

AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 6781-D9DKQ2
Issue Date: October 25, 2024

Carmeuse Lime (Canada) Limited
374681 Oxford County Road 6
Ingersoll, Ontario
N5C 3J6

Site Location: Carmeuse Lime (Canada) Limited - Beachville Operation
374681 Oxford County Road 6 Lot 15 to 18, Concession 2 & 3
Ingersoll Town, Restructured County of Oxford

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 lime manufacturing facility, consisting of the following processes and support units:

- Quarry operations - limestone extraction.
- Limestone processing including crushing and screening.
- Limestone calcination in lime kilns using natural gas and coal as fuel.
- Lime hydration.
- Material delivery, storage, processing and transfers.
- Fuels processing, storage and handling.

including the Equipment and any other ancillary and support processes and activities, operating at a Facility Production Limit of up to the following quantities, discharging to the air as described in the Original ESDM Report:

- 3,630,000 tonnes per year of limestone extracted.
- 658 tonnes per day of lime produced in Kiln No. 1.
- 590 tonnes per day of lime produced in Kiln No. 3.

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", 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 Stantec Consulting Ltd. and dated February 8, 2024 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. "Approval" means this entire Environmental Compliance Approval and any Schedules to it;
9. "Basic Comprehensive User Guide" means the Ministry document titled "Basic Comprehensive Certificates of Approval (Air) User Guide" dated March 2011, as amended;
10. "Best Management Practices Plan" means the document titled "Best Management Practices For Control Of Fugitive Dust - Carmeuse Lime (Beachville)", March 30, 2023, Revision 1, as amended;
11. "Company" means Carmeuse Lime (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;
12. "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;
13. "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;
14. "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;
15. "District Manager" means the District Manager of the appropriate local district office of the Ministry, where the Facility is geographically located;
16. "Emission Summary Table" means a table described in paragraph 14 of subsection 26 (1) of O. Reg. 419/05;
17. "Environmental Assessment Act" means the *Environmental Assessment Act*, R.S.O. 1990, c.E.18;
18. "EPA" means the *Environmental Protection Act*, R.S.O. 1990, c.E.19;
19. "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;
20. "Equipment with Specific Operational Limits" means 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;
21. "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;

22. "Facility" means the entire operation located on the property where the Equipment is located;
23. "Facility Production Limit" means the production limit placed by the Director on the main product(s) or raw materials used by the Facility;
24. "Highest Ranking Person" means the highest ranking person regularly present at the Facility who has management responsibilities relating to the Facility;
25. "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;
26. "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;
27. "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;
28. "Ministry" means the ministry of the Minister;
29. "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;
30. "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 February 8, 2024, prepared by Stantec Consulting Ltd. and signed by Fabian Alvarado, Deborah Hunt-Kansal and Gregory Crooks;
31. "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 D of this Approval and in the supporting documentation referred to herein, including the Acoustic Assessment Report, to the

extent approved by this Approval;

32. "O. Reg. 419/05" means Ontario Regulation 419/05: Air Pollution – Local Air Quality, made under the EPA;
33. "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 Stantec Consulting Ltd. and dated March 30, 2023, submitted in support of the application, and includes any changes to the report made up to the date of issuance of this Approval;
34. "Point of Impingement" has the same meaning as in section 2 of O. Reg. 419/05;
35. "Point of Reception" means Point of Reception as defined by Publication NPC-300;
36. "Pre-Test Plan" means a plan for the Source Testing including the information required in Section 5 of the Source Testing Code;
37. "Procedure Document" means Ministry guidance document titled "Procedure for Preparing an Emission Summary and Dispersion Modelling Report" dated March 2018, as amended;
38. "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;
39. "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;
40. "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;
41. "Publication NPC-233" means the Ministry Publication NPC-233, "Information to be Submitted for Approval of Stationary Sources of Sound", October, 1995, as amended;
42. "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;
43. "Schedules" means the following schedules attached to this Approval and forming part of this Approval namely:
 - Schedule A - Supporting Documentation
 - Schedule B - Procedure for Source Testing
 - Schedule C - Test Contaminants

- Schedule D - Noise Abatement Action Plan
44. "Source Testing" means sampling and testing to measure emissions resulting from operating the test sources under conditions which yield the worst case emissions within the approved operating range of the test sources which satisfies paragraph 1 of subsection 11(1) of O. Reg. 419/05;
 45. "Source Testing Code" means the Ontario Source Testing Code, dated June 2010, prepared by the Ministry, as amended;
 46. "Test Contaminants" means the contaminants listed in Schedule C;
 47. "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
 48. "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:
 - Schedule A - Supporting Documentation
 - Schedule B - Procedure for Source Testing
 - Schedule C - Test Contaminants
 - Schedule D - Noise Abatement Action Plan

2. 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:
 - a. are within the scope of the operations of the Facility as described in the Description Section of this Approval;

- b. do not result in an increase of the Facility Production Limit above the level specified in the Description Section of this Approval; and
 - c. result in compliance with the performance limits as specified in Condition 4.
2. Condition 2.1 does not apply to,
- a. 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; and
 - b. Modifications to the Facility that would be subject to the Environmental Assessment Act.
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:
 - a. The Compound of Concern was not a Compound of Concern in the previous version of the ESDM Report and
 - i. the concentration of the Compound of Concern exceeds the concentration set out for the contaminant in the ACB list; or
 - ii. the Compound of Concern is not identified in the ACB list; or
 - b. The concentration of the Compound of Concern in the updated ESDM Report exceeds the higher of,
 - i. the most recent Acceptable Point of Impingement Concentration, and
 - ii. 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,
 - a. revise and resubmit the request; or
 - b. 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,
 - a. 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
 - b. 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,
 - i. if an Acceptable Point of Impingement Concentration exists, the most recent Acceptable

Point of Impingement Concentration, and

- ii. 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 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.
4. 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.
5. The Company shall operate any Equipment with Specific Operational Limits approved by this Approval in accordance with the Original ESDM Report.

5. DOCUMENTATION REQUIREMENTS

1. The Company shall maintain an up-to-date Log.
2. No later than March 31 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 June 30 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 and procedures for inspections and scheduled preventative maintenance for equipment, including but not limited to, all bag houses and electrostatic precipitators;
 - b. procedures to minimize 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. FUGITIVE EMISSIONS CONTROL

1. The Company shall update as necessary and implement the Best Management Practices Plan for the control of fugitive dust emissions.
2. The Company shall:
 - a. review and evaluate the Best Management Practices Plan on an annual basis;
 - b. record the results of each annual review and update as required the Best Management Practices Plan within two (2) months of the completion of the annual review;
 - c. maintain the updated Best Management Practices Plan at the Facility;
 - d. implement, at all times, the most recent version of the Best Management Practices Plan.
3. The Company shall record and retain such records, each time a specific preventative and control measure described in the Best Management Practices Plans 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.

9. SOURCE TESTING

1. The Company shall perform Source Testing in accordance with the procedure in **Schedule B** to determine the rate of emission of the Test Contaminants specified in **Schedule C** from Lime Kiln No. 1. Source Testing shall be conducted not later than twelve (12) months from the date of issue of this Approval, or within a time frame as directed or agreed to in writing by the District Manager.
2. The Source Testing required under Condition 9.1 of this Approval shall be conducted when Lime Kiln No. 1 is fired with the fuel mix containing natural gas at one hundred (100) percent of the thermal input of Lime Kiln No. 1, required for the production of a maximum of 658 tonnes per day of lime, or at a natural gas firing rate agreed to in writing by the Manager, subject to the condition that operational checks of the kiln is accepted by the Company.
3. The Source Testing required under Condition 9.1 of this Approval shall be repeated if coal is intended to be used as part of the fuel mix in any of the lime kilns at the Facility. If coal is intended to be used, the Company shall :
 - a. notify the District Manager of the date of commencement of coal use and the intended fuel mix, including the maximum percent of the thermal input of the lime kilns for natural gas and for coal, a minimum of one (1) month prior to the date of commencement of the planned use of coal and within twenty four (24) hours of the emergency use of coal;
 - b. perform Source Testing in accordance with the procedure in **Schedule B** to determine the rate of emission of the Test Contaminants specified in **Schedule C** from Lime Kiln No. 1 or Lime Kiln No. 3 combusting the fuel mix including coal. Source Testing shall be conducted not later than six (6) months from the date of commencement of coal use, or within a time frame as directed or agreed to in writing by the District Manager; and

- c. Source Testing required under Condition 9.3.b of this Approval shall be conducted when the lime kiln is fired with the intended fuel mix notified in Condition 9.3.a. of this Approval, required for the the maximum lime production of the kiln being tested, or at a firing rate agreed to in writing by the Manager and District Manager, subject to the condition that operational checks of the lime kiln is accepted by the Company.

10. CONTINUOUS MONITORING

1. The Company shall ensure that the existing continuous monitoring and recording systems are fully operational when the Lime Kilns No. 1 and No. 3 are in operation, to continuously monitor opacity in the gas stream leaving the lime kilns.
2. The continuous monitoring and recording systems specified in condition 10.1 shall be operated, calibrated and maintained in accordance with a continuous monitoring and recording plan, complete with specifications based on manufacturer's specifications.
3. The Company shall record and retain on-site all data generated by the continuous opacity monitors and the records related to their calibration and maintenance.

11. 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.

12. 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;
 - g. all records related to Fugitive Emissions Control as required by Condition 8 of this Approval.
 - h. all records related to environmental complaints made by the public as required by Condition 11 of this Approval.
 - i. all records related to Source Testing as required by Condition 9 of this Approval;
 - j. all records related to Continuous Monitoring as required by Condition 10 of this Approval;
and
 - k. all records of any upset conditions associated with the operation of the air pollution control equipment including baghouses and electrostatic precipitators.

13. 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.

14. 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.

15. 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 D of this Approval,
 - b. ensure that the Noise Control Measures are properly maintained and continue to provide the acoustical performance outlined in the Acoustic Assessment Report.

16. 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 six (6) months after the full implementation of the Noise Abatement Action Plan, or within a time frame as directed or agreed to in writing by the District Manager.
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

Supporting Documentation

1. Environmental Compliance Approval Application, dated March 7, 2023, signed by Christopher Martin and submitted by the Company.
2. Emission Summary and Dispersion Modelling Report, prepared by Stantec Consulting Ltd., signed by Gregory Crooks and Christopher Martin and dated March 30, 2023.
3. Technical memorandum dated April 5, 2024 with additional air emissions information and clarifications provided by Stantec Consulting Ltd., and signed by Kimberly Ireland.
4. Air emissions and maintenance procedures related clarification and information provided by emails dated May 14, 2024, August 9, 2024 by Stantec Limited, and email dated October 22, 2024 by Christopher Martin.
5. Updated Emission Summary Table provided by email dated October 9, 2024 by Stantec Limited.
6. Acoustic Assessment Report, prepared by Stantec Consulting Ltd., signed by Fabian Alvarado, Deborah Hunt-Kansal and Gregory Crooks and dated February 8, 2024.

SCHEDULE B

PROCEDURE FOR SOURCE TESTING

1. The Company shall submit, not later than three (3) months prior to the Source Testing, to the Manager, a Pre-Test Plan for the Source Testing required under this Approval. The Company shall finalize the Pre-Test Plan in consultation with the Manager.
2. The Company shall not commence the Source Testing until the Manager has accepted the Pre-Test Plan.
3. For subsequent Source Testing under Condition 9.3.b 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 fuel mix proposed to be used for the duration of the Source Test including the maximum percent of the thermal input of the lime kilns, individually for natural gas and for coal.
 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 one (1) month 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.
4. The Company shall notify the District Manager and the Manager 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.
5. The Company shall submit a report (electronic format) on the Source Testing to the District Manager, the 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. Facility/process information related to the operation of the Lime Kiln tested, including but not limited to:
 - a. Lime Kiln production rate in tonnes/hour and tonnes/day at the time of source testing and its percentage of the maximum operating capacity;
 - b. Hourly fuel firing rate for coal and/or natural gas along with their percentages of kiln thermal

input;

3. a summary of all records of the continuous opacity monitor during the time of Source Testing;
 4. the results of Source Testing, including the emission rates, emission concentrations and the relevant emission factors of the Test Contaminants; and
 5. a tabular comparison of the calculated emission rates and emission factors based on Source Testing results for the Test Contaminants to the relevant estimates described in the ESDM Report.
6. 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 and the Manager of the Source Testing; or
 3. the Company failed to provide a complete report on the Source Testing.
7. 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.
8. The Company shall update their ESDM Report in accordance with Section 26 of O. Reg. 419/05 and the Procedure Document with the results from the Source Testing, if any of the calculated emission factors or calculated emission rates are higher than the predicted rates in the ESDM Report, not later than three (3) months after the submission of the Source Testing report and make these records available for review by staff of the Ministry upon request.

SCHEDULE C

TEST CONTAMINANTS

- Nitrogen Oxides
- Sulphur Dioxide
- Carbon Monoxide
- Total Suspended Particulate Matter
- Hydrogen Chloride
- Calcium Oxide
- Organic Matter - Total (expressed as equivalent methane)
- Benzo(a)pyrene (as a surrogate of Polycyclic Aromatic Hydrocarbons (PAHs))
- Naphthalene

Metals

- Antimony
- Arsenic
- Barium
- Beryllium
- Cadmium
- Chromium
- Cobalt
- Copper
- Iron
- Lead
- Manganese
- Mercury
- Molybdenum
- Nickel
- Selenium
- Silver
- Thallium
- Vanadium
- Zinc

SCHEDULE C

Dioxins, Furans and Dioxin-like PCBs (Polychlorinated Biphenyls)

Toxicity equivalency factors (TEFs) are applied to 29 isomers of dioxins, furans and dioxin-like PCBs to convert them into 2,3,7,8-CDD (tetrachlorodibenzo-p-dioxin) toxicity equivalents (TEQ). The conversion involves multiplying the concentration of each isomer by the appropriate TEF to yield the TEQ for this isomer. Summing the individual TEQ values for each of the isomers provides the total toxicity equivalent level for the sample mixture.

A table listing the isomers and their TEFs can be found in the Ministry publication titled “Air Contaminants Benchmarks (ACB) List: Standards, guidelines and screening levels for assessing point of impingement concentrations of air contaminants”, as amended from time to time.

No.	Dioxins, Furans, and Dioxin-like PCBs	CASRN	WHO ₂₀₀₅ Toxic Equivalency Factors [TEFs]
1	2,3,7,8-Tetrachlorodibenzo-p-dioxin [2,3,7,8-TCDD]	1746-01-6	1
2	1,2,3,7,8-Pentachlorodibenzo-p-dioxin [1,2,3,7,8-PeCDD]	40321-76-4	1
3	1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin [1,2,3,4,7,8-HxCDD]	39227-28-6	0.1
4	1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin [1,2,3,6,7,8-HxCDD]	57653-85-7	0.1
5	1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin [1,2,3,7,8,9-HxCDD]	19408-74-3	0.1
6	1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin [1,2,3,4,6,7,8-HpCDD]	35822-46-9	0.01
7	1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin [1,2,3,4,6,7,8,9-OCDD]	3268-87-9	0.0003
8	2,3,7,8-Tetrachlorodibenzofuran [2,3,7,8-TCDF]	51207-31-9	0.1
9	1,2,3,7,8-Pentachlorodibenzofuran [1,2,3,7,8-PeCDF]	57117-41-6	0.03
10	2,3,4,7,8-Pentachlorodibenzofuran [2,3,4,7,8-PeCDF]	57117-31-4	0.3
11	1,2,3,4,7,8-Hexachlorodibenzofuran [1,2,3,4,7,8-HxCDF]	70648-26-9	0.1
12	1,2,3,6,7,8-Hexachlorodibenzofuran [1,2,3,6,7,8-HxCDF]	57117-44-9	0.1
13	1,2,3,7,8,9-Hexachlorodibenzofuran [1,2,3,7,8,9-HxCDF]	72918-21-9	0.1

SCHEDULE C

No.	Dioxins, Furans, and Dioxin-like PCBs	CASRN	WHO ₂₀₀₅ Toxic Equivalency Factors [TEFs]
14	2,3,4,6,7,8-Hexachlorodibenzofuran [2,3,4,6,7,8-HxCDF]	60851-34-5	0.1
15	1,2,3,4,6,7,8-Heptachlorodibenzofuran [1,2,3,4,6,7,8-HpCDF]	67562-39-4	0.01
16	1,2,3,4,7,8,9-Heptachlorodibenzofuran [1,2,3,4,7,8,9-HpCDF]	55673-89-7	0.01
17	1,2,3,4,6,7,8,9-Octachlorodibenzofuran [1,2,3,4,6,7,8,9-OCDF]	39001-02-0	0.0003
18	3,3',4,4'-Tetrachlorobiphenyl [3,3',4,4'-tetraCB (PCB 77)]	32598-13-3	0.0001
19	3,4,4',5- Tetrachlorobiphenyl [3,4,4',5-tetraCB (PCB 81)]	70362-50-4	0.0003
20	3,3',4,4',5- Pentachlorobiphenyl (PCB 126) [3,3',4,4',5-pentaCB (PCB 126)]	57465-28-8	0.1
21	3,3',4,4',5,5'- Hexachlorobiphenyl [3,3',4,4',5,5'-hexaCB (PCB 169)]	32774-16-6	0.03
22	2,3,3',4,4'- Pentachlorobiphenyl [2,3,3',4,4'-pentaCB (PCB 105)]	32598-14-4	0.00003
23	2,3,4,4',5- Pentachlorobiphenyl [2,3,4,4',5-pentaCB (PCB 114)]	74472-37-0	0.00003
24	2,3',4,4',5- Pentachlorobiphenyl [2,3',4,4',5-pentaCB (PCB 118)]	31508-00-6	0.00003
25	2',3,4,4',5- Pentachlorobiphenyl [2',3,4,4',5-pentaCB (PCB 123)]	65510-44-3	0.00003
26	2,3,3',4,4',5- Hexachlorobiphenyl [2,3,3',4,4',5-hexaCB (PCB 156)]	38380-08-4	0.00003
27	2,3,3',4,4',5'- Hexachlorobiphenyl [2,3,3',4,4',5'-hexaCB (PCB 157)]	69782-90-7	0.00003
28	2,3',4,4',5,5'- Hexachlorobiphenyl [2,3',4,4',5,5'-hexaCB (PCB 167)]	52663-72-6	0.00003
29	2,3,3',4,4',5,5'- Heptachlorobiphenyl [2,3,3',4,4',5,5'-heptaCB (PCB 189)]	39635-31-9	0.00003

SCHEDULE C

NOTE:

The TEF scheme is intended to be used with isomer specific analytical results. In cases where results are reported by congener group only, staff at Ministry's Technical Assessment and Standards Development Branch shall be contacted for appropriate procedures to convert non-isomer specific data to TEQs.

SCHEDULE D

Noise Abatement Action Plan

The Noise Abatement Action Plan shall consist of the Noise Control Measures identified as Stage 1, Stage 2, and Stage 3. The Noise Abatement Action Plan shall be implemented according to the following schedule:

- 12 months after the date of issuance of the Approval – complete Stage 1 Noise Control Measures;
- 24 months after the date of issuance of the Approval – complete Stage 2 Noise Control Measures;
- 36 months after the date of issuance of the Approval – complete Stage 3 Noise Control Measures, representing completion of the Noise Abatement Action Plan.

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. 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. FUGITIVE EMISSIONS CONTROL

Condition No. 8 is included to emphasize that the Equipment and Facility must be maintained and operated in accordance with a procedure that will result in compliance with the EPA, Regulation 419/05 and this Approval and to require the Company to keep records and to provide information to staff of the Ministry so that compliance with the EPA, Regulation 419/05 and this Approval may be verified.

7. MONITORING AND TESTING

Condition No. 9 and 10 is included to require the Company to gather and retain accurate information so that compliance with the EPA, O. Reg. 419/05 and this Approval may be verified.

8. COMPLAINTS RECORDING AND REPORTING PROCEDURE

Condition No. 11 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.

9. RECORD KEEPING REQUIREMENTS

Condition No. 12 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.

10. CHANGE OF OWNERSHIP

Condition No. 13 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.

11. REVOCATION OF PREVIOUS APPROVALS

Condition No. 14 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.

12. NOISE ABATEMENT ACTION PLAN

Condition No. 15 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.

13. ACOUSTIC AUDIT

Condition No. 16 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.

Upon issuance of the environmental compliance approval, I hereby revoke Approval No(s). 0501-867L9G issued on December 15, 2010

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

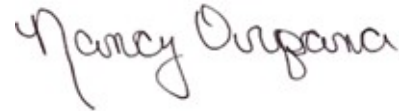
The Director appointed for the purposes of
Part II.1 of the *Environmental Protection Act*
Ministry of the Environment,
Conservation and Parks
135 St. Clair Avenue West, 1st Floor
Toronto, Ontario
M4V 1P5

*** 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 25th day of October, 2024



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

SA/

c: District Manager, MECP London - District
Gregory Crooks, Stantec Consulting Ltd.