

ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 0602-DJKFX Y

Issue Date: September 11, 2025

GFL Renewables Inc.
100 New Park Place, No. 500
Vaughan, Ontario
L4K 0H9

Site Location: Eastern Ontario Waste Handling Facility
17125 Laflèche Road
North Stormont Township, United Counties of Stormont,
Dundas and Glengarry
K0C 1W0

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:

- one (1) candlestick open flame flare system serving the renewable natural gas plant, used for combusting off-specification landfill gas, operating at a maximum inlet gas flow rate of 1.89 cubic metres per second, discharging to the air through a stack with exit diameter of 0.2 metre, and extending 12.19 metres above grade;
- one (1) thermal oxidizer serving the renewable natural gas plant, operating at a maximum waste gas flow rate of 2.10 cubic metres per second, discharging to the air through a stack with an exit diameter of 1.93 metres, and extending 15.24 metres above grade.

all in accordance with the application for an Approval submitted by GFL Renewables Inc., dated May 9, 2025 and signed by Jennifer Ahluwalia, and the supporting information including:

- the Emission Summary and Dispersion Modelling Report, submitted by Dillon Consulting Limited, dated May 9, 2025 and signed by Robert Morgan and Greg van Loenen;
- the additional air information submitted by Dillon Consulting Limited by email dated August 7;
- the addendum to the Emission Summary and Dispersion Modelling Report submitted by Dillon Consulting Limited by email dated August 8, 2025;
- the addendum to the Emission Summary and Dispersion Modelling Report submitted by Dillon Consulting Limited by email dated September 5, 2025 including the updated Emission Summary Table, and
- the Acoustic Assessment Report prepared by Dillon Consulting Limited, dated August, 2025 and signed by James Wang and Amir A. Irvani.

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. "Best Management Practices Plan for Fugitive Dust" means a document or a set of documents which describe measures to minimize dust emissions from the Facility and/or Equipment;
3. "Best Management Practices Plan for Odour" means a document or a set of documents with practices or procedures intended to prevent or minimize odour emissions from the Facility and/or Equipment;
4. "Company" means GFL Renewables 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;
5. "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;
6. "District Manager" means the District Manager of the appropriate local district office of the Ministry, where the Facility is geographically located;
7. "EPA" means the *Environmental Protection Act*, R.S.O. 1990, c.E.19;
8. "Equipment" means the flare, thermal oxidizer and ancillary 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;
9. "Facility" means the entire operation located on the property where the Equipment is located;
10. "Manual" means a document or a set of documents that provide written instructions to staff of the Company;
11. "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
12. "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 from the date of commencement of operation of the Equipment, 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. dates and times when the flare and thermal oxidizer are operated, and their operational details;
 - iii. procedures to monitor and record the quality, for example methane content, and the quantity of landfill gas delivered to the renewable natural gas plant for processing;
 - iv. procedures to monitor and record the flow rate of the waste gases to the thermal oxidizer, and flow rate of the off-specification landfill gas to the flare;
 - v. emergency procedures, including spill clean-up procedures and procedures to prevent upset conditions;
 - vi. procedures for the operation of the flare and thermal oxidizer such that a destruction efficiency of a minimum 98 percent of the gases vented to the flare and thermal oxidizer is achieved;
 - vii. procedures for any record keeping activities relating to operation and maintenance of the Equipment;
 - viii. all appropriate measures to minimize noise, dust and odorous emissions from all potential sources; and
 - ix. the frequency and procedures for inspection, calibration and performance evaluation of the continuous monitoring devices.
 - b. implement the recommendations of the Manual.
 - c. The Company shall ensure that any person authorized to carry out work on or operate any aspect of the Equipment/Facility is provided with a copy of this Approval and the conditions herein and shall take all reasonable measures to ensure any such person complies with same.
 - d. The Company shall notify the District Manager in writing of the date of commencement of

operation of the Equipment within two (2) weeks of the commencement of operation.

2. FLARE OPERATIONS

1. The Company shall ensure that the flare is operated to comply at all times with the following requirements:
 - a. the flare shall be operated in a manner such that the destruction efficiency of a minimum 98 percent of the gases vented to the flare is achieved through procedures including but not limited to maintaining a net heating value of the gases vented to the flare of a minimum of 10 megajoules per cubic metre and demonstrating the presence of a flame at all times when gas is vented through the flare;
 - b. a pilot flame must be present at all times when gas is vented through the flare. The presence of the pilot flame shall be continuously monitored and shall be equipped with a continuous monitoring system equipped with a continuous recorder and alarm to detect and alert personnel of a loss of the pilot flame. The time, date and duration of any loss of pilot flame shall be recorded at all times when gas is vented through the flare. The continuous monitoring system shall be operated, maintained and calibrated in accordance with the manufacturer specifications; and
 - c. the flare shall be operated with no visible emissions except a period not to exceed a total of five minutes during any two consecutive hours.

3. THERMAL OXIDIZER OPERATIONS

1. The Company shall ensure that the thermal oxidizer is operated to comply at all times with the following requirements:
 - a. the thermal oxidizer shall be operated in a manner such that a destruction efficiency of a minimum 98 percent of the gases vented to the thermal oxidizer is achieved;
 - b. waste gases shall not be directed to the thermal oxidizer until the combustion chamber has achieved a minimum temperature of 760 degrees Celsius, as measured by a continuous temperature monitoring and recording system;
 - c. a minimum operating temperature of 760 degrees Celsius shall be maintained in the thermal oxidizer combustion chamber, at a point representing a minimum 0.6 second residence time, at all times when the thermal oxidizer is in operation and a waste gas stream is directed to the thermal oxidizer for destruction; and
 - d. the temperature in the combustion chamber of the thermal oxidizer shall be continuously monitored and recorded when the oxidizer is in operation. The continuous temperature monitor and recording system shall comply with the requirements listed in Schedule A.

4. BEST MANAGEMENT PRACTICES PLAN FOR ODOUR

1. The Company shall prepare and submit to the District Manager, not later than six (6) months from the date of this Approval, a Best Management Practices Plan for Odour for all sources of odour located at the Eastern Ontario Waste Handling Facility.
2. The Best Management Practices Plan for Odour, at a minimum, shall be prepared in accordance with the Ministry Technical Bulletin: Best Management Practices for Industrial Sources of Odour, available on the Ministry website.
3. The Company shall finalize the Best Management Practices Plan for Odour in consultation with the District Manager. If the Best Management Practices Plan for Odour is not acceptable to the District Manager, a revised ambient air monitoring program shall be submitted to the District Manager within a period agreed to in writing with the District Manager.
4. Upon acceptance of the Best Management Practices Plan for Odour by the District Manager, the Company shall immediately implement the Best Management Practices Plan for Odour.
5. The Company shall review and update as necessary the Best Management Practices Plan for Odour on an annual basis or at the direction of the District Manager.
6. The Company shall ensure that the most recent version of the Best Management Practices Plan for Odour is available at the Facility and is implemented in accordance with its contents.

5. BEST MANAGEMENT PRACTICES PLAN FOR FUGITIVE DUST

1. The Company shall prepare and submit to the District Manager, not later than six (6) months from the date of this Approval, a Best Management Practices Plan for Fugitive Dust for all sources of fugitive dust located at the Eastern Ontario Waste Handling Facility.
2. The Best Management Practices Plan for Fugitive Dust shall be prepared in accordance with the Ministry Technical Bulletin: Management Approaches for Industrial Fugitive Dust Sources, March 8, 2017, as amended, and available on the Ministry website.
3. The Company shall finalize the Best Management Practices Plan for Fugitive Dust in consultation with the District Manager. If the Best Management Practices Plan for Fugitive Dust is not acceptable to the District Manager, a revised Best Management Practices Plan for Fugitive Dust shall be submitted to the District Manager within a period agreed to in writing with the District Manager.
4. Upon acceptance of the Best Management Practices Plan for Fugitive Dust by the District Manager, the Company shall immediately implement the Best Management Practices Plan for Fugitive Dust.
5. The Company shall review and update as necessary the Best Management Practices Plan for

Fugitive Dust on an annual basis or at the direction of the District Manager.

6. The Company shall ensure that the most recent version of the Best Management Practices Plan for Fugitive Dust is available at the Facility and is implemented in accordance with its contents.

6. 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;
 - b. all records related to the operation, maintenance and continuous monitoring of the flare and thermal oxidizer required under Conditions 2 and 3 of this Approval;
 - c. all records related to odour control required under Condition 4 of this Approval;
 - d. all records related to fugitive dust control required under Condition 5 of this approval; and
 - e. all records of any environmental complaints required under Condition 7 of this Approval

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 seven (7) 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.

8. NOISE

1. The Company shall, at all times, ensure that the noise emissions from the Equipment comply with the limits set out in Ministry Publication NPC-300.

9. 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. Conditions No. 1, 4 and 5 are 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. Conditions No. 2, 3 and 8 are included to provide the minimum performance requirements considered necessary to prevent an adverse effect resulting from the operation of the Equipment.
3. Condition No. 6 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.
4. Condition No. 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.
5. Condition No. 9 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.

SCHEDULE A

CONTINUOUS TEMPERATURE MONITORING SYSTEM REQUIREMENTS - THERMAL OXIDIZER

PARAMETER:

Temperature

LOCATION:

The sample point for the continuous temperature monitor shall be located in the combustion zone of the thermal oxidizer, at a point representative of a minimum temperature of 760 degrees Celsius at a minimum retention time of 0.6 second.

PERFORMANCE:

The Continuous Temperature Monitor shall meet the following minimum performance specifications for the following parameters

PARAMETERS	SPECIFICATION
Type	shielded "K" type thermocouple, or equivalent
Accuracy	± 1.5 percent of the minimum gas temperature
Calibration	Per manufacturer's recommendations

DATA RECORDER:

The 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 time for each calendar quarter, when the thermal oxidizer is in operation.

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.

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 11th day of September, 2025



Nancy E Orpana, P.Eng.

Director

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

SA/

c: Area Manager, MECP Cornwall

c: District Manager, MECP Ottawa

Robert Morgan, Dillon Consulting Limited