

AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 7470-DHLQBY
Issue Date: June 27, 2025

CSL Silicones Inc.
144 Woodlawn Road West
Guelph, Ontario
N1H 1B5

Site Location: 144 Woodlawn
144 Woodlawn Road West , CSL Silicones,
Guelph City, County of Wellington
N1H 1B5

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:

silicone-based coating and sealants manufacturing facility, operating at the maximum 25.32 tonnes per day of silicone-based coatings and 8.4 tonnes per day of silicone sealants, consisting of the following processes and support units:

- one (1) exhaust system, serving a coatings room (source EF04 - High Level Exhaust), discharging to the air at a nominal volumetric flow rate of 1.18 cubic metres per second, through stack, having an exit diameter of 1.08 metres, extending 0.5 metre above the roof and 10.3 metres above grade;
- one (1) exhaust system, serving a coatings room (source EF05 - Low Level Exhaust), discharging to the air at a nominal volumetric flow rate of 2.36 cubic metres per second, through stack, having an exit diameter of 1.08 metres, extending 0.5 metre above the roof and 10.3 metres above grade;
- two (2) tank expansion vents, serving cleansol and hydrolysate storage tanks (source EF19 and EF20) each discharging to the air through a stack, each having an exit diameter of 0.15 metre, each extending 0.61 metre above the roof and 10.36 metres above grade;
- one (1) exhaust system, serving a reactor room (source EF31 - Low Level Exhaust #1), discharging to the air at a nominal volumetric flow rate of 0.71 cubic metre per second through stack, having an exit diameter of 0.76 metre, extending 0.46 metre above the roof and 6.1 metres above grade;

- one (1) exhaust system serving a reactor room (source EF31 - Low Level Exhaust #2), discharging to the air at a nominal volumetric flow rate of 0.24 cubic metre per second through stack, having an exit diameter of 0.41 metre, extending 0.46 metre above the roof and 6.1 metres above grade;
- one (1) exhaust system serving a reactor room (source EF35 - Open Hole), discharging passively to the air through stack, having an exit diameter of 1.53 metres, extending 0.46 metre above the roof and 6.1 metres above grade;
- one (1) cooling tower (source CT37), having a nominal circulation water flow rate of 14 litres per second;
- one (1) natural gas-fired process boiler (source EF39), having a maximum thermal input of 2,210,350 kilojoules per hour, discharging to the air through a stack, having an exit diameter of 0.30 metre, extending 2.5 metres above the roof and 8.1 metres above grade;
- one (1) exhaust system (sources EF54) serving the QA/QC laboratory,
- three (3) exhaust systems (source LEF1a, LEF1b and LEF2) serving R&D laboratory;
- one (1) vapours intrusion mitigation system, equipped with a minimum of two (2) granular activated carbon units connected in series, discharging to the air through a stack at a nominal volumetric flow rate of 0.042 actual cubic metre per second, having an exit diameter of 0.08 metre, extending 1.0 metre above the roof and 10.75 metres above grade;
- two (2) dust collectors serving a sealant room and a coating room (sources DC1 and DC2), discharging back to the plant air; and
- general exhaust systems serving a sealant room (source SEAL Sealant Room) and a set-up room (source EF33 Setup Room Exhaust);

all in accordance with the Application for an Environmental Compliance Approval submitted by CSL Silicones Inc, dated June 6, 2024 and signed by Bruce Lacey, Operations Manager and all supporting information including the Revised Emission Summary and Dispersion Modelling Report prepared by RWDI Air Inc. dated June 13, 2025 and prepared by Claire Finoro, P.Eng., PMP Senior Project Manager; and the Acoustic Assessment Report prepared by RWDI AIR Inc., dated July 4, 2024 and signed by Gillian Redman.

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

1. "Approval" means this Environmental Compliance Approval, including the application and supporting documentation listed above;
2. "Company" means CSL Silicones Inc. operating as CSL Silicones 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;
3. "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;
4. "District Manager" means the District Manager of the appropriate local district office of the Ministry, where the Facility is geographically located;

5. "EPA" means the *Environmental Protection Act*, R.S.O. 1990, c.E.19;
6. "Equipment" means the equipment described in the Company's application, this Approval and in the supporting documentation submitted with the application, to the extent approved by this Approval;
7. "Exhausted" means the capacity of the granular activated carbon filter to adsorb contaminant emissions is reached, and the granular activated carbon filter unit is no longer able to effectively reduce emissions;"
8. "Facility" means the entire operation located on the property where the Equipment is located;
9. "Manual" means a document or a set of documents that provide written instructions to staff of the Company;
10. "Ministry" means the ministry of the government of Ontario responsible for the EPA and includes all officials, employees or other persons acting on its behalf; and
11. "Publication NPC-300" means the Ministry Publication NPC-300, "Environmental Noise Guideline, Stationary and Transportation Sources – Approval and Planning, Publication NPC-300", August 2013, as amended.

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

TERMS AND CONDITIONS

1. OPERATION AND MAINTENANCE

1. The Company shall ensure that the Equipment is properly operated and maintained at all times. The Company shall:
 - a. prepare, not later than three (3) months after the date of this Approval, and update, as necessary, a Manual outlining the operating procedures and a maintenance program for the Equipment, including:
 - i. routine operating and maintenance procedures in accordance with good engineering practices and as recommended by the Equipment suppliers;
 - ii. emergency procedures, including spill clean-up procedures;
 - iii. procedures for any record keeping activities relating to operation and maintenance of the Equipment;
 - iv. all appropriate measures to minimize noise and odorous emissions from all potential sources; and
 - v. the frequency of inspection and replacement of the filter material in the Equipment;
 - vi. The Company shall ensure that the granulated activated carbon in the Equipment is replaced before it is Exhausted.
 - b. implement the recommendations of the Manual.

2. RECORD RETENTION

1. The Company shall retain, for a minimum of two (2) years from the date of their creation, all records and information related to or resulting from the recording activities required by this Approval, and make these records available for review by staff of the Ministry upon request. The Company shall retain:
 - a. all records on the maintenance, repair and inspection of the Equipment; and
 - b. all records of any environmental complaints, including:
 - i. a description, time and date of each incident to which the complaint relates;
 - ii. wind direction at the time of the incident to which the complaint relates; and
 - iii. a description of the measures taken to address the cause of the incident to which the complaint relates and to prevent a similar occurrence in the future.

3. NOTIFICATION OF COMPLAINTS

1. The Company shall notify the District Manager, in writing, of each environmental complaint within two (2) business days of the complaint. The notification shall include:
 - a. a description of the nature of the complaint; and
 - b. the time and date of the incident to which the complaint relates.

4. NOISE

1. The Company shall, at all times, ensure that the noise emissions from the Facility comply with the limits set in Ministry Publication NPC-300.
2. The Company shall restrict the bulk liquid chemical truck delivery activities to the hours from 7 a.m. to 11 p.m.

5. CHANGE OF OWNERSHIP

1. The Company shall notify the Director in writing, and forward a copy of the notification to the District Manager, within thirty (30) days of the occurrence of any of the following changes to Facility operations:
 - a. the ownership of the Facility;
 - b. the operator of the Facility;
 - c. the address of the Company;
 - d. the partners, where the Company is or any time becomes a partnership and a copy of the most recent declaration filed under the Business Names Act, R.S.O. 1990, c. B.17, shall be included in the notification; or
 - e. the name of the corporation where the Company is or at any time becomes a corporation, other than a municipal corporation, and a copy of the most current information filed under the Corporations Information Act, R.S.O. 1990, c. C.39, shall be included in the notification.

2. In the event of any change in ownership of the Facility, the Company shall notify the successor of the existence of this Approval and provide the successor with a copy of this Approval, and the Company shall provide a copy of the notification to the District Manager and the Director.

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

1. Condition No. 1 is included to emphasize that the Equipment must be maintained and operated according to a procedure that will result in compliance with the EPA, the Regulations and this Approval.
2. Condition No. 2 is included to require the Company to keep records and to provide information to staff of the Ministry so that compliance with the EPA, the Regulations and this Approval can be verified.
3. Condition No. 3 is included to require the Company to notify staff of the Ministry so as to assist the Ministry with the review of the site's compliance.
4. Condition No. 4.1 is included to provide the minimum performance requirements considered necessary to prevent an adverse effect resulting from the operation of the Facility.
5. Condition No. 4.2 is included to ensure that the bulk liquid chemical truck delivery activities are not extended beyond the stated hours to prevent an adverse effect resulting from the operation of the Equipment.
6. Condition No. 5 is included to require the Company to notify/report to the Ministry so that compliance with the EPA, the regulations and this Approval can be verified.

Upon issuance of the environmental compliance approval, I hereby revoke Approval No(s). 7123-AKUKU6 issued on June 20, 2017.

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

- a. The portions of the environmental compliance approval or each term or condition in the environmental compliance approval in respect of which the hearing is required, and;
- b. The grounds on which you intend to rely at the hearing in relation to each portion appealed.

Pursuant to subsection 139(3) of the *Environmental Protection Act*, a hearing may not be required with respect to any terms and conditions in this environmental compliance approval, if the terms and conditions are substantially the same as those contained in an approval that is amended or revoked by this environmental compliance approval.

The Notice should also include:

1. The name of the appellant;
2. The address of the appellant;
3. The environmental compliance approval number;
4. The date of the environmental compliance approval;
5. The name of the Director, and;
6. The municipality or municipalities within which the project is to be engaged in.

And the Notice should be signed and dated by the appellant.

This Notice must be served upon:

Registrar*
Ontario Land Tribunal
655 Bay Street, Suite 1500
Toronto, Ontario
M5G 1E5
OLT.Registrar@ontario.ca

and

The Minister of the Environment,
Conservation and Parks
777 Bay Street, 5th Floor
Toronto, Ontario
M7A 2J3

and

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

* **Further information on the Ontario Land Tribunal's requirements for an appeal can be obtained directly from the Tribunal at: Tel: (416) 212-6349 or 1 (866) 448-2248, or www.olt.gov.on.ca**

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

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

DATED AT TORONTO this 27th day of June, 2025



Nancy E Orpana, P.Eng.

Director

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

JK/

c: District Manager, MECP Guelph
Khalid Hussein, RWDI AIR Inc.