

**REVOCATION OF ENVIRONMENTAL COMPLIANCE APPROVAL**

Issue Date: September 9, 2025

No Waste Recycling Services Ltd.  
355 Riverbend Drive  
Kitchener, Ontario  
N2B 2G1

Site Location: 355 Riverbend Drive  
Kitchener City, Regional Municipality of Waterloo  
N2B 2G1

*In accordance with Section 139(1)(e) of the Environmental Protection Act, R.S.O. 1990, c. E. 19 (Environmental Protection Act), I hereby give notice that, under s. 20.3 of Part II.1 of the Act, I have revoked Approval No. 1171-9L8L2R issued on April 20, 2022 for a 0.98 hectare Waste Disposal Site (Transfer) located at 355 Riverbend Drive, Kitchener, Ontario, to be used for the transfer of non-hazardous, solid waste limited to construction and demolition waste.*

The reasons for the decision are set out below.

Site and Ownership Information

1. No Waste is the current operator of a waste transfer station for construction and demolition waste located at 355 Riverbend Drive in Kitchener ('the Site'). The current Director of No Waste is Corey Stone. Prior to July 2017, Teresa Tregunna was the Director, President, Secretary and Treasurer of No Waste.
2. It is my understanding that DRP Recycling Ltd. is the owner of the Site and the current Director of that corporation is Dorel Pekurar.
3. No Waste leases the property from DRP Recycling Ltd.

Environmental Compliance Approvals (ECAs)

4. No Waste currently has two ECAs for the Site: an amended waste ECA (1171-9L8L2R) issued

on April 20, 2022 (“the Waste ECA”) and a sewage works ECA (6884-AGVMAN) issued on February 3, 2017 (“the Sewage ECA”). In accordance with Condition 2 of the Sewage ECA (Expiry of Approval), any part of the sewage works at the site not built by January 30, 2019 is no longer approved under ECA No. 6884-AGVMAN. No sewage works have been built at the site.

5. The Waste ECA approves No Waste to operate a waste transfer site for non-hazardous, solid waste limited to construction and demolition waste. Under the Waste ECA, No Waste was also required to construct and develop a tipping area in accordance with the plans and specifications detailed in Items (4) and (5) of Schedule "A" in the Waste ECA, which includes an underground storage tank and engineered controls to be used for the control and storage of any contact water.

#### Ministry of the Environment, Conservation and Parks (MECP) Inspections

5. In August 2016, a Provincial Officer/Environmental Officer carried out an inspection of the site and non-compliance with the following conditions of the Waste ECA was found:
  - (a) Condition 15.1 (b) required all waste to be tarped and covered during times in which the site was not in operation. During the inspection, the operator indicated this was being done; however subsequent observations confirmed the waste pile to be uncovered when not operational.
  - (b) Condition 7.3 required an updated Financial Assurance re-evaluation. No re-evaluation had been completed.
  - (c) Conditions 10.1, 10.2, 10.3 and 10.4 required the construction of an engineered fabric covered building to store all waste indoors to prevent stormwater from leaching through the waste and discharging off-site. No Waste failed to construct this building on or before the required June 1, 2015 deadline, and no building was present during the inspection.
  - (d) Condition 12.1 (b) required the Waste ECA number to be posted on the company sign facing the street. The number was not present during the inspection.
  - (e) Condition 15.2 (a) and (b) required all waste to be unloaded/sorted/stored and re-loaded inside the building. As above, the required building had not been constructed at the time of the inspection.
  - (f) Condition 17.1 required minimizing contact between stormwater and waste. As above, waste was observed not being covered during non-operational hours.
  - (g) Condition 20.7 required a written contingency plan. No such plan was available during the inspection.
6. Since the 2016 inspection there have been numerous site visits and ministry correspondence to No Waste’s Director and former Director confirming ongoing non-compliance.

7. On May 9, 2022, a Provincial Officer/Environmental Officer and a ministry District Engineer conducted a site visit to follow up on clean-up activities related to a fire at the Site on May 8, 2022. The following non-compliances with the Waste ECA were observed:
- (a) Conditions 10.1, 10.2, 10.3 and 10.4 required the construction of an engineered fabric covered building to store all waste indoors to prevent stormwater from leaching through the waste and discharging off-site. No building had been constructed at the time of the site visit.
  - (b) Condition 15.2 (a) and (b) required all waste to be unloaded/sorted/stored and re-loaded inside the building. As above, the required building had not been constructed at the time of the site visit.
  - (c) In addition, the company failed to report the spill to Spills Action Centre (SAC) forthwith as required by s. 92 of the EPA, nor were they planning to take action to prevent the migration of impacted firewater to the Grand River until required to do so by MECP staff from SAC and the District Office.

#### MECP Provincial Officer's Orders and Director's Orders

8. On September 19, 2016, a Provincial Officer's Order numbered 0861-ADEMU8 was issued to No Waste. The order required No Waste to:
- Immediately ensure that the waste pile on-site was fully tarped when the Site was not in operation;
  - Submit a plan to address construction of the required engineered fabric covered building;
  - Implement the plan upon being notified of its acceptance by the ministry.
9. Ongoing non-compliance with the tarping provision of the order was referred to the ministry's Environmental Investigations and Enforcement Branch (EIEB) on October 3, 2016.
10. Between 2016 and 2018, No Waste made no substantive progress on addressing compliance issues despite ongoing ministry monitoring and follow up.
11. As a result, on January 8, 2019, a Director's Order numbered 8363-B5NNRD was issued by the Director pursuant to EPA section 157.3(5)(b) to No Waste to address ongoing Waste ECA non-compliance. The Director's Order revoked Provincial Officer's Order number 0861-ADEMU8 and required No Waste to ensure that the waste pile was fully tarped when the Site was not in operation, retain a qualified person to develop a plan to address all Waste ECA non-compliance, and implement the plan upon being notified of its acceptance.
12. Ongoing non-compliance with all ordered items was referred to the ministry's EIEB again on September 18, 2020.
13. The ongoing non-compliance with Director's Order 8363-B5NNRD was again referred to the ministry's EIEB for investigation on December 9, 2022.

14. On July 17, 2024, a Provincial Officer's Order was issued requiring compliance with the Waste ECA, which does not permit waste to be deposited at the Site after June 1, 2015 unless the ministry's District Manager confirms in writing that the engineered fabric covered building, once built, is suitable.
15. On July 24, 2024, No Waste requested a review and stay of the Provincial Officer's Order. Ministry staff requested further information from No Waste for the review of the order to support a decision to confirm, alter or revoke the order. This additional information was provided on August 12, 2024.
16. A Director's Order was issued by the Director pursuant to EPA section 157.3(5)(b) confirming the Provincial Officer's Order, with amended dates, on November 28, 2024.
17. The Director's Order was not appealed to the Ontario Land Tribunal.
18. Since the Director's Order was issued, ministry staff received additional information from DRP Recycling Ltd. and No Waste, in addition to a request for extended compliance dates.
  - (a) On August 12, 2024, No Waste provided a request for extended compliance dates in addition to a schedule that proposed attempts to bring the Site into compliance with the ECA.
  - (b) In January 2025, No Waste provided a copy of the lease indicating they had the opportunity to purchase the property since 2017 to control the Site but has failed to do so.
  - (c) Separately, the ministry District Office received information from a different party (not No Waste) that during the same period No Waste was asking for extensions to the compliance dates for the November 28, 2024 Director's Order, No Waste was still not tarping the waste properly.
19. The Director pursuant to EPA section 157.3(5)(b) considered the additional information and declined No Waste's request to extend compliance dates. As outlined in the November 28, 2024 Director's Order, No Waste was ordered to cease accepting waste effective January 31, 2025.
20. No Waste has reported to the Area Environmental Officer that waste is being removed from the Site as of February 3, 2025.

#### MECP's Convictions, Charges and Fines

21. On July 25, 2017, No Waste was charged with committing eight offences under the EPA.
22. On January 24, 2018, No Waste was convicted of one offence under the EPA related to non-compliance with a ministry order. The company was fined \$10,000 plus a victim fine surcharge (VFS) of \$2,500. Teresa Tregunna (Director of No Waste prior to July 2017) was

convicted of one offence under the EPA related to director liability and fined \$5,000 plus a VFS of \$1,250.

(a) The current status of all the fines paid and outstanding for both No Waste and Director:

- (i) No Waste's fine remains outstanding at this time.
- (ii) The Director paid her fine in full on February 22, 2019.

23. On November 16, 2022, No Waste was convicted of three violations under the EPA for failing to comply with a Director's Order and fined \$22,000 plus a VFS of \$5,500. The No Waste Director, Corey Stone, was convicted of one violation under the EPA and fined \$5,000 plus a VFS of \$1,250.

(a) As part of sentencing, the Court issued an order to No Waste under Section 190 of the EPA requiring that the waste piles be tarped and covered while the Site is not in operation.

### Conclusion

In making this decision to revoke, I have considered the following:

- (1) The seriousness and frequency of non-compliance over a period of almost ten years demonstrated through proactive inspections at the Site, numerous ministry communications with No Waste and its officers regarding non-compliance at the Site, referrals to the ministry's EIEB.
- (2) Frequency of non-compliance found through ministry inspections that confirmed serious and repeated violations of conditions of approvals, Provincial Officer's Orders, Director's Orders and court orders.
- (3) The ministry's receipt of complaints from other businesses in the waste transfer/processing industry with concerns about No Waste's non-compliant operational practices.
- (4) Conviction history for No Waste is a total of two related convictions since 2017 for violations of the EPA and total fines for related offences totalling approximately \$32,000 (plus victim surcharges). The Directors of No Waste have a history of two convictions for violations of the EPA with total fines of approximately \$10,000 (plus victim surcharges).

The past conduct of No Waste affords me reasonable grounds to believe that the company will not engage in the activity in accordance with the Environmental Protection Act and the Waste ECA.

Therefore, I hereby exercise my powers under section 20.7 and section 20.13 of the EPA to revoke ECA 1171-9L8L2R issued on April 20, 2022 for a waste transfer station.

In accordance with Section 139 of the *Environmental Protection Act*, you may by written notice served upon me and the Ontario Land Tribunal within 15 days after receipt of this notice, require a hearing by the Tribunal. Section 142 of the *Environmental Protection Act* provides that the notice requiring the hearing ("the Notice") shall state:

- a. The grounds on which you intend to rely at the hearing considering your appeal.

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 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](http://www.olt.gov.on.ca)

DATED AT TORONTO this 9th day of September, 2025



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Mohsen Keyvani, P.Eng.

Director

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

DL/

c: District Manager, MECP Guelph  
Dorel Pekurar, No Waste Recycling Services Ltd.