



**Ministry of the Environment, Conservation and Parks**  
**Ministère de l'Environnement,**  
**de la Protection de la nature et des Parcs**

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**ENVIRONMENTAL COMPLIANCE APPROVAL**

NUMBER A-500-1827782271

Version: 1.0

Issue Date: March 4, 2025

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

UMICORE PRECIOUS METALS CANADA INC.

451 DENISON STREET  
MARKHAM ONTARIO  
L3R1B7

For the following site:

951 Denison street, Unit 8, Markham, Ontario.

Upon issuance of the environmental compliance approval, I hereby revoke Approval No(s) 7150-8WPRGF, issued on September 12, 2012.

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 precious metals recovery facility, consisting of the following processes and support units:

- a natural gas fired recovery furnace, having a total maximum heat input of 2,706,075 kilojoules per hour, equipped with a primary combustion chamber; a secondary combustion chamber, operating at a minimum of 1000 degrees Celsius; APC Equipment, a CEM System;  
- crushing;  
- sieving;  
- blending, sampling and storage;  
including the Equipment and any other ancillary and support processes and activities, operating at a Facility Production Limit of up to 250 kilograms of sweeps per day exhausting to the atmosphere as described in the ESDM Report.

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## **DEFINITIONS**

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. "APC Equipment" means the air pollution control equipment associated with the Recovery Furnace, including the vertical spray quench tower, packed-bed absorber with recirculating water or caustic solution, mist eliminator, dust collector, and carbon adsorption tower, all operated in series, as described in the Company's application, this Approval and Supporting Documentation referred to herein, to the extent approved by this Approval;
4. "Approval" means this entire Environmental Compliance Approval and any Schedules to it;
5. "CEM System" means the continuous monitoring and recording systems, associated with the Recovery Furnace, as described in the Company's application, this Approval and in the supporting documentation referred to herein, to the extent approved by this Approval;
6. "Company" means Umicore Precious Metals Inc. 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;
7. "Compound of Concern" means a contaminant that is 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;
8. "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;
9. "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;
10. "District Manager" means the District Manager of the appropriate local district office of the Ministry, where the Facility is geographically located;

11. "Emission Summary Table" means a table described in paragraph 14 of subsection 26 (1) of O. Reg. 419/05;
12. "Environmental Assessment Act" means the *Environmental Assessment Act*, R.S.O. 1990, c.E.18;
13. "EPA" means the *Environmental Protection Act*, R.S.O. 1990, c.E.19;
14. "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;
15. "Equipment with Specific Operational Limits" means the Recovery Furnace, 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;
16. "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;
17. "Facility" means the entire operation located on the property where the Equipment is located;
18. "Facility Production Limit" means the production limit placed by the Director on the main product(s) or raw materials used by the Facility;
19. "Highest Ranking Person" means the highest ranking person regularly present at the Facility who has management responsibilities relating to the Facility;
20. "Log" means a document that contains a record of each change that is required to be made to the ESDM 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;
21. "Manager" means the Manager, Technology Standards Section, Standards Development Branch, or any other person who represents and carries out the duties of the Manager, Technology Standards Section, Standards Development Branch, as those duties relate to the conditions of this Approval;
22. "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*;
23. "Ministry" means the ministry of the Minister;

24. "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;

25. "Noise Screening Documents" means the completed Primary Noise Screening Method, or the completed Secondary Noise Screening Method, with supporting information and documentation, as updated in accordance with Condition 5 of this Approval;

26. "O. Reg. 419/05" means Ontario Regulation 419/05: Air Pollution – Local Air Quality, made under the EPA;

27. "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 WSP Canada Inc., dated March 20, 2024, submitted in support of the application, and includes any changes to the report made up to the date of issuance of this Approval;

28. "Point of Impingement" has the same meaning as in section 2 of O. Reg. 419/05;

29. "Primary Noise Screening Method" means the Ministry Primary Noise Screening Method form as described in the "Primary Noise Screening Method Guide", January 31, 2017, as amended;

30. "Procedure Document" means Ministry guidance document titled "Procedure for Preparing an Emission Summary and Dispersion Modelling Report" dated March 2018, as amended;

31. "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;

32. "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;

33. "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;

34. "Recovery Furnace" means the natural gas fired recovery furnace used for the processing of Sweeps, identified as FURN-1, equipped with a primary combustion chamber; a secondary combustion chamber; APC Equipment and CEM System; as described in the Company's application, this Approval and in the supporting documentation referred to herein, to the extent approved by this Approval;

35. "Report EC32102" means the document titled "Protocols and performance specifications

for continuous monitoring of gaseous emissions from thermal power generation and other sources" published by Environment and Climate Change Canada in 2023, as amended;

36. "Schedules" means the following schedules attached to this Approval and forming part of this Approval namely:

- Schedule 1 - Supporting Documentation;
- Schedule 2 - Test Contaminants;
- Schedule 3 - Source Testing Procedures;
- Schedule 4 - In-Stack Emission Limits; and
- Schedule 5 - Continuous Monitoring Systems.

37. "Secondary Noise Screening Method" means the Ministry Secondary Noise Screening Method form as described in the "Secondary Noise Screening Method Guide", January 31, 2017, as amended;

38. "Source Testing Code" means the Source Testing Code, Version 2, Report No. ARB-66-80, dated November 1980, prepared by the Ministry, as amended;

39. "Source Testing" means sampling and testing to measure emissions resulting from operating the Equipment at a level of typical maximum production within the approved operating range of the Equipment which satisfies paragraph 1 of subsection 11(1) of O. Reg. 419;

40. "Sweeps" means materials containing low levels of precious metals and organic/combustible materials, received from other facilities off site to be processed at the Facility;

41. "Test Contaminants" means the contaminants listed in Schedule 2;

42. "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

43. "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.

## **TERMS AND CONDITIONS**

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

## **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 1 - Supporting Documentation
  - Schedule 2 - Test Contaminants;
  - Schedule 3 - Source Testing Procedures;
  - Schedule 4 - In-Stack Emission Limits; and
  - Schedule 5 - Continuous Monitoring Systems.

## **2. LIMITED OPERATIONAL FLEXIBILITY**

1. Pursuant to section 20.6 (1) of the EPA and subject to Conditions 2.2 and 2.3 of this Approval, future construction, alterations, extensions or replacements are approved in this Approval if the future construction, alterations, extensions or replacements are Modifications to the Facility that:
  - 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; or
  - 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 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, at all times, ensure 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 not conduct any activities or operation or any Equipment between the hours of 11 pm and 7 am (i.e., night time hours as defined in Publication NPC-300).
6. The Company shall operate any Equipment with Specific Operational Limits approved by this Approval in accordance with the Original ESDM Report and Condition No. 10 in this Approval.

#### **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 ESDM Report in accordance with section 26 of O. Reg. 419/05 and shall update the Noise Screening Documents 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 the Noise Screening Documents 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 Noise Screening Documents 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**

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, including the Recovery Furnace, which shall specify as a minimum:

1. a. frequency of inspections and scheduled preventative maintenance;  
b. procedures to prevent upset conditions;  
c. procedures to minimize all fugitive emissions;  
d. procedures to prevent and/or minimize odorous emissions;  
e. procedures to prevent and/or minimize noise emissions; and  
f. procedures for record keeping activities relating to the operation and maintenance programs.
2. The Company shall ensure that all Processes with Significant Environmental Aspects, including the Recovery Furnace, are operated and maintained in accordance with

this Approval, the operating procedures and maintenance programs.

## **8. COMPLAINTS RECORDING AND REPORTING**

1. If at any time, the Company receives an environmental complaint from the public regarding the operation of the Equipment approved by this Approval, the Company shall take the following steps:
  - a. Record and number each complaint, either electronically or in a log book. The record shall include the following information: the time and date of the complaint and incident to which the complaint relates, the nature of the complaint, wind direction at the time and date of the incident to which the complaint relates and, if known, the address of the complainant.
  - b. Notify the District Manager of the complaint within two (2) business days after the complaint is received, or in a manner acceptable to the District Manager.
  - c. Initiate appropriate steps to determine all possible causes of the complaint, and take the necessary actions to appropriately deal with the cause of the subject matter of the complaint.
  - d. Complete and retain on-site a report written within five (5) business days of the complaint date. The report shall list the actions taken to appropriately deal with the cause of the complaint and set out steps to be taken to avoid the recurrence of similar incidents.

## **9. RECORD KEEPING REQUIREMENTS**

1. Any information requested by any employee in or agent of the Ministry concerning the Facility and its operation under this Approval, including, but not limited to, any records required to be kept by this Approval, shall be provided to the employee in or agent of the Ministry, upon request, in a timely manner.
2. Unless otherwise specified in this Approval, the Company shall retain, for a minimum of five (5) years from the date of their creation all reports, records and information described in this Approval, including,
  - a. a copy of the Original ESDM Report and each updated version;
  - b. supporting information used in the emission rate calculations performed in the ESDM Reports;
  - c. the records in the Log;
  - d. copies of each Written Summary Form prepared under Condition 6.1 of this Approval;
  - e. records of maintenance, repair and inspection of Equipment related to all Processes with Significant Environmental Aspects; and

- f. all records related to environmental complaints made by the public as required by Condition 8 of this Approval.
- g. the records related to the operation, maintenance and calibration of the CEM System; and
- h. the Source Testing reports prepared in accordance with Condition 10 of this Approval.

## **10. EQUIPMENT WITH OPERATIONAL LIMITS - RECOVERY FURNACE.**

1. The Company shall ensure that no substances containing chlorinated and/or fluorinated compounds, including polyvinyl chloride and Teflon are combusted in the Recovery Furnace.

### **2. PERFORMANCE REQUIREMENTS**

The Company shall ensure that the Recovery Furnace, complete with the APC Equipment, is designed and operated to comply, at all times, with the following performance requirements:

- a. The operating temperature of the secondary combustion chamber of the Recovery Furnace, as recorded by the CEM System, shall not be less than 1,000 degrees Celsius at a residence time of not less than one (1) second, before the primary combustion chamber is loaded and thereafter throughout the operation of the Recovery Furnace;
- b. The emissions from the Recovery Furnace after those emissions have been controlled by the APC Equipment for discharge into the atmosphere shall comply with the in-stack emission limits listed in Schedule 4, as measured by the Source Testing;
- c. The concentration of oxygen, as recorded by the CEM System in the undiluted flue gas leaving the secondary combustion chamber of the Recovery Furnace, shall not be less than 6 percent by dry volume;
- d. The concentration of carbon monoxide, as recorded by the CEM System in the undiluted flue gas leaving the secondary combustion chamber of the Recovery Furnace, shall not exceed 35 parts per million by dry volume calculated as the rolling arithmetic average of 4 hours of data.

### **3. SOURCE TESTING**

The Company shall perform Source Testing, not later than October 18, 2026, in accordance with the procedures in Schedule 3, to determine the emission rates of the Test Contaminants from the Recovery Furnace. The Company shall repeat the

Source Testing every four (4) years thereafter.

#### **4. CONTINUOUS MONITORING**

The Company shall, prior to the commencement of operation of the Recovery Furnace, install and subsequently maintain a CEM System to continuously monitor:

- a. the concentrations of carbon monoxide, and oxygen in the undiluted flue gas exiting the secondary combustion chamber of the Recovery Furnace; and
- b. the temperature at the location in the secondary combustion chamber of the Recovery Furnace, where the minimum retention time of the combustion gases at a minimum temperature of 1,000 degrees Celsius for at least 1 second is achieved.
- c. The CEM System shall be equipped with continuous recording devices and shall comply with the requirements outlined in the attached Schedule 5.

#### **11. 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 the Facility operations:
  1. the ownership of the Facility;
  2. the operator of the Facility;
  3. the address of the Company;
  4. the partners, where the Company 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; or
  5. 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.

#### **12. REVOCATION OF PREVIOUS APPROVALS**

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.

## **REASONS**

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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 1 considered by the Director in issuing this Approval.

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

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

### **3. DOCUMENTATION REQUIREMENTS**

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

### **4. WRITTEN SUMMARY FORM**

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

### **5. OPERATION AND MAINTENANCE**

Condition No. 7 is included to require the Company to properly operate and maintain the

Processes with Significant Environmental Aspects to minimize the impact to the environment from these processes.

## **6. COMPLAINTS RECORDING AND REPORTING PROCEDURE**

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

## **7. RECORD KEEPING REQUIREMENTS**

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

## **8. EQUIPMENT WITH SPECIFIC OPERATIONAL LIMITS**

Condition No. 10 is included to provide the minimum performance requirement considered necessary to prevent an adverse effect resulting from the operation of the Recovery Furnace and to require the Company to gather accurate information so that the environmental impact and subsequent compliance with the EPA, the regulations and this Approval can be verified.

## **9. CHANGE OF OWNERSHIP**

Condition No. 11 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.

## **10. REVOCATION OF PREVIOUS APPROVALS**

Condition No. 12 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.

## APPEAL PROVISIONS

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In accordance with Section 139 of the *Environmental Protection Act*, you may by written notice served upon me and the Ontario Land Tribunal, within 15 days after the service of this notice, require a hearing by the Tribunal. You must also provide notice to, the Minister of the Environment, Conservation and Parks in accordance with Section 47 of the *Environmental Bill of Rights*, 1993 who will place notice of your appeal on the Environmental Registry. Section 142 of the *Environmental Protection Act* provides that the notice requiring the hearing ("the Notice") shall state:

1. 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;
2. 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*		The Minister of		The Director appointed for the
Ontario Land Tribunal		the Environment,		purposes of Part II.1 of the
655 Bay Street, Suite 1500	and	Conservation and	and	<i>Environmental Protection Act</i>
Toronto, Ontario		Parks		Ministry of the Environment,
M5G 1E5		777 Bay Street,		Conservation and Parks
<a href="mailto:OLT.Registrar@ontario.ca">OLT.Registrar@ontario.ca</a>		5th Floor		135 St. Clair Avenue West, 1st

Toronto, Ontario  
M7A 2J3

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 [Ontario Land Tribunal's](#)**

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 [Environmental Registry of Ontario](#), 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 4th day of March, 2025



Nancy Orpana

Director

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

c: Grace Liu, UMICORE PRECIOUS METALS CANADA INC.  
Jessica R Knox, WSP Canada Inc.

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

## **SCHEDULE 1**

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### **Supporting Documentation**

1. Environmental Compliance Approval Application and all supporting information, dated March 23, 2024, signed by Grace Liu and submitted by the Company;
2. Emission Summary and Dispersion Modelling Report, prepared by WSP Canada Inc. and dated March 20, 2024.

## **SCHEDULE 2**

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### **TEST CONTAMINANTS**

Hydrogen Chloride

Hydrogen Fluoride

Nitrogen Oxide

Sulphur Dioxide

Total Hydrocarbons, expressed as equivalent methane

Total Suspended Particulate Matter (< 44 microns in diameter)

### **METALS**

Antimony Arsenic

Cadmium Chromium

Cobalt Copper

Lead Manganese

Mercury Nickel

Silver Zinc

### **POLYCYCLIC AROMATIC HYDROCARBONS**

Acenaphthylene Acenaphthene

Anthracene Benzo(a)anthracene

Benzo(b)fluoranthene Benzo(k)fluoranthene

Benzo(a)fluorene Benzo(b)fluorene

Benzo(ghi)perylene Benzo(a)pyrene

Benzo(e)pyrene 2-chloronaphthalene

Chrysene Coronene

Dibenzo(a,c)anthracene 9,10-dimethylanthracene

Fluoranthene Fluorene

Indeno(1,2,3-cd)pyrene 2-methylanthracene

3-methylcholanthrene 1-methylnaphthalene

2-methylnaphthalene 1-methylphenanthrene

9-methylphenanthrene Naphthalene

Perylene Phenanthrene

Picene Pyrene

Tetralin Triphenylene

### **CO-PLANAR PCBs (DIOXIN-LIKE PCBs)**

PCB-077 (3,3',4,4'-TCB) PCB-081 (3,4,4',5-TCB)

PCB-105 (2,3,3',4,4'-PeCB) PCB-114 (2,3,4,4',5-PeCB)

PCB-118 (2,3',4,4',5-PeCB) PCB-123 (2',3,4,4',5-PeCB)  
PCB-126 (3,3',4,4',5-PeCB) PCB-156 (2,3,3',4,4',5-HxCB)  
PCB-157 (2,3,3',4,4',5'-HxCB) PCB-167 (2,3',4,4',5,5'-HxCB)  
PCB-169 (3,3',4,4',5,5'-HxCB) PCB-189 (2,3,3',4,4',5,5'-HpCB)

## ISOMERS OF POLYCHLORINATED DIBENZO-P-DIOXINS/DIBENZOFURANS

2,3,7,8-Tetrachlorodibenzo-p-dioxin 1,2,3,7,8-Pentachlorodibenzo-p-dioxin  
1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin 1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin  
1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin 1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin  
1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin 2,3,7,8-Tetrachlorodibenzofuran  
2,3,4,7,8-Pentachlorodibenzofuran 1,2,3,7,8-Pentachlorodibenzofuran  
1,2,3,4,7,8-Hexachlorodibenzofuran 1,2,3,6,7,8-Hexachlorodibenzofuran  
1,2,3,7,8,9-Hexachlorodibenzofuran 2,3,4,6,7,8-Hexachlorodibenzofuran  
1,2,3,4,6,7,8-Heptachlorodibenzofuran 1,2,3,4,7,8,9-Heptachlorodibenzofuran  
1,2,3,4,6,7,8,9-Octachlorodibenzofuran

## **SCHEDULE 3**

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### **SOURCE TESTING PROCEDURES**

1. The Company shall submit, at least two (2) months prior to the scheduled date of the Source Testing, to the Manager a Pre-Test Plan for the Source Testing of the targeted sources. The Company shall finalize the Pre-Test Plan in consultation with the Manager.
2. The Company shall not commence the Source Testing required under this Approval until the Manager has approved the Pre-Test Plan.
3. The Company shall complete the Source Testing not later than three (3) months after the Manager has approved the Pre-Test Plan.
4. The Company shall notify the Manager, the District Manager and the Director in writing of the location, date and time of any impending Source Testing required by this Approval, at least fifteen (15) days prior to the Source Testing.
5. The Company shall submit a report (hardcopy and electronic format) on the Source Testing to the Manager, the District Manager and the Director not later than three (3) months after completing the Source Testing. The report shall be in the format described in the Source Testing Code, and shall also include, but not be limited to:
  - (1) an executive summary;
  - (2) an identification of the applicable North American Industry Classification System code (NAICS) for the facility;
  - (3) records of operating conditions at the time of Source Testing;
  - (4) results of Source Testing, including the emission rate, emission concentration, and relevant emission factor of the Test Contaminants from the Targeted Sources; and
  - (5) a tabular comparison of Source Testing results for the Targeted Sources and Test Contaminants to original emission estimates described in the Company's application and 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 Manager, the District Manager and Director 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.

If the Source Testing results indicate the emission estimates are higher than the original emission estimates described in the Company's application and the ESDM Report, the Company shall update their ESDM Report in accordance with Section 26 of O. Reg. 419 with the emission estimates from the source testing report and make these records available for review by staff of the Ministry upon request. The updated Emission Summary Table from the updated ESDM Report shall be submitted with the report on the Source Testing.

## **SCHEDULE 4**

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### **IN-STACK EMISSION LIMITS**

Total Suspended Particulate Matter - 14 mg/Rm3  
Cadmium - 7 ug/Rm3  
Lead - 60 ug/Rm3  
Mercury - 20 ug/Rm3  
Dioxins and Furans - 80 pg/Rm3 as ITEQ  
Sulphur Dioxide (SO<sub>2</sub>) - 21 ppmdv (56 mg/Rm3)  
Hydrochloric acid (HCl) - 18 ppmdv (27 mg/Rm3)  
Nitrogen Oxides (NO<sub>x</sub>) - 105 ppmdv (198 mg/Rm3)  
Organic matter - 50 ppmdv (33 mg/Rm3)  
(undiluted, expressed as equivalent methane)

#### Notes:

mg/Rm3 means milligrams per cubic metre at Reference flue gas conditions.  
ug/Rm3 means micrograms per cubic metre at Reference flue gas conditions.  
pg/Rm3 means picograms per reference cubic metre at Reference flue gas conditions.  
ppmv means parts per million by volume.

Reference flue gas conditions means: Temperature = 25 degrees Celsius

Pressure = 101.3 kilopascals

Oxygen content = 11%

Water content = nil (dry conditions)

#### Dioxins and Furans

International toxicity equivalency factors (I-TEFs) are applied to 17 isomers of dioxins and furans of concern to convert them into 2,3,7,8-CDD (tetrachlorodibenzo-p-dioxin) toxicity equivalents. The conversion involves multiplying the concentration of the isomer by the appropriate I-TEF to yield the TEQ for this isomer. Summing the individual TEQ values for each of the isomers of concern provides the total toxicity equivalent level for the sample mixture. A table listing the 17 isomers of concern and their I-TEFs can be found in the MOE publication titled: Environmental Information - Dioxins & Furans; PIBS 681b, revised 08/91.

## **SCHEDULE 5**

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### **CONTINUOUS MONITORING SYSTEMS**

#### **PARAMETER: TEMPERATURE**

**INSTALLATION:** The sample point for the continuous temperature monitor shall be located in the secondary chamber of the Recovery Furnace where the minimum retention time of the combustion gases at a minimum temperature of 1000 degrees Celsius for at least one (1) second is achieved.

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

Type: shielded "K" type thermocouple or equivalent

Accuracy:  $\pm 1.5$  percent of the minimum gas temperature.

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

**RELIABILITY:** The monitor shall be operated and maintained so that accurate data is obtained during a minimum of 95 percent of the time for each calendar quarter.

#### **PARAMETER: OXYGEN**

**INSTALLATION:** The continuous oxygen monitor shall be installed at an accessible location where the measurements are representative of the actual concentration of oxygen in the undiluted gases exiting the secondary combustion chamber of the Recovery Furnace and shall meet the following installation specifications:

Range (percentage): 0 - 20 or 0 - 25

Calibration Gas Ports: close to the sample point.

**PERFORMANCE:** The Continuous Oxygen Monitor shall meet the following minimum performance specifications for the following parameters.

Span Vale (nearest ppm equivalent): 2 times the average normal concentration of the source

Relative Accuracy:  $< 10$  percent of the mean value of the reference method test data

Calibration Error: 0.25 percent O<sub>2</sub>

System Bias:  $< 4$  percent of the mean value of the reference method test data

Procedure for Zero and Span Calibration Check: all system components checked

Zero Calibration Drift (24-hour):  $< 0.5$  percent O<sub>2</sub>

Span Calibration Drift (24-hour): < 0.5 percent O<sub>2</sub>  
Response Time (90 percent of full scale): < 90 seconds  
Operational Test Period: > 168 hours without corrective maintenance.

**CALIBRATION:** Daily calibration drift checks on the monitor shall be performed and recorded in accordance with the requirements of Report EC32102.

**DATA RECORDER:** The data recorder must be capable of registering continuously the measurement of the monitor with an accuracy of 0.5 percent of a full scale reading or better and with a time resolution of 2 minutes or better.

**RELIABILITY:** The monitor shall be operated and maintained so that accurate data is obtained during a minimum of 90 percent of the time for each calendar quarter during the first full year of operation, and 95 percent, thereafter.

### **PARAMETER: CARBON MONOXIDE**

**INSTALLATION:** The continuous carbon monoxide monitor shall be installed at an accessible location where the measurements are representative of the actual concentration of carbon monoxide in the undiluted gases exiting the secondary combustion chamber of the Recovery Furnace and shall meet the following installation specifications:

Range (parts per million, ppm): 0 -200  
Calibration Gas Ports: close to the sample point.

**PERFORMANCE:** The continuous carbon monoxide monitor shall meet the following minimum performance specifications for the following parameters:

Span Value: (nearest ppm equivalent) 2 times the average normal concentration of the source  
Relative Accuracy: < 10 percent of the mean value of the reference method test data or  $\pm 5$  ppm whichever is greater  
Calibration Error: < 2 percent of actual concentration  
System Bias: < 4 percent of the mean value of the reference method test data  
Procedure for Zero and Span Calibration Check: all system components check  
Zero Calibration Drift (24-hour): < 5 percent of span value  
Span Calibration Drift (24-hour): < 5 percent of span value  
Response Time (90 percent of full scale): < 90 seconds  
Operational Test Period : > 168 hours without corrective maintenance.

**CALIBRATION:** Daily calibration drift checks on the monitor shall be performed and recorded in accordance with the requirements of Report EC32102.

**DATA RECORDER:** The data recorder must be capable of registering continuously the measurement of the monitor with an accuracy of 0.5 percent of a full scale reading or better

and with a time resolution of 2 minutes or better.

**RELIABILITY:** The monitor shall be operated and maintained so that accurate data is obtained during a minimum of 90 percent of the time for each calendar quarter during the first full year of operation, and 95 percent, thereafter.