineering practices and as recommended by the Equipment suppliers

12. NOISE ABATEMENT ACTION PLAN

1. The Company shall:
 - a. fully implement the Noise Abatement Action Plan specified in the Acoustic Assessment Report, not later than five (5) years after the date of issuance of the Approval;
 - b. ensure that the Noise Control Measures are properly maintained and continue to provide the acoustical performance outlined in the Acoustic Assessment Report.

13. ACOUSTIC AUDIT

1. The Company shall carry out acoustic audit measurements on the actual noise

emissions due to the operation of the Facility. The Company:

- a. shall carry out acoustic audit measurements in accordance with the procedures in Publication NPC-103;
 - b. shall submit an Acoustic Audit Report on the results of the Acoustic Audit, prepared by an Independent Acoustical Consultant, in accordance with the requirements of Publication NPC-233, to the District Manager and the Director not later than three (3) months after the full implementation of the Noise Abatement Action Plan.
2. The Director:
- a. may not accept the results of the Acoustic Audit if the requirements of Publication NPC-233 were not followed;
 - b. may require the Company to repeat the Acoustic Audit if the results of the Acoustic Audit are found unacceptable to the Director.

14. SOURCE TESTING

1. The Company shall perform Source Testing in accordance with the procedure in Schedule C and ALCF Source Testing Proposal to determine the rate of emission of the Test Contaminants specified in Schedule D from Tested Sources
2. The Company shall notify the District Manager in writing of the commissioning date and the commencement of operation of the ALCF system three (3) months before expected dates, or within a time frame as directed or agreed to in writing by the District Manager.
3. Source Testing shall be repeated once every calendar year in accordance with the procedure in Schedule C and ALCF Source Testing Proposal to determine the rate of emission of the Test Contaminants specified in Schedule D from the Tested Sources

15. CARBON DIOXIDE EMISSION INTENSITY TESTING

1. The Company shall perform Carbon-Dioxide Emission Intensity testing of the representative samples of the ALCF and Conventional Fuels at all times when Source Testing is carried out under Condition 14 of this Approval. Representative samples of the ALCF and Conventional Fuels used during the Source Testing events shall be used for performing Carbon-Dioxide Emission Intensity testing. The Carbon-Dioxide Emission Intensity testing shall be carried out in accordance with the requirements set out in O. Reg. 79/15.
2. The Company shall prepare a Carbon-Dioxide Emission Intensity report in respect of the ALCF combusted at the site, in accordance with the requirements set out in O. Reg. 79/15, that includes a statement that the Carbon-Dioxide Emission Intensity of the ALCF are less than the Carbon Dioxide Emission Intensity of the Conventional Fuels in the place of which the ALCF are proposed to be combusted.
3. The Company shall submit the Carbon-Dioxide Emission Intensity report along with the Source Testing report to the District Manager.

16. COMPLIANCE REPORTING

1. The Company shall prepare and submit by August 30 of each year to the District Manager, an Annual Report summarizing the operation of the Facility, covering the previous calendar year. The Annual Report shall include, as a minimum, the following information:
 - a. a statement of whether the Facility was in compliance with this Approval, including compliance with the Performance Limits;
 - b. the Emission Summary Table and Acoustic Assessment Summary Table for the Facility as of December 31 from the previous calendar year;
 - c. clinker and cement production in tonnes per year;
 - d. maximum daily feed rate and average daily feed rate of ALCF and Conventional Fuels in the cement kiln for each month of the preceding calendar year, and the weight percentage of each category of ALCF, as approved by this Approval, of the total monthly ALCF used.
 - e. maximum and average percent thermal replacement of Conventional Fuels by combined ALCF for each month;
 - f. a summary of data from CEM Systems, CPM Systems, Source Testing and Carbon Dioxide Emission Intensity testing and status of compliance with the Performance Limits and the ALCF operational requirements;
 - g. a summary of dates, duration and reasons for any operational events, that may have negatively impacted the quality of the environment and corrective measures taken to address these impacts;
 - h. details of environmental complaints including a summary of complaints received, causes of complaints and action taken to avoid the recurrence of similar incidents;
2. The Company shall make the Annual Report available for examination by any person by posting it on a Company website and making it available without charge during regular business hours at the Facility, immediately after it is submitted to the Ministry.

17. 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 changes to 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; and
 - 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.

SCHEDULE A

1. Environmental Compliance Approval Application, dated November 24, 2022, signed by Nektarios Papanicolaou, Environmental Manager and submitted by the Company;
2. Emission Summary and Dispersion Modelling Report, prepared by Jeff Zywicki (Golder Associates Ltd.) and dated November 24, 2022;
3. The letter (email) from Daniel Miller (Heidelberg Materials) dated March 15, 2024 .
4. Alternative Low Carbon Fuel Handling Procedures and Testing Manual Heidelberg Materials Ltd. - Picton Cement Plant, Version 2.0, dated March 2024, approved and signed by Carsten Schraeder - Plant Manager, as amended;
5. Environmental SOP, ALCF Process Controls and Interlocks, Version 1.1 dated March 7, 2024, approved and signed by Carsten Schraeder - Plant Manager, as amended;
6. "ALCF Source Testing Proposal" means the document entitled " Alternative Low Carbon Fuels (ALCF) Source Testing Proposal, Version 1.0" dated May 21, 2024, approved and signed by Carsten Schraeder - Plant Manager, as amended;
7. Environmental SOP, Dust Collector Emission Control Heidelberg Materials, Picton Plant" dated March 7, 2024, Version 1.1, approved and signed by Carsten Schraeder - Plant Manager, as amended;
8. Fugitive Dust -Best Management Practices Plan (BMPP), Heidelberg Materials Ltd. - Picton

Cement Plan, version 1.4 dated March 2024, approved and signed by Carsten Schraeder - Plan Manager, as amended;

9. Heidelberg Materials, Continuous Monitoring - QA/QC Plan - Picton Operations Kiln 4 Main Stack, Final Copy Rev.7 (TSS File No.:ER-SA-110223:24 dated 2024/03/21), as amended;
10. Heidelberg Materials, Continuous Monitoring - QA/QC Plan - Picton Operations Kiln 4 Bypass Stack, Final Copy Rev.7 (TSS File No.:ER-SA:110252:24 dated 2024/03/22), as amended.
11. Heidelberg Materials, Picton Plant, Production SOP, SOx Compliance Protocol for 2023 Regulatory Limit, Version 2.0, dated March 7, 2024, prepared by Dan Miller, Environmental Manager, approved and signed by Carsten Schraeder - Plan Manager, as amended;
12. Acoustic Assessment Report, prepared by Tomasz Nowak (Golder Associates Ltd.) and dated November 24, 2022.

SCHEDULE B

Performance Limits - In Stack Emission Limits

Parameter	Cement Kiln Stack Emission Limit	Verification of Compliance
Particulate Matter (PM)	50 mg/Rm ³	Results from the annual compliance source testing
Cadmium (Cd)	7 µg/Rm ³	Results from the annual compliance source testing
Lead (Pb)	60 µg/Rm ³	Results from the annual compliance source testing
Mercury (Hg)	20 µg/Rm ³	Results from the annual compliance source testing
Dioxins and Furans	80 pg/Rm ³ as TEQ	Results from the annual compliance source testing; results expressed as I-TEQ.
Hydrochloric Acid (HCl)	27 mg/Rm ³	Results from the annual compliance source testing
Nitrogen Oxides (NOx)	Not to exceed the in-stack NOx concentrations resulting from firing	Calculated as the rolling arithmetic average of 1 hour and 24 hours of data measured by the CEM

	Conventional Fuels	
Sulphur Dioxide (SO ₂)	Not to exceed the in-stack SO ₂ concentrations resulting from firing Conventional Fuels	Calculated as the rolling arithmetic average of 1 hour and 24 hours of data measured by the CEM
Total Hydrocarbon Compounds expressed as equivalent methane	100 ppmv measured on an undiluted bases	Results from the annual compliance source testing

Notes:

- R : Reference flue gas conditions, defined as follows:
 - Temperature 25 °C
 - Pressure 101.3 kPa
 - Oxygen content 11%
 - Water content nil (dry conditions)
- mg/Rm³ - milligrams per cubic metre of gas at Reference conditions.
- µg/Rm³ - micrograms per cubic metre of gas at Reference conditions.
- pg/Rm³ - picograms per cubic metre of gas at Reference conditions.
- ppmv - parts per million by volume
- TEQ - total toxicity equivalent concentration contributed by all dioxin-like compounds in the mixture, as per ACB List, Table 1.

SCHEDULE C

SOURCE TESTING PROCEDURES

1. The Company shall submit, not later than three (3) months after the date of this Approval for Base Line Emissions and not later than three (3) months before the date of commencement of operation of the ALCF system, to the Manager a Pre-Test Plan for the Source Testing required under this Approval.
2. The Company shall finalize the Pre-Test Plan in consultation with the Manager.
3. The Company shall not commence the Source Testing required under this Approval until the Manager has accepted the Pre-Test Plan.
4. The Company shall complete the Source Testing, no later than three (3) months after the Manager has approved the Pre-Test Plan or a date agreed upon in consultation with the District Manager.
5. For subsequent Source Testing under Condition 14 of this Approval:
 1. The Company shall submit either a written notification of intent to use a previously approved Pre-Test Plan (with version reference if there were more than one (1) previously approved Pre-Test Plan), or a new Pre-Test Plan, to the Manager and Director not later than three (3) months prior to the planned date of the Source Testing

for approval. The written notification or the new Pre-Test Plan shall also include information on the blend (s) of Alternative Low-Carbon Fuel and the quantity proposed to be used for the Source Testing, along with details regarding the process for selection of the blend (s) for Source Testing for its finalization in consultation with the Manager and the Director.

2. If the Company submitted a written notification of intent to use a previously approved Pre-Test Plan, the Manager may either accept the use of a previously approved Pre-Test Plan, or request the submission of a new Pre-Test Plan for approval. The Company shall submit the requested new Pre-Test Plan within two (2) months after the Manager requested the submission.
3. The Company shall complete the subsequent Source Testing no later than three (3) months after the Manager has either agreed with the written notification or approved the new Pre-Test Plan.
6. 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.
7. 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. results of Source Testing, including the emission rate, emission concentration and relevant emission factors of the Test Contaminants;
 3. records of operating conditions at the time of Source Testing and other information including but not limited to:
 - a. an executive summary
 - b. a summary of the results of the fuel analysis program;
 - c. a summary of records as specified in this Approval and records of operating conditions at the time of Source Testing, including but not limited to:
 - i. Clinker production rate in tonnes/hour;
 - ii. Conventional Fuels firing rate in kiln in tonnes per hour and tonnes per day;
 - iii. Each category of the ALCF, as defined in Definition 8, fired in the kiln in tonnes per hour and tonnes per day;
 - d. any other records that may affect the Source Testing results.
 4. A summary of all records of the CEM Systems and CPM Systems during the time of Source Testing;
 5. A summary table that compares the recent Source Testing results to the emission estimates described in the Company's ESDM Report; previous results for Base Line emissions testing; previous result for ALCF emission testing; and the Performance

Limits;

8. The Director may not accept the results of the Source Testing if:
 1. the Source Testing Code or the requirements of the Manager were not followed;
 2. the Company did not notify the District Manager, the Manager and the Director of the Source Testing; or
 3. the Company failed to provide a complete report on the Source Testing.
9. If the Director does not accept the results 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.
10. If the Source Testing results are higher than the emission estimates in the Company's ESDM Report, the Company shall update their ESDM Report in accordance with Section 26 of O. Reg. 419/05 with the results from the Source Testing report and make these records available for review by staff of the Ministry upon request. The updated Emission Summary Table from the updated ESDM Report shall be submitted with the report on the Source Testing.
11. The Company shall ensure that the above mentioned Source Testing report is made available and easily accessible for review by the public at the Facility immediately after the document is submitted to the Ministry.

SCHEDULE D

TEST CONTAMINANTS

- Total Suspended Particulate Matter
- Total Hydrocarbon Compounds
- Hydrogen Chloride
- Benzo(a)pyrene (as a surrogate of total Polycyclic Aromatic Hydrocarbons (PAHs))
- Naphthalene

List of Metals

- Antimony
- Arsenic
- Barium
- Beryllium
- Cadmium
- Chromium
- Cobalt
- Copper

- Lead
- Mercury
- Molybdenum
- Nickel
- Selenium
- Silver
- Thallium
- Vanadium
- Zinc

List of Dioxins, Furans and Dioxin-like PCBs

- As per ACB List Table 1: Dioxins

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

1. GENERAL

Condition No. 1 is included to require the Approval holder to build, operate and maintain the Facility in accordance with the Supporting Documentation in Schedule A considered by the Director in issuing this Approval.

2. LIMITED OPERATIONAL FLEXIBILITY, REQUIREMENT TO REQUEST AN ACCEPTABLE POINT OF IMPINGEMENT CONCENTRATION AND PERFORMANCE LIMITS

Conditions No. 2, 3 and 4 are included to limit and define the Modifications permitted by this Approval, and to set out the circumstances in which the Company shall request approval of an Acceptable Point of Impingement Concentration prior to making Modifications. The holder of the Approval is approved for operational flexibility for the Facility that is consistent with the description of the operations included with the application up to the Facility Production Limit. In return for the operational flexibility, the Approval places performance based limits that cannot be exceeded under the terms of this Approval. Approval holders will still have to obtain other relevant approvals required to operate the Facility, including requirements under other environmental legislation such as the Environmental Assessment Act.

3. DOCUMENTATION REQUIREMENTS

Condition No. 5 is included to require the Company to maintain ongoing documentation that demonstrates compliance with the performance limits as specified in Condition 4 of this Approval and allows the Ministry to monitor on-going compliance with these performance limits. The Company is required to have an up to date ESDM Report and Acoustic Assessment Report that describe the Facility at all times and make the Emission Summary Table and Acoustic Assessment Summary Table from these reports available to the public on an ongoing basis in order to maintain public communication with regard to the

emissions from the Facility.

4. WRITTEN SUMMARY FORM

Condition No. 6 is included to require the Company to prepare, and make available to the Ministry upon request, a yearly Written Summary Form, to assist the Ministry with the review of the site's compliance with the EPA, the regulations and this Approval.

5. OPERATION AND MAINTENANCE

Condition No. 7 is included to require the Company to properly operate and maintain the Processes with Significant Environmental Aspects to minimize the impact to the environment from these processes.

6. COMPLAINTS RECORDING AND REPORTING PROCEDURE

Condition No. 8 is included to require the Company to respond to any environmental complaints regarding the operation of the Equipment, according to a procedure that includes methods for preventing recurrence of similar incidents and a requirement to prepare and retain a written report.

7. RECORD KEEPING REQUIREMENTS

Condition No. 9 is included to require the Company to retain all documentation related to this Approval and provide access to employees in or agents of the Ministry, upon request, so that the Ministry can determine if a more detailed review of compliance with the performance limits as specified in Condition 4 of this Approval is necessary.

8. REVOCATION OF PREVIOUS APPROVALS

Condition No. 10 is included to identify that this Approval replaces all Section 9 Certificate(s) of Approval and Part II.1 Approvals in regards to the activities mentioned in subsection 9(1) of the EPA and dated prior to the date of this Approval.

9. EMISSION MONITORING AND SOURCE TESTING

Condition Nos. 11, 14 and 15 are to require the Company to gather and retain accurate information so that compliance with the EPA, O. Reg. 419/05, O.Reg. 79/15 and this Approval may be verified.

10. NOISE ABATEMENT ACTION PLAN

Condition No. 12 is included to require the Company to implement a Noise Abatement Action Plan designed to ensure that the noise emissions from the Facility will be in compliance with applicable limits set in the Ministry's noise guidelines.

11. ACOUSTIC AUDIT

Condition No. 13 is included to require the Company to gather accurate information and submit an Acoustic Audit Report in accordance with procedures set in the Ministry's noise guidelines, so that the environmental impact and subsequent compliance with the EPA, the regulation and this Approval can be verified.

12. COMPLIANCE REPORTING

Condition No. 16 is included to require the Company to provide an Annual Report to the Ministry and the public, to assist the Ministry with the review of the site's compliance with the EPA, the regulations and this approval and to ensure that the public has access to information on the environmental impacts of the Facility.

13. CHANGE OF OWNERSHIP

Condition No. 17 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.

Upon issuance of the environmental compliance approval, I hereby revoke Approval No(s). 0073-BHGQHC issued on October 31, 2019.

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 30th day of May, 2024



Miroslav Ubovic, P.Eng.

Director

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

JK/

c: Area Manager, MECP Belleville

c: District Manager, MECP Kingston - District
Jamie McEvoy, WSP Canada Inc.