

AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER A540205

Issue Date: December 5, 2020

Oddo Grottoli Industrial Waste Renewal Inc.
25 Duhamel Rd
Sudbury, Ontario
P3Y 1L3

Site Location: 2765 Southview Drive
Greater Sudbury City, District of Sudbury
P3G 1H1

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:

a Waste Disposal Site

to be used for the transfer and processing of the following types of waste:

Non-hazardous solid industrial waste, liquid industrial waste and hazardous waste limited to Waste Classes 111 to 114 inclusive, 121, 122, 123, 131 to 135 inclusive, 141 to 150 inclusive, 211, 212, 213, 221, 222, 231, 232, 233, 241, 242, 251 to 254 inclusive, 261 to 270 inclusive, 281 and 282 as described in the Ministry document "Ontario Waste Classes" dated April 20, 2016, as amended.

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

- (1) **“Approval”** and **“ECA”** means this entire provisional Environmental Compliance Approval document, issued in accordance with the EPA, and includes any schedules to it, the application and the supporting documentation listed in Schedule "A";
- (2) **“Director”** means any Ministry employee appointed in writing by the Minister pursuant to section 5 of the EPA as a Director for the purposes of Part V of the EPA;
- (3) **“District Manager”** means the District Manager of the local district office of the Ministry in which the Site is geographically located;

- (4) **"EPA"** and **"Act"** means the Environmental Protection Act, R.S.O. 1990, C.E-19, as amended;
- (5) **"Flammable"** means Flammable Liquid as defined in the "Guidelines for Environmental Protection Measures at Chemical and Waste Storage Facilities", May 2007 and as amended.
- (6) **"Ministry"** means the Ontario Ministry of the Environment, Conservation and Parks;
- (7) **"OWRA"** means the Ontario Water Resources Act, R.S.O. 1990, c. O.40, as amended;
- (8) **"Operator"** means any person, other than the Owner's employees, authorized by the Owner as having the charge, management or control of any aspect of the site;
- (9) **"Owner"** means any person that is responsible for the establishment or operation of the Site being approved by this ECA, and includes Oddo Grottoli Industrial Waste Renewal Inc. operating as Keith R. Thompson Inc., its successors and assigns;
- (10) **"PA"** means the Pesticides Act, R.S.O. 1990, c. P-11, as amended from time to time;
- (11) **"Provincial Officer"** means any person designated in writing by the Minister as a provincial officer pursuant to section 5 of the OWRA or section 5 of the EPA or section 17 of PA;
- (12) **"Reg. 347"** and **"regulation 347"** means Regulation 347, R.R.O. 1990, General - Waste Management, made under the EPA, as amended from time to time;
- (13) **"Regional Director"** means the Regional Director of the local Regional Office of the Ministry in which the Site is located;
- (14) **"Site"** means the entire 1.1 hectare waste disposal site located at 2765 Southview Drive, City of Greater Sudbury, District of Sudbury, specifically at Plan of Survey of Part of Lot 10, Concession 6, Township of Broder, District of Sudbury; and
- (15) **"Trained personnel"** means knowledgeable in the following through instruction and/or practice:
 - i. relevant waste management legislation, regulations and guidelines;
 - ii. major environmental concerns pertaining to the waste to be handled;
 - iii. occupational health and safety concerns pertaining to the processes and wastes to be handled;
 - iv. management procedures including the use and operation of equipment for the processes and wastes to be handled;
 - v. emergency response procedures;
 - vi. specific written procedures for the control of nuisance conditions;
 - vii. specific written procedures for refusal of unacceptable waste loads; and
 - viii. the requirements of this Approval.

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

conditions outlined below:

TERMS AND CONDITIONS

GENERAL

1. The Environmental Compliance Approval No. A540205, dated August 18, 2006 and subsequent notices issued on January 9, 2008, June 8, 2011, August 30, 2013 and August 10, 2015, is hereby revoked and replaced in its entirety by this Approval.

Compliance

2. The Owner and Operator shall ensure compliance with all the conditions of this Approval and shall ensure that any person authorized to carry out work on or operate any aspect of the Site is notified of this Approval and the conditions herein and shall take all reasonable measures to ensure any such person complies with the same.
3. Any person authorized to carry out work on or operate any aspect of the Site shall comply with the conditions of this Approval.

Build, etc. in Accordance

4. Except as otherwise provided by these conditions, the Site shall be designed, developed, used, maintained and operated, and all facilities, equipment and fixtures shall be built and installed, in accordance with the conditions of this Approval, the Design and Operations Report and all other supporting documents listed in Schedule "A" of this Approval.

Interpretation

5. Where there is a conflict between a provision of any document, including the application, referred to in this Approval, and the conditions of this Approval, the conditions in this Approval shall take precedence.
6. Where there is a conflict between the application and a provision in any documents listed in Schedule "A", the application shall take precedence, unless it is clear that the purpose of the document was to amend the application and that the Ministry approved the amendment.
7. Where there is a conflict between any two documents listed in Schedule "A", other than the application, the document bearing the most recent date shall take precedence.
8. The requirements of this Approval are severable. If any requirement of this Approval, or the application of any requirement of this Approval to any circumstance, is held invalid or unenforceable, the application of such requirement to other circumstances and the remainder of this Approval shall not be affected thereby.

Other Legal Obligations

9. The issuance of, and compliance with the conditions of, this Approval does not:
 - a. relieve any person of any obligation to comply with any provision of any applicable statute, regulation or other legal requirement; or
 - b. limit in any way the authority of the Ministry to require certain steps be taken or to require the Owner and Operator to furnish any further information related to compliance with this Approval.

Adverse Effects

10. The Owner and Operator shall take steps to minimize and ameliorate any adverse effect on the natural environment or impairment of water quality resulting from the Site, including such accelerated or additional monitoring as may be necessary to determine the nature and extent of the effect or impairment.
11. Despite an Owner, Operator or any other person fulfilling any obligations imposed by this Approval the person remains responsible for any contravention of any other condition of this Approval or any applicable statute, regulation, or other legal requirement resulting from any act or omission that caused the adverse effect to the natural environment or impairment of water quality.

Change of Owner

12. The Owner shall notify the Director in writing, and forward a copy of the notification to the District Manager, within 30 days of the occurrence of any changes:
 - a. the ownership of the Site;
 - b. the Operator of the Site;
 - c. the address of the Owner or Operator;
 - d. the partners, where the Owner is or at 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 Owner 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.
13. No portion of this Site shall be transferred or encumbered prior to or after closing of the Site

unless the Director is notified in advance and sufficient financial assurance is deposited with the Ministry to ensure that these conditions will be carried out. In the event of any change in Ownership of the Site, other than change to a successor municipality, the Owner shall notify the successor of and provide the successor with a copy of this Approval, and the Owner shall provide a copy of the notification to the District Manager and the Director.

Financial Assurance

14. Within 20 days of issuance of this Approval, the Owner shall provide the Ministry, Financial Assurance as defined in Section 131 of the EPA, in the amount of **\$18,000**. This Financial Assurance shall be in a form acceptable to the Director and shall provide sufficient funds for the analysis, transportation, Site clean-up, monitoring and disposal of all quantities of waste on the Site at any one time;
15. On March 31, 2025 and at intervals of four (4) years thereafter, the Company shall submit to the Director a re-evaluation of the amount of the Financial Assurance to implement the actions required under Condition 14. The re-evaluation shall include an assessment based on any new information relating to the environmental conditions of the Site and shall include the costs of additional monitoring and/or implementation of contingency plans required by the Director upon review of the closure plan and annual reports. The Financial Assurance shall be submitted to the Director within twenty (20) days of written acceptance of the re-evaluation by the Director;
16. As of March 31, 2022, the Owner shall prepare and maintain at the Site an updated re-evaluation of the amount of Financial Assurance required to implement the actions required under Condition 14 for each of the intervening years in which a re-evaluation is not required to be submitted to the Director under Condition 15. The re-evaluation shall be made available to the Ministry, upon request.
17. The amount of Financial Assurance is subject to review at any time by the Director and may be amended at his/her discretion. If any Financial Assurance is scheduled to expire or notice is received, indicating Financial Assurance will not be renewed, and satisfactory methods have not been made to replace the Financial Assurance at least sixty (60) days before the Financial Assurance terminates, the Financial Assurance shall forthwith be replaced by cash.

Inspections

18. No person shall hinder or obstruct a Provincial Officer in the performance of their duties, including any and all inspections authorized by the OWRA, the EPA or the PA of any place to which this Approval relates, and without limiting the foregoing to:
 - a. enter upon the premises where the Site are located, or the location where the records required by the conditions of this Approval are kept;
 - b. have access to, inspect, and copy any records required by the conditions of this Approval;

- c. inspect the practices, procedures, or operations required by the terms conditions of this Approval; and
- d. sample and monitor for the purposes of assessing compliance with the conditions of this Approval or the EPA, the OWRA or the PA.

Information and Record Retention

- 19. Any information requested, by the Ministry, concerning the Site 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 Ministry, upon request. Records shall be retained for five (5) years except for as otherwise authorized in writing by the Director.
- 20. The receipt of any information by the Ministry or the failure of the Ministry to prosecute any person or to require any person to take any action, under this Approval or under any statute, regulation or other legal requirement, in relation to the information, shall not be construed as:
 - a. an approval, waiver, or justification by the Ministry of any act or omission of any person that contravenes any term or condition of this Approval or any statute, regulation or other legal requirement; or
 - b. acceptance by the Ministry of the information's completeness or accuracy.

OPERATION and MAINTENANCE

- 21.
 - a. The Site shall be operated and maintained in accordance with the 2019 Design and Operations Report as amended, listed in schedule "A" as Item 34.
 - b. All wastes shall be managed and disposed of in accordance with Regulation 347.
 - c. At no time shall the discharge of a contaminant that causes or is likely to cause an adverse effect be permitted.
 - d. The Owner shall replace the filter bag in the fluorescent lamp crushing unit (Bulb Eater) at least twice per full drum (once at half fill and once after filling each drum), and replace the HEPA filter after filling every ten drums. The spent filters shall be contained in a separate labelled drum and characterized for proper disposal in accordance with Ontario Regulation 347.

CONSTRUCTION

- 22.
 - a. The Owner is approved to construct an indoor drum handling facility to be used for drum storage and the bulking and transfer of waste materials approved for receipt at the Site. The drum storage area shall be constructed as described within Items 21 and 23 contained within Schedule "A" of this Approval.

- b. Prior to any waste being stored within the indoor drum handling building the Owner shall provide to the District Manager a stamped report from a Professional Engineer confirming that the Owner has complied with all Building Code requirements and requirements pursuant to the Fire Protection and Prevention Act, 1997.
23. A set of as-built drawings, including a Site Plan, showing the Site as constructed shall be kept up to date through periodic revisions and shall be submitted to the Director and the District Manager. An amendment to this Approval shall be sought for changes requiring approval.

Service Area

24. Only waste that is generated within the Province of Ontario shall be accepted at the site..

Hours of Operation

25. a. The Owner shall only accept waste at the Site and ship wastes from the Site between the hours of 8:00 a.m. and 6:00 p.m., Monday to Friday.
- b. Notwithstanding Condition 25.a, waste generated from emergency spill response may be received at the Site twenty four (24) hours per day, seven (7) days per week.

Site Security and Signage

26. The Site shall be operated and maintained in a secure manner, such that unauthorized persons cannot enter the Site.
27. A sign shall be posted and maintained at the main entrance/exit to the site displaying in a manner that is clear and legible at a distance of twenty-five metres from the public roadway bordering the Site. The sign shall contain the following information:
- a. the name of the Site and Owner;
 - b. the number of this Approval;
 - c. the normal hours of operation;
 - d. a telephone number to which complaints may be directed;
 - e. a twenty-four (24) hour emergency telephone number (if different from above); and
 - f. a warning against dumping outside the Site.

Vermin, etc.

28. The Site shall be operated and maintained such that vermin, vectors, dust, litter, odour, noise and traffic do not create a nuisance.

Waste Type

29. The Site may only accept non-hazardous solid industrial waste, liquid industrial waste and hazardous waste limited to Waste Classes 111 to 114 inclusive, 121, 122, 123, 131 to 135 inclusive, 141 to 150 inclusive, 211, 212, 213, 221, 222, 231, 232, 233, 241, 242, 251 to 254 inclusive, 261 to 270 inclusive, 281 and 282 as described in the Ministry document "New Ontario Waste Classes" dated January 1986 or as amended.

Waste Limits

30. The total maximum amount of wastes received and/or processed at the Site are limited in the following manner:
- a. No more than 48,000 litres of liquid industrial waste, hazardous industrial waste or solid non-hazardous waste except fluorescent lamps and plastic containers per day shall be accepted at the Site.
 - b. No more than 6 tonnes of fluorescent lamps per year shall be crushed.
 - c. No more than 36 tonnes of plastic containers per year shall be shredded.
31. No more than 14,400 litres of waste, or equivalent, shall be stored or be present on site at any time. For the purposes of assessing compliance with this Approval, a general conversion factor for solids to liquids shall be one (1) tonne = 1,000 kilograms = 1,000 litres and will not incorporate the specific gravity of the waste. If for any reason waste cannot be transferred from the site, the site must cease accepting more waste and shall ensure the total amount of waste on Site does not exceed the maximum quantity approved under Condition 32.
32. The total maximum amount of waste stored at the Site referred to in Condition 31 is limited in the following manner:
- a. A maximum of 13,400 litres of liquid industrial waste or hazardous industrial waste or solid non-hazardous waste contained in 205 litre drums or totes or other suitable containers and stored within the organic / inorganic warehouses as per schedule "B".
 - b. A maximum of 1,000 litres of liquid industrial waste or hazardous industrial waste including all flammable organic wastes contained in 205 litre metal drums and double contained in plastic overpacks and stored within a metal sea-can as per schedule "B".
33. The total amount of waste leaving the Site for final disposal, comprised of waste from the transfer operation and residual waste arising from the processing operations, shall not exceed 1,000 tonnes or equivalent per day.

34. Waste shall not be stored at any other location other than that which is described in the supporting documents contained in Schedule "A" of this Approval.

Labelling

35. All waste storage containers at the Site shall have a label or sign identifying the waste class(es), waste characteristic, and, when applicable, the WHMIS and TDGA classification of the contents contained within. The label or sign shall be clearly visible for inspection and record keeping.
36. The Owner shall keep a container inventory for all materials stored at the Site to be made available to any Provincial Officer upon request.

Segregation and Containment

37. a. The Owner shall ensure that all waste shall be stored in accordance with Ministry publication "Guidelines of Environmental Protection Measures at Chemical and Waste Storage Facilities", dated May 2007 or amended. Wastes shall be segregated from other incompatible wastes and materials.
- b. Organic flammables shall only be stored in and an exterior sea-can in a separate containment cell.
38. The Owner shall keep on site a stamped report from a Professional Engineer assessing the existing secondary containment provisions for bulk storage areas at the Site. The report shall include a detailed assessment of the integrity of the earthen berms and shall include any recommendations for improvements that may be necessary to restore containment integrity. The report shall also include details of an inspection and preventative maintenance program to ensure that the integrity of the containment berms is maintained at all times.
39. The Owner shall inspect and maintain the spill containment system in accordance with the Professional Engineers report referred to in Condition 38 to ensure that the integrity of the system is maintained at all times.
40. In the event of any loss of containment integrity, the Owner shall immediately take all necessary remedial action to restore containment integrity.

Incoming / Outgoing Waste

41. All in-coming and outgoing wastes shall be inspected and tested by qualified personnel as described in the documentation contained within Schedule "A" of this Approval, prior to being received, processed, transferred and shipped to ensure wastes are being managed and disposed of in accordance with the EPA and Reg. 347.
42. Notwithstanding the requirements of Condition 41 of this Approval, all reasonable measures in the way of laboratory, compatibility and bench testing of waste and materials shall be taken to

ensure that the bulking, blending, mixing, transfer and processing of wastes at the Site will not result in uncontrollable reactions that could result in a fire or release of contaminants to the natural environment.

43. The Owner shall ensure that no waste or materials containing polychlorinated biphenyls in excess of 50 ppm by weight is received at this Site.

Processing

44. a. Processing carried out at the Site is limited to the following operations as described in Items 29 and 31 of Schedule "A", which form part of this Approval: bulking of wastes of the same waste class, mechanical crushing of automotive oil filters, sorting of lab packs, crushing of fluorescent lamps, and shredding of plastic containers.
- b. The Site is approved for carrying out the blending operation of specific waste streams in a 1,200 litre tote in the organic warehouse to produce non-halogenated rich organics (waste class 281), in accordance with the amended Section E-2 of the Design and Operations Report listed in Schedule "A" as Item 31.
45. The blending and mixing of liquid industrial waste and hazardous waste that is not of the same waste class, as defined in the Ministry document "New Ontario Waste Classes" dated January 1986 and as amended shall not be permitted at any time at this site except for the processes referred to in condition 44 a. and 44 b.

Management of Listed Wastes

47. a. The Owner must ensure that all of the wastes generated at the Site are disposed in accordance with Reg. 347;
- b. Hazardous Industrial Waste (Schedule 1, Reg. 347), Acute Hazardous Waste Chemical (Schedule 2(A), Reg. 347), Hazardous Waste Chemical (Schedule 2(B), Reg. 347) and Severely Toxic Waste (Schedule 3, Reg. 347) may not be mixed, bulked, blended, put into a common container, or processed with any other waste material at the Site unless the procedures specified in this Condition are followed;
- i. Only chemically compatible wastes may be mixed bulked or blended;
 - ii. A mixture of a Severely Toxic Waste and any other waste(s) is a Severely Toxic Waste;
 - iii. A mixture of an Acute Hazardous Waste Chemical and any other waste(s) except a Severely Toxic Waste is an Acute Hazardous Waste Chemical;
 - iv. A mixture of a Hazardous Waste Chemical and any other waste(s) except as Severely Toxic Waste or an Acute Hazardous Waste Chemical is a Hazardous Waste Chemical; and
 - v. A mixture of a Hazardous Industrial Waste and any other waste(s) except a Severely Toxic Waste, an Acute Hazardous Waste Chemical or a Hazardous Waste Chemical is a Hazardous Industrial Waste;

- c. The Owner shall maintain for a period of five years, a record available for inspection, tracking the path of waste movement through the Site for Acute Hazardous Waste Chemical, Hazardous Waste Chemical, Hazardous Industrial Waste and Severely Toxic Waste, including as a minimum;
 - i. Date of receipt of the waste, including manifest number;
 - ii. Waste class and waste characteristic;
 - iii. Volume or mass of waste received;
 - iv. Date and location of disposal of the Hazardous Waste, including the manifest number; and
- d. The listed Subject Wastes and the responding waste characterization referred to in Condition 47.b. of this Approval, may not be changed by the Owner once received at the Site with the exception of wastes received in "Lab Pack" form and the contents of the smaller containers are bulked into larger containers of similar waste characteristics for the sole purposes of transporting waste for final disposal. All other bulking, transferring and processing activities are not permitted to de-list waste with the H, A, B, or S hazardous waste characterization suffix.

Waste Inspection

- 48. All waste shall be inspected by Trained personnel prior to being accepted at the Site to ensure that the waste is of a type approved for acceptance under this Approval.
- 49. In the event that load of waste is refused, a record shall be made in the daily log book identifying the reason the waste was refused and the origin of the waste, if known.

Site Inspection

- 50. An inspection of the entire Site and all equipment on the Site shall be conducted each day the Site is in operation to ensure that: the Site is secure; that the operation of the Site is not causing any nuisances; that the operation of the Site is not causing any adverse effects on the environment and that the Site is being operated in compliance with this Approval. Any deficiencies discovered as a result of the inspection shall be remedied immediately, including temporarily ceasing operations at the Site if needed.
- 52. A record of the inspections shall be kept in the daily log book that includes the following information:
 - a. the name and signature of person that conducted the inspection;
 - b. the date and time of the inspection;
 - c. a list of any deficiencies discovered;

- d. any recommendations for remedial action; and
- e. the date, time and description of actions taken.

GROUNDWATER MONITORING

53. The Owner shall keep the Groundwater Monitoring Program and Contingency Plan up to date. The Groundwater Monitoring Program shall identify how groundwater will be monitored at the Site. The Contingency Plan shall address the measures that will be put in place in the event that off site impacts occur. The Groundwater Monitoring Program and Contingency Plan shall be prepared by a Professional Engineer or Professional Geoscientist.

Other approvals

54. The Owner shall ensure that Site processes and equipment are not operated unless all air approvals under Section 9 of the EPA, where applicable, have been obtained.
55. At no time is burning or incineration of any materials allowed on the Site.

Training Plan

56. A training plan shall be developed and maintained for all employees that operate the Site. Only Trained personnel may operate the Site or carry out any activity required under this Approval.
57. The Owner shall ensure that Trained personnel as per Condition 56 are available at all times during the hours of operation of this Site. Trained personnel shall supervise all transfer or processing of waste material at the Site.

Complaint Response

58. If at any time, the Owner receives complaints regarding the operation of the Site, the Owner shall respond to these complaints according to the following procedure:
- a. Record and number each complaint, either electronically or in a separate log book, and shall include the following information:
 - i. the nature of the complaint,
 - ii. if complaint is odour or nuisance related, the weather conditions and wind direction at the time of the complaint;
 - iii. the name, address and the telephone number of the complainant (if provided); and
 - iv. the time and date of the complaint;
 - b. The Owner, upon notification of the complaint, shall initiate appropriate steps to determine all possible causes of the complaint, proceed to take the necessary actions to eliminate the cause of the complaint and forward a formal reply to the complainant; and

- c. The Owner shall complete and retain on-site a report written within one (1) week of the complaint date, listing the actions taken to resolve the complaint and any recommendations for remedial measures, and managerial or operational changes to reasonably avoid the recurrence of similar incidents.

Emergency Response Plan

- 59. The Emergency Response Plan shall be kept up to date, and a copy shall be retained in a central location on the Site and shall be accessible to all staff at all times. Changes to the Emergency Response Plan shall be submitted to the District Manager with a copy to the local Municipality and the Fire Department. At a minimum the Emergency Response Plan shall include the following:
 - a. emergency response procedures to be undertaken in the event of a spill or process upset, including specific clean up methods for each different type of waste the Site is approved to accept;
 - b. a list of equipment and spill clean up materials available in case of an emergency; and
 - c. notification protocol with names and telephone numbers of persons to be contacted, including persons responsible for the site, the Ministry's District Office and Spills Action Centre, the local Fire Department, the local Municipality, the local Medical Officer of Health, and the Ministry of Labour, and the names and telephone numbers of waste management companies available for emergency response.
- 60. The equipment, materials and personnel requirements outlined in the Emergency Response Plan shall be immediately available on the Site at all times. The equipment shall be kept in a good state of repair and in a fully operational condition.
- 61. All staff that operate the site shall be fully trained in the use of the Emergency Response Plan and in the procedures to be employed in the event of an emergency.
- 62. The Owner shall immediately take all measures necessary to contain and clean up any spill or leak which may result from the operation of this Site and immediately implement the Emergency Response Plan if required.

Design and Operations Report

- 63. The Design and Operations Report shall be retained at the Site; kept up to date; and be available for inspection by Ministry staff. The Design and Operations Report shall contain at a minimum the information specified for a waste processing site as described in the most recent version of the Ministry publication "Guide For Applying For Approval of Waste Disposal Site".
- 64. Changes to the Design and Operations Report shall be submitted to the Director for approval.

Daily Log Book

65. The Owner shall maintain, at the Site for a minimum of five years, a log book(s) or electronic file format which records daily the following information:
- a. date;
 - b. types (waste class and primary characteristic), quantities and source of waste received;
 - c. quantity and type (waste class and primary characteristic) of all unprocessed, processed and residual waste on the Site;
 - d. types (waste class and primary characteristic), quantities and destination of each type of waste shipped from the Site;
 - e. a record of daily inspections required by this Approval;
 - f. a record of any spills or process upsets at the site, the nature of the spill or process upset and the action taken for the clean up or correction of the spill, the time and date of the spill or process upset, and for spills, the time that the Ministry and other persons were notified of the spill in fulfilment of the reporting requirements in the EPA;
 - g. a record of any waste refusals which shall include; amounts, reasons for refusal and actions taken; and
 - h. the signature of the Trained Personnel conducting the inspection and completing the report.

Annual Report

66. On or before March 31st of each year, the Owner shall prepare a written report for the previous calendar year ("Annual Report") The Annual Report shall be submitted to the District Manager on March 31 of each year. The report shall include, at a minimum, the following information:
- a. a detailed monthly summary of all wastes received at the Site, including specific waste classes, waste descriptions and amounts.;
 - b. a detailed monthly summary of all materials shipped from the Site for disposal or recycling including specific waste classes, material descriptions, amounts and destinations;
 - c. any environmental and operational problems, that could negatively impact the environment, encountered during the operation of the Site and during the facility inspections and any mitigative actions taken;

- d. any changes to the Emergency Response Plan, the Design and Operations Report and the Closure Plan that have been approved by the Director since the last Annual Report; and
- e. any recommendations to minimize environmental impacts from the operation of the Site and to improve Site operations and monitoring programs in this regard.

Closure Plan

- 67. Six (6) months prior to the planned closure of this Site, the Owner shall provide to the Director, for written approval, a written Closure Plan for the Site. This plan must include, as a minimum, a description of the work that will be done to facilitate closure of the Site and a schedule for completion of that work;
- 68. The Owner shall implement the Closure Plan, after it has been approved, in writing, by the Director; and
- 69. Within 10 days after closure of the Site, the Owner shall notify the Director, in writing, that the Site is closed and that the approved Closure Plan has been implemented.

SCHEDULE "A"

This Schedule "A" forms part of the this Environmental Compliance Approval:

1. Letter dated January 16, 1995 from J.C. Nicholls, Sprier Associates, to R. Paolin, Ministry of the Environment.
2. Letter dated January 23, 1995 from Sprier Associates, to R. Paolin, Ministry of the Environment, including supporting documentation.
3. Letter dated March 29, 1995 from B.A. Fransen, Regional Municipality of Sudbury, to Keith Thompson.
4. Letter dated May 12, 1995 from Don Hayes, Ministry of the Environment, to K.R. Thompson.
5. Letter dated June 12, 1995 from J.C. Nicholls, Sprier Associates, to D. Hayes, Ministry of the Environment.
6. Letter dated July 31, 1995, from J.C. Nicholls, Sprier Associates, to D. Hayes, Ministry of the Environment, including supplemental support documentation.
7. Application for a Waste Disposal Site (re-submission), submitted and signed by Keith Thompson, dated July 31, 1995.
8. Letter dated August 14, 1995 from J.C. Nicholls, Sprier Associates, to D. Hayes, Ministry of the Environment.
9. Letter dated September 25, 1995 from Ian Parrott, Ministry of the Environment, to Keith Thompson.
10. Application for a Waste Disposal Site, submitted and signed by K.R. Thompson, dated August 22, 1997.
11. Bound Supplemental Support Documentation, dated October 17, 1997, prepared by Sprier Associates.
12. Letter dated November 24, 1997, from J.C. Nicholls, Sprier Associates, to Marc E. Chalifoux, Ministry of the Environment.
13. Letter dated January 7, 1998, from J.C. Nicholls, Sprier Associates, to David Bell, Ministry of the Environment, including Site Plans marked as Diagrams 1, 2, and 3.
14. Letter dated January 26, 1998, from J.C. Nicholls, Sprier Associates, to J. David Bell, Ministry of the Environment.

15. Letter dated January 29, 1998, from J.C. Nicholls, Spriet Associates, to J. David Bell, Ministry of the Environment.
16. Letter dated February 2, 1998, from J.C. Nicholls, Spriet Associates, to J. David Bell, Ministry of the Environment.
17. Application for a Provisional Certificate of Approval for a Waste Disposal Site, submitted by Keith R. Thompson Inc. and signed by Dan Grottoli, dated February 28, 2005.
18. Letter dated March 18, 2005, from Dan Grottoli, Keith R. Thompson Inc., to Gabriela Sadowska, Ministry of the Environment, providing additional supporting documentation.
19. Letter dated May 18, 2005, from Tim Edwards, Ministry of the Environment, to Dan Grottoli, Keith R. Thompson Inc., requesting additional information.
20. Facsimile dated June 10, 2005 from Dan Grottoli, Keith R. Thompson Inc., to Brad Ross, Ministry of the Environment, including the Articles of Incorporation for 1627527 Ontario Inc.
21. Report Entitled "Amendment to Provisional Certificate of Approval A540205", dated February 2006 and prepared by S.A. Kirchhefer Limited, including revised Design and Operations Report and supporting documentation.
22. Letter dated April 11, 2006, from Tim Edwards, Ministry of the Environment, to Dan Grottoli, Keith R. Thompson Inc., requesting additional information.
23. Letter dated May 19, 2006, from Dan Grottoli, Keith R. Thompson Inc., to Tim Edwards, Ministry of the Environment, providing additional supporting documentation.
24. Application for a Provisional Certificate of Approval for a Waste Disposal Site dated April 19, 2007 and signed by Dan Grottoli.
25. Design & Operations Report dated May 29, 2007.
26. Letter dated August 2, 2007 from Dan Grottoli to Josephine DeSouza of MOE along with revised page 26 from the Design & Operations Report.
27. Email dated October 1, 2007 from Dan Grottoli to Jatinbhai Patel of MOE regarding changes to "E-6 Water Treatment".
28. Email dated December 15, 2010 from Dan Grottoli, Oddo Grottoli Industrial Waste Renewal Inc., to Bonnie Wilkinson, Ministry of the Environment, providing supporting information on Design and Operations Report, site plan and financial assurance.
29. 2010 Design and Operations Report for Oddo Grottoli Industrial Waste Removal Inc. dated November 23, 2010.

30. Email dated April 15, 2011 from Dan Grottoli, Oddo Grottoli Industrial Waste Renewal Inc., to Christina Ng, Ministry of the Environment, providing supporting information on financial assurance.
31. Email dated May 5, 2011 from Dan Grottoli, Oddo Grottoli Industrial Waste Renewal Inc., to Christina Ng, Ministry of the Environment, regarding amendments to the 2010 Design and Operations Report dated November 23, 2010 (Item 29 above) and supporting information on financial assurance (Item 30 above).
32. 2010 Design and Operations Report for Oddo Grottoli Industrial Waste Renewal Inc., revised on August 7, 2013.
33. Letter dated November 26, 2014 and signed by Dan Grottoli Sr., with the re-evaluation of the Financial Assurance.
34. 2019 Design and Operations Report for Oddo Grottoli Industrial Waste Removal Inc. dated November 6, 2020.
35. Financial assurance estimates dated November 16 2020, from Dan Grottoli, Oddo Grottoli Industrial Waste Removal Inc.

Schedule "B"

This Schedule "B" forms part of this Environmental Compliance Approval:

Maximum Amount of Waste Storage

Location	Waste Classes	Quantity of Waste
Organic -inorganic warehouse	Acids (class 111-114)	1,000 L (5 drums)
	Alkaline solutions & Aqueous salts (class 121 – 123 & 131 – 135)	1,000 L (5 drums)
	Miscellaneous inorganic waste (class 141 – 150)	1,000 L (5 drums)
	Various batteries (class 111-114, 121-123)	7,200 L (36 drums)
	All organic waste classes except flammables	3,200 L (16 drums)
35 ft. sea-can	flammables	1,000 L (5 drums)
Total Waste		14,400 Liters

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

1. The reason for definitions is to simplify the wording of the subsequent conditions and define the specific meaning of terms as used in this Environmental Compliance Approval.
2. The reason for Condition 1 is to state that previously issued Environmental Compliance Approval for the Site are revoked and replaced with this Approval.
3. The reason for Conditions 2, 3, 5, 6, 7, 8, 9, 10, 11, 19 and 20 is to clarify the legal rights and responsibilities of the Owner and Operator.
4. The reason for Conditions 4, 22, 44, 64 and 65 is to ensure that the Site is operated in accordance with the application and supporting documentation submitted by the Company, and not in a manner which the Director has not been asked to consider.
5. The reasons for Condition 12 is to ensure that the Site is operated under the corporate name which appears on the application form submitted for this approval and to ensure that the Director is informed of any changes.
6. The reasons for Condition 13 are to restrict potential transfer or encumbrance of the Site without the approval of the Director and to ensure that any transfer of encumbrance can be made only on the basis that it will not endanger compliance with this Approval.
7. The reason for Conditions 14, 15, 16 and 17 is to ensure that sufficient funds are available to the Ministry to clean up the Site in the event that the Company is unable or unwilling to do so.
8. The reason for Condition 18 is to ensure that appropriate Ministry staff have ready access to the Site for inspection of facilities, equipment, practices and operations required by the conditions in this Approval. This condition is supplementary to the powers of entry afforded a Provincial Officer pursuant to the EPA and OWRA.
9. The reason for Conditions 21, 28, 34, 38, 39, 40, 46, 53, 54, 55 and 56 is to ensure that the Site is operated in a manner which does not result in a nuisance or a hazard to the health and safety of the environment or people.
10. The reason for Condition 23 is to ensure the availability of record drawings for inspection and information purposes.
11. The reasons for Conditions 24, 29, 30, 31, 32 and 33 are to specify the approved service area from which waste may be accepted at the Site, the types of waste that may be accepted at the Site, the amounts of waste that may be stored at the Site and the maximum rate at which the Site may receive waste and ship waste from the Site.
12. The reasons for Condition 25 is to specify the hours of operation for the Site.

13. The reasons for Condition 26 is to ensure the controlled access and integrity of the Site by preventing unauthorized access when the Site is closed and no site attendant is on duty.
14. The reason for Condition 27 is to ensure that users of the Site are fully aware of important information and restrictions related to Site operations and access under this Approval.
15. The reason for Conditions 35, 36, 41, 42, 43, 47 and 48 is to ensure that all wastes are properly classified to ensure that they are managed, processed and disposed in accordance with O. Reg. 347, R.R.O. 1990 and in a manner that protects the health and safety of people and the public.
16. The reason for Conditions 49, 50, 51 and 52 is to ensure that detailed records of Site inspections are recorded and maintained for inspection and information purposes.
17. The reason for Conditions 56 and 57 is to ensure that the Site is operated by properly Trained staff in a manner which does not result in a hazard or nuisance to the natural environment or any person.
18. The reason for Condition 58 is to ensure that any complaints regarding Site operations at the Site are responded to in a timely manner.
19. The reasons for Conditions 59, 60, 61 and 62 is to ensure that an Emergency Response Plan is developed and maintained at the Site and that staff are properly trained in the operation of the equipment used at the Site and emergency response procedures.
20. The reasons for Condition 63 is to provide for the proper assessment of effectiveness and efficiency of site design and operation, their effect or relationship to any nuisance or environmental impacts, and the occurrence of any public complaints or concerns. Record keeping is necessary to determine compliance with this Approval, the EPA and its regulations.
21. The reasons for Condition 66 are to ensure that regular review of site development, operations and monitoring data is documented and any possible improvements to site design, operations or monitoring programs are identified. An annual report is an important tool used in reviewing site activities and for determining the effectiveness of site design.
22. The reasons for Conditions 67, 68 and 69 is to ensure that the Site is closed in accordance with Ministry standards and to protect the health and safety of the public and the environment.

Upon issuance of the environmental compliance approval, I hereby revoke Approval No(s). A540205 issued on August 18, 2006, as amended.

In accordance with Section 139 of the Environmental Protection Act, you may by written Notice served upon me, the Environmental Review 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 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:

The Secretary*
Environmental Review Tribunal
655 Bay Street, Suite 1500
Toronto, Ontario
M5G 1E5

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 Environmental Review Tribunal's requirements for an appeal can be obtained directly from the Tribunal at: Tel: (416) 212-6349, Fax: (416) 326-5370 or www.ert.gov.on.ca**

This instrument is subject to Section 38 of the Environmental Bill of Rights, 1993, that allows residents of Ontario to seek leave to appeal the decision on this instrument. Residents of Ontario may seek leave to appeal within 15 days from the date this decision is placed on the Environmental Registry. By accessing the Environmental Registry at <https://ero.ontario.ca/>, you can determine when the leave to appeal period ends.

The above noted activity is approved under s.20.3 of Part II.1 of the Environmental Protection Act.

DATED AT TORONTO this 5th day of December, 2020



Mohsen Keyvani, P.Eng.

Director

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

AT/

c: District Manager, MECP Sudbury
Dan Grottoli, Keith R Thompson Inc. (KRT)