

ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 5224-D79SZD
Issue Date: July 29, 2024

Spectra Aluminum Products Ltd.
25 Reagens Industrial Pky
Bradford West Gwillimbury, Ontario
L3Z 2A4

Site Location: 25 Reagens Industrial Parkway
25 Reagens Industrial Pky
Bradford West Gwillimbury Town, County of Simcoe
L3Z 2A4

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) anodizing tanks controlled by the following:
 - one (1) exhaust system, equipped with a scrubber using a mesh pad mist eliminator, discharging to the air at a maximum volumetric flow rate of 14.2 cubic metres per second through a stack (ID: S-26) having an exit diameter of 1.02 metres, extending 1.52 metres above the roof, and 10.62 metres above grade; and
 - one (1) exhaust system, equipped with a scrubber using a mesh pad mist eliminator, discharging to the air at a maximum volumetric flow rate of 14.2 cubic metres per second through a stack (ID: S-35) having an exit diameter of 0.61 metre, extending 5.4 metres above the roof, and 14.5 metres above grade;
- one (1) bright dip tank served by a wet scrubber, having a a removal efficiency of 75%, discharging to the air through two (2) separate exhaust systems as follows:
 - one (1) exhaust system discharging to the air at a maximum volumetric flow rate of 14.2 cubic metres per second through a stack (ID: S-27) having an exit diameter of 0.61 metre, extending 3.05 metres above the roof, and 12.15 metres above grade; and
 - one (1) exhaust system discharging to the air at a maximum volumetric flow rate of 16.5 cubic metres per second through a stack (ID: S-34) having an exit diameter of 0.61 metre, extending

4.57 metres above the roof, and 13.67 metres above grade;

- two (2) natural gas-fired process boilers, each having a maximum heat input of 4,431,000 kilojoules per hour, and each discharging to the air through a separate stack (IDs: S-14 and S-15) at a maximum volumetric flow rate of 0.4 cubic metre per second, with each stack having an exit diameter of 0.3 metre, extending 1.93 metres above the roof, and 11.03 metres above grade;
- fugitive emissions from the Deox Tank and Etch Tank processes discharged to the air via the building general ventilation (IDs: S-09 and S-25);
- chemical storage tanks area;

all in accordance with the Environmental Compliance Approval Application, dated June 26, 2023, and signed by Mihai Vlasceanu, VP Technical Services; the supporting Emission Summary and Dispersion Modelling Report prepared by Nadan Consulting Ltd., dated June 2023, and signed by Wendy Nadan; the supporting Acoustic Assessment Report prepared by Northern Applied Sciences Inc., dated August 8, 2023, and signed by Stephen Kuchma, P.Eng.; and the additional information submitted by Wendy Nadan, Nadan Consulting Ltd. via email on July 16, 2024.

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

1. "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;
2. "Acoustic Assessment Report" means the report, prepared in accordance with Publication NPC-233, by Stephen Kuchma/Northern Applied Sciences Inc. and dated August 8, 2023 submitted in support of the application, that documents all sources of noise emissions and Noise Control Measures present at the Facility;
3. "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;
4. "Acoustic Audit Report" means a report presenting the results of an Acoustic Audit, prepared in accordance with Publication NPC-233;
5. "Approval" means this Environmental Compliance Approval, including the application and supporting documentation listed above;
6. "Building Code Act, 1992" means the Building Code Act, S.O. 1992, c.23, as amended and any replacement or successor legislation;

7. "Company" means Spectra Aluminum Products 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;
8. "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;
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;
11. "Equipment" means the equipment and processes 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. "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;
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; and
16. "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 August 8, 2023, submitted by Northern Applied Sciences Inc. and prepared by Stephen Kuchma;
17. "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, Schedule A of this Approval and in the supporting documentation referred to herein, including the Acoustic Assessment Report, to the extent approved by this Approval; and the ministry of the government of Ontario responsible for the EPA and includes all officials, employees or other persons acting on its behalf;
18. "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;

19. "Publication NPC-233" means the Ministry Publication NPC-233, "Information to be Submitted for Approval of Stationary Sources of Sound", October, 1995 as amended; and
20. "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; and
 - iv. all appropriate measures to minimize noise and dust emissions from all potential sources;
 - 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.

5. CHANGE OF OWNERSHIP

1. The Company shall notify the Director in writing, and forward a copy of the notification to the District Manager, within thirty (30) days of the occurrence of any of the following 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; or
 - 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.

6. NOISE ABATEMENT ACTION PLAN

1. The Company shall:
 - a. fully implement the Noise Abatement Action Plan specified in the Acoustic Assessment Report and described in Schedule A of this Approval; and
 - b. ensure that the Noise Control Measures are properly maintained and continue to provide the acoustical performance outlined in the Acoustic Assessment Report.

7. 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; and
 - 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 eighteen (18) months from the issuance of an above grade building permit and verified site inspection under the Building Code Act, 1992, for a building that will host a noise sensitive space on the vacant Agricultural (A) zoned lands located west of the Facility representing POR2 or POR3.
2. The Director:
 - a. may not accept the results of the Acoustic Audit if the requirements of Publication NPC-233 were not followed; and
 - b. may require the Company to repeat the Acoustic Audit if the results of the Acoustic Audit are found unacceptable to the Director.

SCHEDULE A

Noise Abatement Action Plan

The Company shall implement the noise control measures as outlined in section 7 of the Acoustic Assessment Report dated August 8, 2023, submitted by Northern Applied Sciences Inc. and prepared by Stephen Kuchma, by not later than twelve (12) months from the issuance of an above grade building permit and verified site inspection under the Building Code Act, 1992, for a building that will host a noise sensitive space on the vacant Agricultural (A) zoned lands located west of the Facility representing POR2 or POR3.

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.
5. Condition No. 5 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.
6. Condition No. 6 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.
7. Condition No. 7 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.

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 29th day of July, 2024



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

ES/
c: District Manager, MECP Barrie
Wendy Nadan, Nadan Consulting Ltd