

AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 6580-DAS6S4

Issue Date: August 24, 2025

FCA Canada Inc.
2199 Chrysler Centre Road
Windsor, Ontario
N9A 4H6

Site Location: 2199 Chrysler Centre Road
Windsor City, County of Essex
N9A 4H6

*You have applied under section 20.2 of Part II.1 of the Environmental Protection Act ,
R.S.O. 1990, c. E. 19 (Environmental Protection Act) for approval of:*

Description Section

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

- welding;
- washing;
- phosphate coating;
- E-coating;
- painting;
- assembly;
- trim/chassis/final
- vehicle completion;
- maintenance;
- water treatment;
- powerhouse;
- miscellaneous;
- Regenerative Thermal Oxidizers (RTO's);
- natural gas fired boilers;

Non-production operations on-site include:

- Stormwater Management;
- Waste Management; and

including the *Equipment* and any other ancillary and support processes and activities, operating at a *Facility Production Limit* of up to 788,400 fully assembled automotive vehicles per year, exhausting to the air and discharging to the natural environment as described in this *Approval* and the *Schedules*.

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

1. "*ACB list*" means the document titled "Air Contaminants Benchmarks (ACB) List: Standards, guidelines and screening levels for assessing point of impingement concentrations of air contaminants", as amended from time to time and published by the *Ministry* and available on a website of the Government of Ontario.
2. "*Acceptable Point of Impingement Concentration*" is initially set out in the *Original ESDM Report* and 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.
3. "*Acoustic Assessment Report*" means the report, prepared by Slavi Grozev of RWDI AIR Inc. and dated June 18, 2024 in accordance with *Publication NPC-233* and Appendix A of the *Basic Comprehensive User Guide*, submitted in support of the application, that documents all sources of noise emissions and *Noise Control Measures* present at the *Facility*, as updated in accordance with Condition 4 of this *Approval*.

4. "*Acoustic Assessment Summary Table*" means a table prepared in accordance with the *Basic Comprehensive User Guide* summarising the results of the *Acoustic Assessment Report*, as updated in accordance with Condition 4 of this *Approval*.
5. "*Acoustic Audit*" means an investigative procedure consisting of measurements and/or acoustic modelling of all sources of noise emissions due to the operation of the *Facility*, assessed to determine compliance with the *Performance Limits* for the *Facility* regarding noise emissions, completed in accordance with the procedures set in *Publication NPC-103* and reported in accordance with *Publication NPC-233*.
6. "*Acoustic Audit Report*" means a report presenting the results of an *Acoustic Audit*, prepared in accordance with *Publication NPC-233*.
7. "*Acoustical Consultant*" means a person currently active in the field of environmental acoustics and noise/vibration control, who is familiar with Ministry noise guidelines and procedures and has a combination of formal university education, training and experience necessary to assess noise emissions from a *Facility*.
8. "*Annual Modification Summary*" means the report prepared on an annual basis summarizing the records kept in the *Log*, which records any *Modifications* made at the *Facility*.
9. "*Approval*" means this entire Environmental Compliance Approval and any *Schedules* to it.
10. "*Basic Comprehensive User Guide*" means the *Ministry* document titled "Basic Comprehensive Certificates of Approval (Air) User Guide" dated March 2011, as amended.
11. "*Company*" means FCA Canada Inc. that is responsible for the construction or operation of the *Facility* and includes any successors and assigns.
12. "*Compound of Concern*" means a contaminant described in paragraph 4 subsection 26 (1) of O. Reg. 419/05, namely a contaminant that is discharged from the *Facility* in an amount that is not negligible.
13. "*Description Section*" means the section on page one of this *Approval* describing the *Company's* operations and the *Equipment* located at the *Facility* and specifying the *Facility Production Limit* for the *Facility*.
14. "*Design and Operation Report*" means the report submitted by the

Company titled "FCA Canada Inc., Waste Transfer and Processing Environmental Compliance Approval (ECA)" Version 2.0, dated August 7, 2025, and prepared by Alexander Ramessar, FCA Canada Inc, including all supporting documentation and amending documents, describing the design and operation of the Waste Management System.

15. "*Director*" means a person appointed for the purposes of Part II.1 of the *EPA* by the *Minister* pursuant to section 5 of the *EPA*.
16. "*District Manager*" means the District Manager of the appropriate local district office of the Ministry where the Works is geographically located, Sarnia/Windsor District Office in this *Approval*.
17. "*Emission Summary Table*" means a table described in paragraph 14 of subsection 26 (1) of *O. Reg. 419/05*.
18. "*Empty Container*" has the same meaning as defined in Reg. 347.
19. "*Environmental Assessment Act*" means the *Environmental Assessment Act*, R.S.O. 1990, c.E.18, as amended.
20. "*Environmental Management System*" means the *Company's* set of processes and practices implemented in a comprehensive, systematic, planned and documented manner, including the organizational structure, planning and resources for developing, implementing and maintaining policy for environmental protection, as certified under *ISO 14001*.
21. "*EPA*" means the *Environmental Protection Act*, R.S.O. 1990, c.E.19, as amended.
22. "*Equipment*" means equipment, works or processes described in the *ESDM Report*, *Acoustic Assessment Report*, *Stormwater Management Report*, *Design and Operation Report*, this *Approval* and in the *Schedules* referred to herein and any other equipment or processes.
23. "*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*.
24. "*Facility*" means the entire operation located on the property where the *Equipment* is located.

25. "*Facility Production Limit*" means the production limit placed by the *Director* on the main product(s) or raw materials used by the *Facility*.
26. "*FCA Canada Inc. Wastewater Treatment Plant*" means FCA Canada Inc.'s Wastewater Treatment Plant located at 2665 Grand Marais Road East, Windsor, Ontario, N8X 5X6.
27. "*FCA Canada Inc. Research and Development CTR*" means FCA Canada Inc.'s Research and Development Centre located at 3939 Rhodes Drive, Windsor, Ontario, N8W 5B5.
28. "*Independent Acoustical Consultant*" means an *Acoustical Consultant* who is not representing the Company and was not involved in preparing the Acoustic Assessment Report or the design/implementation of *Noise Control Measures* for the *Facility* and/or *Equipment*. The *Independent Acoustical Consultant* shall not be retained by the *Acoustical Consultant* involved in the noise impact assessment or the design/implementation of *Noise Control Measures* for the *Facility* and/or *Equipment*.
29. "*ISO 14001*" means the International Organization Standardization international standard that specifies the requirements for an effective *Environmental Management System*.
30. "*Log*" means the documentation that contains an ongoing record of each change that is required to be made to the *ESDM Report*, *Acoustic Assessment Report*, *Stormwater Management Report* and the *Design and Operation Report* as a result of a *Modification* described in Condition 2 including the date on which the change occurred.
31. "*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* and the *OWRA* under the Executive Council Act.
32. "*Ministry*" means the ministry of the *Minister*.
33. "*Modification*" means any construction, alteration, extension, enlargement 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, alter noise or vibration emissions, alter the management of stormwater, or alter the management of waste, at or from the *Facility*.

34. "*Noise Abatement Action Plan*" means the noise abatement program developed by the *Company*, submitted to the *Director* and *District Manager* and approved by the *Director*, designed to achieve compliance with the sound level limits set in *Publication NPC-300*. It also means the *Noise Abatement Action Plan* outlined in Appendix E of the *Acoustic Assessment Report*.
35. "*Noise Control Measures*" means measures to reduce the noise emissions from the *Facility* and/or *Equipment* including, but not limited to, silencers, acoustic louvres, enclosures, absorptive treatment, plenums and barriers. It also means the noise control measures outlined in Appendix E of the *Acoustic Assessment Report*.
36. "*O. Reg. 419/05*" means Ontario Regulation 419/05, Air Pollution – Local Air Quality, as amended.
37. "*Odour Management Plan*" means a document or a set of documents that provides written instructions to staff of the *Company* for the purpose of meeting the requirements of Terms and Conditions No. 6.4 of this *Approval*.
38. "*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 RWDI Air Inc. and dated July 19, 2024, submitted in support of the application; and includes any changes to the report made up to the date of issuance of this *Approval*.
39. "*OWRA*" means the *Ontario Water Resources Act*, R.S.O 1990, c.040, as amended.
40. "*Point of Impingement*" has the same meaning as in section 2 of *O. Reg. 419/05*.
41. "*Point of Reception*" means Point of Reception as defined by *Publication NPC-300*.
42. "*Procedure Document*" means the *Ministry* guidance document titled "Procedure for Preparing an Emission Summary and Dispersion Modelling Report" dated March 2018, as amended.
43. "*Processes with Significant Environmental Aspects*" means the processes, non-production activities, and *Equipment*, that are identified through implementation of the *Environmental Management System* as being significant sources of emissions to the air or discharging to the natural environment.

44. "*Publication NPC-103*" means the *Ministry Publication NPC-103* of the Model Municipal Noise Control By-Law, Final Report, August 1978, published by the Ministry, as amended.
45. "*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.
46. "*Publication NPC-233*" means the *Ministry* Publication NPC-233, "Information to be Submitted for Approval of Stationary Sources of Sound", October 1995, as amended.
47. "*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.
48. "*Regenerative Thermal Oxidizer*" and "*RTO*" mean the piece of pollution control equipment used for the treatment of exhaust gas using thermal oxidization to destroy contaminants from the exhaust gas.
49. "*Regulation 347*" means Regulation 347, R.R.O. 1990, General - Waste Management, made under the *EPA*, as amended.
50. "*Schedules*" means the schedules attached to this *Approval* and forming part of this *Approval*.
51. "*Sensitive Receptor*" means any location where routine or normal activities occurring at reasonably expected times would experience adverse effect(s) from odour discharges from the *Facility*, including one or a combination of:
 - a. private residences or public facilities where people sleep (e.g. single and multi-unit dwellings, nursing homes, hospitals, trailer parks, camping grounds, etc.),
 - b. institutional facilities (e.g.: schools, churches, community centres, day care centres, recreational centres, etc.),
 - c. outdoor public recreational areas (e.g.: trailer parks, play grounds, picnic areas, etc.), and
 - d. other outdoor public areas where there are continuous human activities (e.g.: commercial plazas and office buildings).
52. "*Stormwater Management Report*" means the report entitled

"Stormwater Management Analysis Report - Windsor Assembly Plant" dated June 2024 and prepared by Dillon Consulting Limited, in accordance with the *Ministry* document "Stormwater Management Planning and Design Manual – March 2003", as amended.

53. "*Subject Waste*" has the same meaning as in *Regulation 347*.
54. "*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.
55. "*Waste Management System*" means the vehicles, equipment and infrastructure used for the transportation, storage and handling of waste.
56. "*Works*" means the works for the collection, transmission, and disposal of stormwater from the site to a municipal drain known as Grand Marais Drain, or to the City of Windsor storm sewer system.

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

TERMS AND CONDITIONS

1. GENERAL

1. Except as otherwise provided by this *Approval*, the *Facility* shall be designed, developed, built, operated and maintained in accordance with the terms and conditions of this *Approval* and in accordance with the following *Schedules* attached hereto:
 - Schedule A - Supporting Documentation
 - Schedule B - Air Emissions
 - Schedule C - RTO Temperature Monitoring
 - Schedule D - Sewage Works
 - Schedule E - Waste Management

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, enlargement or replacements are approved in this *Approval* if the future construction, alterations, extensions, enlargement 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*;
- c. result in compliance with the performance limits as specified in Condition 3;
- d. do not negatively impact the quality of water collected by the *Works*;
- e. do not negatively affect the approved effluent quality or the location of the discharge/outfall;
- f. adhere to the design guidelines contained within the Ministry's publication "Stormwater Management Planning and Design Manual – March 2003", as amended; and
- g. do not include the processing of *Subject Waste*, or the management of additional *Subject Waste*.

2. Condition 2.1 does not apply to:

- a. any *Equipment* related to the thermal oxidation of waste or waste derived fuels (as defined in *Regulation 347*);
- b. *Modifications* to the *Facility* that would be subject to the *Environmental Assessment Act*; and
- c. *Modifications* that include the processing of *Subject Waste*, the management of additional *Subject Waste*, the management of putrescible waste, or the management of wastes generated from activities other than automotive vehicle parts handling and facility maintenance.

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, in which case it expires on the revocation date.

3. PERFORMANCE LIMITS

1. Subject to Condition 3.2, 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.

3. Condition 3.1 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.

4. The *Company* shall ensure that any *Equipment* that is specifically referenced in the *Ministry* document Guideline A-9, NO_x Emissions from Boilers and Heaters, dated March 2001, as amended, meets all requirements in the *Ministry* document.

5. The *Company* shall operate each of the *RTO* in such a manner that;

- a. the combustion chamber is preheated to the minimum temperature as per the manufacturers’ requirements or as determined by a person currently active in the field of pollution control, who has a combination of formal education, training and experience necessary to assess the air emissions and pollution controls at the *Facility*, as measured by the continuous monitoring and recording system, prior to introducing the solvent laden process exhaust gases;

- b. the temperature in the combustion chamber is maintained at the minimum required temperature as per the manufacturers’ requirements or as determined by a person currently active in the field of pollution control, who has a combination of formal education, training and experience necessary to assess the air emissions and pollution controls at the *Facility*, as measured by the continuous monitoring and recording system, at all times, when the *RTO* are treating solvent laden process exhaust gases;

- c. no substances containing chlorinated and/or fluorinated compounds, are burned in the *RTO*;
- d. the concentration of the organic matter in the undiluted exhaust gases leaving the *RTO* , having a carbon content, expressed as equivalent methane, being an average of ten measurements taken at approximately one-minute intervals, shall not be greater than 100 parts per million by volume; and
- e. the *Company* shall install, conduct and maintain a program to continuously monitor the temperature in the combustion chamber, when the *RTO* are in operation; the continuous monitoring system shall be equipped with continuous recording devices and shall comply with the requirements in Schedule C - RTO Temperature Monitoring of this *Approval*.

6. *The Company shall:*

- a. implement not later than December 31, 2025, the Noise Control Measures outlined in phase 10 of the Noise Abatement Action Plan;
- b. implement not later than December 31, 2027, the Noise Control Measures outlined in phase 11 of the Noise Abatement Action Plan;
- c. implement not later than December 31, 2028, the Noise Control Measures outlined in phase 12 of the Noise Abatement Action Plan;
- d. implement not later than December 31, 2029, the Noise Control Measures outlined in phase 13 of the Noise Abatement Action Plan;
- e. implement not later than December 31, 2030, the Noise Control Measures outlined in phase 14 of the Noise Abatement Action Plan;
- f. implement not later than December 31, 2031 the Noise Control Measures outlined in phase 15 of the Noise Abatement Action Plan;
- g. implement not later than December 31, 2032 the Noise Control Measures outlined in phase 16 of the Noise Abatement Action Plan;
- h. implement not later than December 31, 2033 the Noise Control Measures outlined in phase 17 of the Noise Abatement Action Plan;
- i. implement not later than December 31, 2034 the Noise Control Measures outlined in phase 18 of the Noise Abatement Action Plan;
- j. implement not later than December 31, 2035 the Noise Control Measures outlined in phase 19 of the Noise Abatement Action Plan; and
- k. implement not later than December 31, 2036 the Noise Control Measures outlined in phase 20 of the Noise Abatement Action Plan.

7. *The Company shall ensure, subsequent to the implementation of the Noise Control*

Measures that the noise emissions from the *Facility* comply with the limits set in *Ministry Publication NPC-300*.

8. The *Company* shall ensure that the *Noise Control Measures* are properly maintained and continue to provide the acoustical performance outlined in the *Acoustic Assessment Report*.
9. 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*.
10. The *Company* shall ensure the *Works* are operated and maintained in accordance with the *Stormwater Management Report* and Schedule D – Sewage Works in this *Approval*.
11. The *Company* shall ensure all waste is managed in accordance with Schedule E – Waste Management in this *Approval*.

4. 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* so that the information in the report is accurate as of December 31 in the previous year.
3. No later than March 31 in each year, the *Company* shall update the *Acoustic Assessment Report* so that the information in the report is accurate as of December 31 in the previous year.
4. The *Company* shall make the *Emission Summary Table* (see section 27 of *O. Reg. 419/05*), and the *Acoustic Assessment Summary Table*, available for examination by any person, without charge, by posting it on the Internet or by making it available during regular business hours at the *Facility*.
5. The *Company* shall maintain up-to-date records of the results of the inspections required by Schedule D - Sewage Works and any cleaning and maintenance operations undertaken on the *Works* and shall keep the records at the operational headquarters of the *Company*. The records shall include the following:
 - a. the name of the *Works*;
 - b. the date and results of each inspection, maintenance and cleaning, including an estimate of the quantity of any material removed; and
 - c. the date of each reportable spill at the *Facility*, including follow-up actions/remedial measures undertaken.
6. The *Company* shall, within three (3) months after the expiry of Condition 2.1 of this *Approval*, update the *ESDM Report*, the *Acoustic Assessment Report*, the *Stormwater Management Report*, and the *Design and Operation Report*

such that the information in the reports is accurate as of the date that Condition 2.1 of this *Approval* expired.

7.

5. REPORTING REQUIREMENTS

1. Subject to Condition 5.2, the *Company* shall prepare no later than June 30 of each year, an *Annual Modification Summary* that shall include the following:
 - a. a declaration of whether the *Facility* was in compliance with sections 9 and 27 of the *EPA, O. Reg. 419/05*, section 53 of the *OWRA*, and the conditions of this *Approval*.
 - b. a declaration that each *Modification* that took place in the previous calendar year that resulted in a change in the previously calculated concentration at a *Point of Impingement* for any *Compound of Concern* or resulted in a change in the sound levels reported in the *Acoustic Assessment Summary Table* at any *Point of Reception* satisfies Condition 2.1 and a summary of each such *Modification*.
 - c. a declaration that each *Modification* that took place in the previous calendar year that resulted in a change in the *Works* satisfies Condition 2.1 and a summary of each such *Modification*.
 - d. a declaration that each *Modification* that took place in the previous calendar year that resulted in a change in the *Waste Management System* satisfies Condition 2.1 and a summary of each such *Modification*.
2. Condition 5.1 does not apply if Condition 2.1 has expired.
3. If the implementation of the *Modification* requires changes to be made to the Emergency Response, Spill Reporting and Contingency Plan, the *Company* shall, if required, provide a revised copy of these plans to the local fire services authority prior to implementing the *Modification*.
4. Subject to Section D6.1 of the Schedule D of the *Approval*, the *Company* shall prepare a monitoring report on a calendar year basis and submit to the District Manager in an electronic format by **March 31** of the calendar year following the period being reported upon. The required information is outlined in the Section D6.1 of Schedule D – Sewage Works.

6. OPERATING PROCEDURES AND MAINTENANCE PROGRAMS

1. The *Company* shall, not later than six (6) months after the date of this *Approval*, implement operating procedures and maintenance programs in accordance with the *Environmental Management System*.
2. The *Environmental Management System* shall, for all *Processes with*

Significant Environmental Aspects, specify as a minimum:

- a. frequency of inspections and scheduled preventative maintenance;
 - b. procedures to prevent upset conditions;
 - c. procedures to assess and, if required, minimize all fugitive emissions;
 - d. procedures to prevent and/or minimize odorous emissions;
 - e. procedures to prevent and/or minimize noise emissions;
 - f. procedures to prevent and/or minimize spills, leaks or spillage;
 - g. procedures for record keeping activities relating to the operation and maintenance programs;
 - h. procedures to ensure proper operation and maintenance of the *Works* and to prevent and/or minimize spills, leaks or spillage; and
 - i. procedures for recording proper operation of the *Waste Management System* and the waste handling practices.
3. The *Company* shall ensure that all *Processes with Significant Environmental Aspects*, are operated and maintained in accordance with this *Approval*, the operating procedures and maintenance programs.
4. The *Company* shall, not later than three (3) months after the date of this *Approval*, prepare and implement the *Odour Management Plan*, which is periodically (e.g. annually) reviewed and updated as necessary, identifying elements of operation of the *Facility* that have a potential to release odour including fugitive odour and outlining the physical and procedural controls such as policies and standard operating procedures; and corrective actions, and communication and management reviews required to achieve the objective of managing odour associated with the operation of the *Facility* in order to prevent or mitigate any odour impacts on the *Sensitive Receptor*.

7. 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 one (1) week 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.

8. RECORD KEEPING REQUIREMENTS

- 1. Any information requested by any employee 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 ten (10) years from the date of their creation all reports, records and information described in this *Approval*, including:
 - a. a copy of the *Original ESDM Report* and each updated version;
 - b. a copy of each version of the *Acoustic Assessment Report*;
 - c. a copy of each version of the *Stormwater Management Report*;
 - d. a copy of each version of the *Design and Operation Report*;
 - e. supporting information used in the emission rate calculations performed in the *ESDM Reports*, *Acoustic Assessment Reports* and the *Design and Operation Reports*;
 - f. a report prepared annually that keeps records of:
 - i. any shipments of waste received at the *Facility*, including the type and amount of waste received;
 - ii. any shipments of off-site generated waste from the *Facility*, including the type and amount of waste being shipped and the destination of the waste (for clarity, when the shipment includes mixed waste described in Section E3 below, the record shall indicate that the shipment includes mixed waste and the amount shall be recorded as the weight and/or volume of the entire mixed load);
 - iii. any complaints regarding transportation or storage of off-site

- generated waste, including a description of the complaint and the actions taken to resolve the complaint; and
- iv. details of any spills of off-site generated waste during transportation or storage, including a description of the spill and the actions taken to address the spill and/or a copy of any incident report generated by the waste carrier;
 - v. any environmental and operational problems, that are likely to negatively impact the environment, encountered during the operation of the *Facility* and during the facility inspections and any mitigative actions taken; and
 - vi. any recommendations to minimize environmental impacts from the operation of the *Facility* and to improve *Facility* operations and monitoring programs in this regard.
- g. the records in the *Log*;
- h. copies of each *Annual Modification Summary* prepared under Condition 5.1 of this *Approval*; and
- i. all records related to environmental complaints made by the public as required by Condition 7 of this *Approval*.
3. Unless otherwise specified in this *Approval*, the *Company* shall retain, for a minimum of three (3) years from the date of their creation all reports, records and information described in this *Approval*, including:
- a. records of maintenance, repair and inspection of *Equipment* related to all *Processes with Significant Environmental Aspects, Works and Waste Management*; and
 - b. a copy of each version of the spill procedures.

9. ACOUSTIC AUDIT

1. The *Company* shall carry out *Acoustic Audit* measurements on the actual noise emissions due to the operation of the *Facility*. The *Company*:
 - a. shall carry out *Acoustic Audit* measurements in accordance with the procedures in *Publication NPC-103*; and
 - b. shall submit an *Acoustic Audit Report* on the results of the *Acoustic Audit*, prepared by an *Independent Acoustical Consultant*, in accordance with the requirements of *Publication NPC-233*, to the *District Manager* and the *Director*, not later than twelve (12) months after the full implementation of the *Noise Control Measures* outlined in Appendix E of the *Acoustic Assessment Report*.
2. The *Director*:

- a. may not accept the results of the *Acoustic Audit* if the requirements of *Publication NPC-233* were not followed; and
- b. may require the *Company* to repeat the *Acoustic Audit* if the results of the *Acoustic Audit* are found unacceptable to the *Director*.

10. **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 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;
 - 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*.

Schedule A - Supporting Documentation

1. Environmental Compliance Approval Application, dated July 19, 2024, signed by David Bellaire and submitted by the FCA Canada Inc.
2. Emission Summary and Dispersion Modelling Report, prepared by RWDI AIR Inc. and dated July 11, 2024.
3. Guidance Document for Determination of Significant Sources in an Automotive Assembly Facility, prepared by the Auto Manufacturers in Ontario with the Support of the CVMA, revised draft dated June 2007.
4. Acoustic Assessment Report prepared by RWDI AIR Inc., dated June 18, 2024 and signed by Slavi Grozev.
5. Design and Operation Report submitted by the *Company* titled "FCA

Canada Inc., Waste Transfer and Processing Environmental Compliance Approval (ECA)" Version 2.0, dated August 7, 2025, and prepared by Alexander Ramessar, FCA Canada Inc, including all supporting documentation and amending documents, describing the design and operation of the Waste Management System.

6. Email dated February 12, 2025, from Brad Bergeron, ASCT, RWDI, to Emma Gallop, MECP, with additional information on dewatering and outdoor waste storage.
7. Stormwater Management Report entitled "FCA Canada Inc. - Stormwater Management Analysis Report - Windsor Assembly Plant" dated June 2024 and prepared by Dillon Consulting Limited.
8. Email and attachment dated March 13, 2025 from Cooper Cecile, Environmental Specialist of FCA Canada Inc. to Nancy He, P.Eng. MECP, with comments on draft ECA.
9. Email and attached dated April 15, 2025 from Taryn Azzopardi, Associate, Dillon Consulting Limited to Nancy He, P.Eng., MECP, with comments on draft ECA.

Schedule B — Air Emissions

B1 MODIFICATION TO POINT OF IMPINGEMENT

1. Prior to making a *Modification* to the *Facility* that affects the discharge of a *Compound of Concern* to the air, 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 B1.2 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. The *Company* shall submit a request required by Condition B1.2, 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 B1.2 in respect of a proposed *Modification* described in Condition B1.1, the *Company* shall not make the *Modification* mentioned in Condition B1.1 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 B1.6 shall be deemed a new submission under Condition B1.2.
8. If the *Director* approves the request, the *Company* shall update the *ESDM Report* to reflect the *Modification*.
9. Condition B1 does not apply if Condition 2.1 has expired.

Schedule C — RTO Temperature Monitoring

PARAMETER:

Temperature

LOCATION:

The continuous temperature monitor shall be installed at an accessible location where the measurements are representative of the actual operating temperatures of the *RTO* and are used to verify compliance of this *Approval*.

PERFORMANCE:

The continuous temperature monitor shall meet the following minimum performance specifications for the following parameters.

PARAMETERS	SPECIFICATION
	Thermal Oxidizer
1. Type:	shielded "K" type thermocouple, or equivalent
2. Accuracy:	± 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 minute or better.

RELIABILITY:

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

Schedule D – Sewage Works

D1 APPROVED WORKS

Sewage *Works* for the collection, transmission, treatment and disposal of stormwater servicing the *Facility* including:

- one (1) sewage collection and conveyance system - West Roadway Storm Sewer (WRSS) System, receiving stormwater runoff from a drainage area of 15.6 hectares (ha) with an imperviousness rate of 44.5%, discharging via a storm outfall OF2 to the Grand Marais Drain;
- one (1) sewage collection and conveyance system - Process Line and Wastewater Treatment Plant (WWTP) Storm Sewer System, receiving stormwater runoff from a drainage area of 9.01 ha with an imperviousness rate of 43.5%, which is treated by the WWTP serving this site and then discharges to the municipal sanitary sewer. An emergency sluice gate is located upstream of the WWTP inlet on the north band of the Grand Marais Drain (ref: OF3). This gate is closed and is only operated under emergency conditions when the WWTP surge storage is overwhelmed;
- one (1) sewage collection and conveyance system - East Roadway Storm Sewer (ERSS) System, receiving stormwater runoff from a

drainage area of 19.71 ha with an imperviousness rate of 22.5%, discharging via a storm outfall OF4 to the Grand Marais Drain;

- one (1) sewage collection and conveyance system - Chrysler Centre Storm Sewer System, receiving stormwater runoff from a drainage area of 15.46 ha with an imperviousness rate of 68.5%, discharging via a storm outfall OF5 to the Grand Marais Drain;
- one (1) sewage collection and conveyance system - Walker Road Storm Sewer System, receiving stormwater runoff from a drainage area of 25.6 ha with an imperviousness rate of 65.1%, discharging via a storm outfall OF6 to the municipal sewage system along Walker Road;
- one (1) sewage collection and conveyance system - Tecumseh Road Storm Sewer System, receiving stormwater runoff from a drainage area of 1.36 ha with an imperviousness rate of 95.5%, discharging via a storm outfall OF7 to the municipal sewage system along Tecumseh Road;
- one (1) sewage collection and conveyance system - Grand Marais Drain Storm Sewer System, receiving stormwater runoff from a drainage area of 0.38 ha with an imperviousness rate of 100%, discharging via a storm outfall OF1 to the Grand Marais Drain;
- two (2) oil/grit separators, each located at a truck loading dock A or B;
- activities such as changing, removing, and/or adding of culverts; addition/elimination of catch basins, swale and ditch creation and alterations, are permitted as long as it does not impact total volumes/quality of water collected from the approved drainage areas and it does not constitute a risk for the environment; and
- if required, any water that has been treated on-site by a licensed contractor that meets provincial requirements and hold a ministry approved mobile sewage works Environmental Compliance Approval, can be discharged to the *Works* provided the water quality meets effluent limits imposed in the said approved mobile sewage works Environmental Compliance Approval.

All in accordance with the submitted supporting documents listed as items 7, 8, and 9 in Schedule A – Supporting Documentation.

D2 WORKS OPERATION AND MAINTENANCE

D2.1 The *Company* shall ensure that any person authorized to carry out work on or operate any aspect of the *Works* is notified of this *Approval* and the conditions herein and shall take all reasonable measures to ensure any such person complies with the same.

D2.2 The *Company* shall inspect the *Works* at least once a year and, if necessary, clean and maintain the *Works* to prevent the excessive build-up of sediments and/or vegetation.

D2.3 The *Company* shall design and undertake everything practicable to operate the *Works* in accordance with the objectives listed in the following Effluent Objective Table for the final effluent discharging into the Grand Marais Drain.

Effluent Objective Table

Effluent Parameter	Averaging Calculator	Concentration Objective (maximum unless otherwise indicated)
Total Suspended Solids	Single Sample Result*	25 mg/L **
Oil and Grease	Single Sample Result	15 mg/L
pH	Single Sample Result	6.0 - 9.0 inclusive

Note * : Single Sample Result means the test result of a parameter in the effluent discharged on any day, as measured by a probe, analyzer or in a composite or grab sample, as required.

Note **: mg/L means milligrams per litre.

D2.4 The *Company* shall ensure the immediate clean-out of the *Works* after a fuel or oil spill capture.

D2.5 The *Company* shall ensure that equipment and material for the containment, clean-up and disposal of fuel and oil and materials contaminated with such, is on hand and in good repair for immediate use in the event of:

- a. loss of fuel or oil to *the Works*; or
- b. a spill within the meaning of Part X of *the EPA*.

D3 WORKS MONITORING

D3.1 The *Company* shall carry out a scheduled monitoring program of collecting samples at the required sampling points, at the frequency specified or higher, by means of the specified sample type and analyzed for each parameter, as outlined in the following Final Effluent Monitoring Table, and record all results.

Final Effluent Monitoring Table

Sampling location	Three (3) sampling points, each at one of the following storm outfalls, prior to discharging into Grand Marais Drain: <ul style="list-style-type: none"> • OF2 - West Roadway Storm Sewer (WRSS) System; • OF4 - East Roadway Storm Sewer (ERSS) System; and • OF5 - Chrysler Centre Storm Sewer System.
Sampling Frequency	Quarterly (four (4) times per year), with no two samples taken within thirty (30) days of one another.
Sampling Type	Grab (during or after relatively small rainfall events, with total rainfall depths between 5 mm and 32 mm)
Sampling Parameters	Total Suspended Solid (TSS), Oil and Grease, pH (field), and Total petroleum hydrocarbons (TPH)*

Note *: TPH sampling shall be added to Quarterly sampling for a catchment area where bulk underground fuel storage occurs; and should once discreet sample result is greater than 300 milligrams per litre (mg/L), or three (3) consecutive sample results each is greater than 100 mg/L, the *Company* shall, within one (1) month after receiving the sample result, submit an investigation report to the District Manager for potential causes, and, if necessary, mitigation measures along with a schedule of implementation.

D3.2 The *Company* may request the sampling locations, measurement frequency or parameters be reviewed and revised after two (2) years of monitoring in accordance with this Condition D3, subject to written concurrence from the *District Manager*.

D3.3 The methods and protocols for sampling, analysis and recording shall conform, in order of precedence, to the methods and protocols specified in the following documents and all analysis shall be conducted by a laboratory accredited to the ISO/IEC:17025 standard:

- a. the Ministry's publication "Protocol for the Sampling and Analysis of Industrial/Municipal Wastewater Version 2.0" (January 2016), PIBS 2724e02, as amended; and
- b. the publication "Standard Methods for the Examination of Water and Wastewater", as amended.

D4 SPILL PROCEDURES

D4.1 The *Company* shall, not later than 120 days after the date of this *Approval*

implement spill procedures in accordance with the *Environmental Management System*.

D4.2 The *Environmental Management System* shall include a set of procedures describing how to mitigate the impacts of a spill at the *Facility* and within the area serviced by the *Works* and the *Waste Management System* and shall, as a minimum, include the following:

- a. the name, job title and location (address) of the *Company*, person in charge, management or person(s) in control of the facility;
- b. the name, job title and 24-hour telephone number of the person(s) responsible for activating the spill procedures;
- c. a site plan drawn to scale showing the *Facility*, nearby buildings, streets, catch-basins & manholes, drainage patterns (including direction(s) of flow in storm sewers), any receiving body(ies) of water that could potentially be significantly impacted by a spill and any features which need to be taken into account in terms of potential impacts on access and response (including physical obstructions and location of response and clean-up equipment);
- d. steps to be taken to report, contain, clean up and dispose of contaminants following a spill;
- e. a listing of telephone numbers for: local clean-up company(ies) who may be called upon to assist in responding to spills; local emergency responders including health institution(s); and *Ministry Spills Action Centre* 1-800-268-6060;
- f. access to Safety Data Sheets for each hazardous material which may be transported or stored within the area serviced by the *Works* or at the *Facility*;
- g. the means (internal corporate procedures) by which the spill procedures are activated;
- h. a description of the spill response training provided to employees assigned to work in the area serviced by the *Works*, or those are engaged with the *Waste Management*

System the date(s) on which the training was provided and by whom;

- i. an inventory of response and clean-up equipment available to implement the spill procedures, location and, date of maintenance/replacement if warranted; and
- j. the date on which the spill procedures were prepared and subsequently, amended.

D4.3 The *Environmental Management System* spill procedures shall be kept in a readily accessible location on-site.

D4.4 The *Environmental Management System* spill procedures shall be amended to reflect any *Modifications* to the *Works*, *Waste Management System* or the *Facility*.

D5 SALT MANAGEMENT PLAN

D5.1 The *Company* shall provide a Salt Management Plan for the *Facility* to the *District Manager* within three (3) months of the issuance of this *Approval*.

D6 REPORTING

D6.1 The *Company* shall prepare a monitoring report on a calendar year basis and submit to the District Manager in an electronic format by **March 31** of the calendar year following the period being reported upon. The reports shall contain, but shall not be limited to, the following information pertaining to the reporting period:

- a. a summary and interpretation of all final effluent monitoring data, including a comparison to the effluent objectives in section D2.3 of Schedule D in this *Approval*, and a description of efforts made and results achieved in meeting the effluent objectives;
- b. an investigation report for Total Petroleum Hydrocarbons (TPH) sampling result, if any;
- c. a summary of all operating issues encountered and corrective actions taken;

- d. a summary of any effluent quality assurance or control measures undertaken;
- e. a summary of any complaints received and any steps taken to address the complaints; and
- f. any other information the *District Manager* requires from time to time.

Schedule E – Waste Management Approved Waste Management Activities

E1 GENERAL

1. Approval is hereby granted for the following waste management activities, subject to the Conditions set out in this *Approval*:
 - a. the transportation of waste from the *FCA Canada Inc. Wastewater Treatment Plant* and *FCA Canada Inc. Research and Development CTR* to the *Facility* (i.e., the FCA Canada Inc. Windsor Assembly Plant facility located at 2199 Chrysler Center in Windsor, Ontario, as defined above);
 - b. the storage of this waste at the *Facility*; and
 - c. the processing of this waste at the *Facility*, limited as per the Conditions set out in this *Approval*.
2. No wastes other than the following shall be transported, stored, or processed pursuant to this *Approval*:
 - a. solid non-hazardous waste generated through manufacturing and facility maintenance activities taking place at *FCA Canada Inc. Wastewater Treatment Plant* and *FCA Canada Inc. Research and Development CTR*, not including putrescible waste;
 - b. *Subject Waste* generated at *FCA Canada Inc. Wastewater Treatment Plant* and *FCA Canada Inc. Research and Development CTR*, limited to the following:
 - i. Non-hazardous liquid industrial wastes having Waste Class Nos. 133, 145, 146, 148, 212, 213, 221, 232, 233, 251-253, 262, 263, 265, 268, and 331;
 - ii. Hazardous wastes that are leachate toxic having Waste Class Nos. 145, 146, 148, 211-213, 221, 251, 263, and 265;

- iii. Hazardous wastes that are ignitable having Waste Class Nos. 145, 148, 211-213, 221, 222, 265, 268, and 331;
 - iv. Hazardous wastes that are corrosive having Waste Class Nos. 112-114, 121, 122, 148, 262, 267, and 268;
 - v. Hazardous wastes that are hazardous industrial wastes having Waste Class Nos. 131, 145, 148, 211, 212, and 265;
 - vi. Hazardous wastes that are hazardous waste chemicals having Waste Class Nos. 131, 145, 148, 211, 212, 263, and 265; and
 - vii. Hazardous wastes that are acute hazardous wastes having Waste Class Nos. 148, 261, and 263.
- 3. The total amount of waste received at the *Facility*, pursuant to this *Approval* and per condition E1.1, shall not exceed 10 tonnes per day.
 - 4. The *Company* shall ensure all incoming loads are inspected by trained personnel to ensure only approved waste is received.
 - 5. The Conditions of this *Approval* do not apply to the management of waste that is generated on-site and carried out in accordance with Section 17.1 of *Regulation 347*.
 - 6. Notwithstanding Condition E1.3 above, the requirements set out in paragraphs 2, 3, 4, 5, 6, 7 and 8 of Section 17.2 of *Regulation 347* do not apply to *Subject Wastes* generated at the *Facility*.

E2 WASTE TRANSPORTATION

- 1. The *Company* may transport waste pursuant to this *Approval* using a third-party. When waste is transported by a third-party, the *Company* shall request proof from the third-party that the third-party has a valid environmental compliance approval, EASR registration or other permission that authorizes the transportation of the waste in Ontario, or that the third-party is operating in accordance with a valid regulatory exemption that allows the transportation of the waste in Ontario, prior to the third-party receiving the waste.
- 2. The *Company* shall make all reasonable efforts to ensure, when waste is being transported, that all such vehicles transporting waste pursuant to this *Approval*, per condition E1.1.a, have either a paper or electronic copy of this *Approval* on-board at the time of transport, so that either the driver or the *Company* is able to make a copy of this *Approval*

available to any Provincial Officer immediately upon request.

3. The *Company* shall ensure that every vehicle used to transport waste pursuant to this *Approval*, per condition E1.1.a, conforms to paragraphs 1, 2, 3, 4, 5, 5.1 and 8 of Section 16(1) of *Regulation 347*, and that driver training for every driver operating a vehicle used to transport waste conforms to paragraph 9 of Section 16(1) of *Regulation 347*.
4. The *Company* shall ensure that every vehicle used for transporting waste pursuant to this *Approval*, per condition E1.1.a, shall be insured under an insurance policy under which the minimum coverage is \$2,000,000 and that includes coverage for liability resulting from spills from that vehicle.
5. If the *Company* receives a complaint with respect to the transportation of waste and the complaint is related to the natural environment, the *District Manager* of the *Ministry* for the district in which the events leading to the complaint are alleged to have occurred shall be notified of the complaint no later than two business days after the complaint is received.
6. Spill response for spills during transportation shall be carried out in accordance with Part X of the *EPA*, and otherwise in accordance with the transport company's spill procedures.

E3 WASTE STORAGE

1. All waste generated off-site shall be stored in a manner such that it is easily distinguishable from wastes generated on-site. Wastes generated off-site that have been mixed with wastes generated on-site in a manner shall be marked as containing off-site generated waste, and the entire weight and/or volume of the comingled waste shall be counted towards any storage limits set out in this *Approval*.
2. All waste storage containers shall have a label or sign identifying the waste type and, when applicable, the WHMIS and/or TDGA classification of the contents contained within. The label or sign shall be clearly visible for inspection and record keeping.
3. All waste stored pursuant to this *Approval* and per condition E1.1 shall be stored under the canopy and/or roof in the Waste Accumulation Area described in Item 5 in Schedule A - Supporting Documentation, and in a manner that prevents contact with stormwater or the

generation of wind-blown litter.

4. Notwithstanding condition E3.3 above, solid non-hazardous waste generated off-site may be stored outdoors in covered containers in a manner that prevents contact with stormwater or the generation of wind-blown litter.
5. Notwithstanding condition E3.3 above, PHEV batteries may be stored outdoors, in a manner that prevents contact with stormwater, and in accordance with Item 6 in Schedule A - Supporting Documentation.
6. The total amount of waste stored at the *Facility* at any one time, pursuant to this *Approval* and per condition E1.1, shall not exceed 150 tonnes.
7. All *Subject Waste* shall be stored in a manner consistent with the *Ministry* document entitled “Guidelines for Environmental Protection Measures at Chemical and Waste Storage Facilities” dated May 2007, and specifically in accordance with the following:
 - a. All *Subject Waste* that is liquid shall be stored in an area with secondary containment sufficient to hold the greater of:
 - i. 10% of the volume of the largest container; or
 - ii. 100% of the volume of the largest container and 10% of the aggregate volume of the remaining containers.
 - b. The secondary containment system shall be constructed, coated, or lined to present a permeability rate of 1×10^{-6} cm/sec or less to the wastes being stored, and shall maintained in a good state of repair to ensure the permeability rate continues to be met.
 - c. Only those wastes that are chemically compatible as per Appendix C of the “Guidelines for Environmental Protection Measures at Chemical and Waste Storage Facilities”, shall be stored in the same secondary containment area, unless the wastes are stored in separate over-packs or other containers that will prevent the co-mingling of the wastes in the event of a spill.
 - d. The *Company* shall ensure there is adequate separation distance between incompatible waste groups, as per Appendix C of the “Guidelines for Environmental Protection Measures at Chemical and Waste Storage Facilities”, to prevent chemical interaction.
8. All *Subject Waste* shall be stored, handled, and maintained so as to prevent leaks or spills of the waste, or damage to or deterioration of

the container in which the waste is stored. The *Company* shall immediately remove from service any leaking or damaged container.

9. Batteries shall be stored separately by type (i.e., lithium batteries stored separately from nickel-cadmium batteries etc.), with terminal ends sealed/protected in manner which prevents spontaneous ignition of stored batteries, and provided with sufficient spill containment to ensure against leakage or spilled battery acid.
10. Fluorescent tubes shall be stored in a secure manner that prevents breakage.
11. Containers and storage areas containing flammable and/or ignitable materials shall be adequately grounded and/or protected from static electric charges, as required.
12. The valve for the drain serving the Waste Accumulation Area shall be placed in the closed position during the shipment of waste into or out of the area, and when waste is being handled or processed within that area.
13. All secondary spill containment areas shall be maintained in good condition and free of cracks.
14. Spills response for spills at the *Facility* shall be carried out in accordance with Part X of the *EPA*, and in accordance with the spill procedures in the *Company's Incident Management System*.

E4. WASTE PROCESSING

1. The following waste processing activities may be carried out on wastes generated off-site:
 - a. The receiving, temporary storage, and transfer of waste.
 - b. The bulking of liquid wastes.
 - c. The shredding of solid non-hazardous wastes.
 - d. Crushing of empty, non-hazardous drums.
2. The bulking of liquid wastes shall be carried out in the following manner:
 - a. Only wastes with the same physical state, Waste Class, Waste Characterization, and treatment or disposal method, shall be bulked together.
 - b. Wastes that exhibit characteristics of chemical change upon

bench-scale mixing, such as a change in colour, the formation of a precipitate, the formation of a gas, a change in odour, or a change in temperature, shall not be mixed together.

- c. The bulking of liquid wastes shall only take place under the roof and/or canopy in the Waste Accumulation Area described in Item 5 in Schedule A - Supporting Documentation.
 - d. All bulking shall be carried out using appropriate equipment, such as barrel movers, and in a manner that prevents spills. Any spilled material shall be cleaned up immediately and sent off-site for disposal as soon as practicable.
3. The shredding of solid non-hazardous waste shall be carried out in the following manner:
- a. The shredding of solid non-hazardous waste shall be carried out using an industrial recycling shredder as described in Item 5 in Schedule A - Supporting Documentation.
 - b. The shredding of solid non-hazardous waste shall only take place under the roof and/or canopy in the Waste Accumulation Area described in Item 5 in Schedule A - Supporting Documentation.
4. Drum crushing shall be carried out in accordance with the following:
- a. Drums shall be crushed in accordance with Item 5 in Schedule A – Supporting Documentation.
 - b. The shredding of solid non-hazardous waste shall only take place under the roof and/or canopy in the Waste Accumulation Area described in Item 5 in Schedule A - Supporting Documentation.
 - c. Drums shall meet the requirement of an *Empty Container* prior to crushing; and
 - d. Drums that contain or previously contained Hazardous Waste shall be prohibited from being crushed or shredded at the Site.

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

1. **GENERAL**

Condition 1 is included to require the *Approval* holder to build, operate and maintain the *Facility* in accordance with the supporting documentation in Schedule

A - Supporting Documentation considered by the *Director* in issuing this *Approval*.

2. LIMITED OPERATIONAL FLEXIBILITY AND PERFORMANCE LIMITS

Conditions 2 and 3 are included to limit and define the *Modifications* permitted by this *Approval*. 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*.

3. DOCUMENTATION REQUIREMENTS

Condition 4 is included to require the *Company* to maintain ongoing documentation that demonstrates compliance with the performance limits as specified in Condition 3 of this *Approval* and allows the *Ministry* to monitor on-going compliance with these performance limits.

4. REPORTING REQUIREMENTS

Condition 5 is included to require the *Company* to prepare a yearly *Annual Modification Summary*, to assist the *Ministry* with the review of compliance with the *EPA*, *OWRA*, the regulations made under those statutes and this *Approval*.

5. OPERATING PROCEDURES AND MAINTENANCE PROGRAMS

Condition 6 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 7 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 8 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 3 of this *Approval* is necessary.

8. ACOUSTIC AUDIT

Condition 9 is included to require the *Company* to gather accurate information and submit an Acoustic Audit Report in accordance with procedures set in the *Ministry's* noise guidelines, so that the environmental impact and subsequent compliance with this *Approval* can be verified.

9. CHANGE OF OWNERSHIP

Condition 10 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). 2935-9SSSSB issued on February 19, 2015.

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 24th day of August,
2025

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

AH/
c: Area Manager, MECP Windsor
c: District Manager, MECP Sarnia
Brad Bergeron, RWDI AIR Inc.