

AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 6697-DGCL2G

Issue Date: September 9, 2025

2270386 Ontario Limited
162 Cumberland Street
Toronto, Ontario
M5R 3N5

Site Location: Brooks Road Landfill Site

160 Brooks Road, North Cayuga, Haldimand County, Ontario.

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) landfill site, having a capacity of 1,264,465 cubic metres (including waste and daily cover), a maximum fill rate of 250,000 tonnes per year and 1,000 tonnes per day;
- one (1) leachate treatment system, having a rated capacity of 200 cubic metres per day, complete with two (2) leachate collection sumps (stage 1 and stage 9), a raw leachate primary settling tank, an aeration system and above-grade treated effluent storage tanks;

all in accordance with the supporting information listed in Schedule A.

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

1. "Acoustic Assessment Report" means the report, prepared in accordance with Publication NPC-233 submitted in support of the application, that documents all sources of noise emissions and Noise Control Measures present at the Facility. "Acoustic Assessment Report" also means the Acoustic Assessment Report prepared by GHD, dated February 28, 2024 and signed by Michael Masschaele;
2. "Approval" means this Environmental Compliance Approval, including the application and supporting documentation listed above;
3. "Company" means 2270386 Ontario Limited, that is responsible for the construction or operation of the Facility and includes any successors and assigns;
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, as amended;
6. "Equipment" means all 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. "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 GHD and dated March 18, 2024, submitted in support of the application, and includes any changes to the report made up to the date of issuance of this Approval;
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;
11. "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;
12. "Noise Guidelines for Landfill Sites" means the Ministry draft publication "Noise Guidelines for Landfill Sites", October 1998, as amended;
13. "Odour Management Plan" means the Odour Management Plan, Brooks Road Landfill Site, Haldimand County, prepared by GHD, dated March 18, 2024, that includes mitigation measures to minimize off-Site odour impacts, and if appropriate, a trigger mechanism and contingency plan;
14. "Publication NPC-233" means the Ministry Publication NPC-233, "Information to be Submitted for Approval of Stationary Sources of Sound", October, 1995, as amended;
15. "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;
16. "Site" means the entire waste disposal site, including the buffer lands, at the Brooks Road Landfill Site, Lot 24, Concession 1 North, Haldimand County; and
17. "Truck(s)" means trucks carrying waste for disposal at the Facility.

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 prepare, not later than three (3) months from the date of this Approval, implement and continue to update as necessary, a Manual outlining the operating procedures and maintenance programs for the Equipment/Facility, which shall specify as a minimum:
 - a. routine operating and maintenance procedures in accordance with good engineering practices;
 - b. emergency procedures;
 - c. frequency of inspections and scheduled preventative maintenance;
 - d. procedures to prevent upset conditions;
 - e. all appropriate measures to prevent/minimize fugitive particulate matter, noise and odorous emissions from all potential sources at the Site; and
 - f. procedures for record keeping activities relating to the operation and maintenance programs.
2. The Company shall ensure that the Facility/Equipment is properly operated and maintained at all times and in accordance with this Approval, the operating procedures and maintenance Manual, and the Odour Management Plan.

2. ODOUR MANAGEMENT PLAN

1. The Company shall forthwith implement the Odour Management Plan and continue to review and update as necessary and in consultation with the District Manager as applicable.
2. If there is any odour complaint, or significant odour is detected during daily inspection, and the odour is confirmed to originate from the Site, mitigation measures shall be implemented immediately in accordance with the Odour Management Plan.
3. If odour causes adverse off-site impacts that are not mitigated through implementation of odour mitigation measures according to the Odour Management Plan, the Company shall, upon written notification from the District Manager, conduct an investigation into the cause as to why the impacts were not mitigated and submit to the District Manager within the time frame identified in the notice, an assessment of the issues and the need for implementation of contingency actions in accordance with the Odour Management Plan.
4. If the Ministry deems the odour mitigation measures taken as per Condition

2.3 to be unsuitable, insufficient or ineffective, the District Manager may direct the Company, in writing, to propose further measures to address the noted failure, upset or malfunction, which may include requiring a reduction in the receipt of waste, cessation of the receipt of waste, removal and disposal of waste from the waste diversion area, the removal of leachate from the Site as well as, making repairs or modifications to equipment or processes. Such measures shall be implemented by the Company upon approval by the District Manager.

5. If the cessation of the receipt of waste is required, as determined by Condition 2.4, no waste shall be received at the Site until the District Manager is satisfied that odour impacts have been adequately mitigated.
6. The Company shall prepare and maintain an annual summary of the actions taken and achievements made under the Odour Management Plan as of December 31 of the previous calendar year.

3. NOISE

1. The Company shall, at all times, ensure that the noise emissions from the Facility comply with the limits set out in Ministry Publication NPC-300.
2. The Company shall, at all times, ensure that the noise emissions from the landfill site operations at the Facility comply with the limits set out in Ministry draft publication Noise Guidelines for Landfill Sites.
3. The Company shall ensure that the operating times and numbers of Equipment are limited as detailed in Section 2 of the Acoustic Assessment Report.
4. The Company shall limit Truck arrivals and departures to a maximum of sixteen (16) trucks per sixty (60) minute period, restricted to the daytime hours from 7 a.m. to 7 p.m.

4. COMPLAINTS RESPONSE PROCEDURE

1. The Company shall develop in consultation with the District Manager, not later than three (3) months from the date of this Approval, implement and continue to update as necessary, a Complaint Response Protocol for dealing with and responding to environmental complaints as a result of operation of the Equipment/Facility approved by this Approval. The Complaint Response Protocol shall include:
 - a. procedures for recording the complaint;
 - b. procedures for investigating the complaint, including determining all possible causes of the complaint, and the necessary actions to appropriately deal with the cause of the subject matter of the complaint;

- c. procedures for taking the necessary actions to appropriately deal with the cause of the subject matter of the complaint in a timely and effective manner;
- d. a description of any measures taken to address the complaint, outcome of the actions taken and steps to be taken to avoid the recurrence of similar incidents;
- e. procedures for record keeping of activities relating to the complaints;
- f. procedures for notifying the District Manager of the complaint in a manner acceptable to the District Manager; and
- g. procedures for replying to the complainant.

5. RECORD RETENTION

1. Any information requested by any employee in or agent of the Ministry concerning the Facility and its operation under this Approval, including, but not limited to, any records required to be kept by this Approval, shall be provided to the employee in or agent of the Ministry, upon request, in a timely manner. Unless otherwise specified in this Approval, the Company shall retain, for a minimum of five (5) years from the date of their creation all reports, records and information described in this Approval, including,
 - a. a copy of the ESDM Report;
 - b. a copy of the Odour Management Plan and activities pertaining to the implementation of the Odour Management Plan;
 - c. a copy of the Acoustic Assessment Report;
 - d. records of maintenance, repair and inspection of Equipment/Facility;
 - e. all records of any upset conditions associated with the operation of the Equipment/Facility;
 - f. all records on the environmental complaints, as required under condition 4.

6. 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.

SCHEDULE A

Supporting Documentation

1. Environmental Compliance Approval Application and all supporting information, dated November 5, 2024, signed by Richard Weldon and submitted by the Company;
2. Emission Summary and Dispersion Modelling Report, dated March 18, 2024 and prepared by GHD;
3. Odour Management Plan, dated March 18, 2024 and prepared by GHD;
4. Acoustic Assessment Report prepared by GHD, dated February 28, 2024 and signed by Michael Masschaele;
5. The additional information provided by Michael Masschaele of GHD in the email dated July 15, 2025; and
6. Design and Operations Report – Rev. 2, dated March 27, 2024 and prepared by GHD.

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

1. Condition No. 1 is included to emphasize that the Equipment/Facility 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 ensure that the Equipment/Facility is operated in a manner that does not result in unacceptable odour emissions and mitigation measures are employed in event of an odour impact.
3. Condition No. 3 is included to provide the minimum performance requirements

considered necessary to prevent an adverse effect resulting from the operation of the Equipment/Facility.

4. Condition Nos. 4 and 5 are included to require the Company to keep records and to provide information to the Ministry so that compliance with the EPA, the regulations and this Approval can be verified.
5. Condition No. 6 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). 7323-C6EJUM issued on September 24, 2021.

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

and

The Minister of the Environment,
Conservation and Parks
777 Bay Street, 5th Floor

and

The Director appointed for the purposes of
Part II.1 of the *Environmental Protection Act*
Ministry of the Environment, Conservation

Toronto, Ontario
M5G 1E5
OLT.Registrar@ontario.ca

Toronto, Ontario
M7A 2J3

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 9th day of September,
2025

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

QN/
c: District Manager, MECP Hamilton - District
Ryan Loveday, GHD