

ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 4300-DNRP34
Issue Date: December 19, 2025

A & A Environmental Consultants Inc.
16 Young Street
Woodstock, Ontario
N4S 3L4

Site Location: 149, 157 & 159 Main Street South
Town of Newmarket, Regional Municipality of York

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) in-situ remediation process to treat contaminated soil and groundwater by the injection of non-hazardous Remedial Amendment(s) into contaminated soil/groundwater, and to prevent off-site migration of contaminated groundwater by the installation of a permeable reactive barrier;

all in accordance with the Environmental Compliance Approval Application submitted by A & A Environmental Consultants Inc., dated July 19, 2024 and signed by Ali Rasoul; the supporting information, including a Design and Operations Report prepared by A & A Environmental Consultants Inc., dated October 7, 2024, and signed by Ali A. Rasoul and Sajjad Din; and an email dated November 3, 2025 from Sajjad Din of A & A Environmental Consultants Inc.

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. "Bioaugmentation Compound (s)" means any non-hazardous, non-pathogenic bacterial culture used in the Process as listed in Schedule "A" of this Approval, and as described in this Approval including the safety data sheets (SDS) submitted with the application, to the extent approved by this Approval;
3. "Biostimulation Compound (s)" means any chemical amendment, nutrient amendment or pH adjustment chemical used in the Process to enhance bioremediation, as listed in Schedule "A" of this Approval, and as described in this Approval including the safety data sheets (SDS) submitted with the application, to the extent approved by this Approval;
4. "Chemical Reagent (s)" means any oxidants, reductants, catalysts, biopolymer slurry, soil modifying

compounds, chelating agents, caustics, metal immobilization compounds, sorption compounds, surfactants and tracers used in the Process as listed in Schedule "A" of this Approval, and as described in this Approval including the safety data sheets (SDS) submitted with the application, to the extent approved by this Approval;

5. "Company" means A & A Environmental Consultants Inc., which is responsible for the operation of the Process and includes any successors and assigns;
6. "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;
7. "District Manager" means the York-Durham District Manager;
8. "EPA" means the Environmental Protection Act, R.S.O. 1990, c. E.19;
9. "Equipment" means the equipment associated with the Process as described in this Approval;
10. "Facility" means the entire operation located on the property where the Equipment is located;
11. "Monitoring Plan" means a written monitoring plan, developed for the site, and prepared as a single document by a Qualified Person as described in Condition 4;
12. "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;
13. "Operations and Maintenance Manual" means the written operations and maintenance manual developed for the Facility as described in Condition 3;
14. "Process" means the in-situ remediation processes as described in the Company's application, this Approval, and in the supporting documentation submitted with the application, to the extent approved by this Approval;
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. "Qualified Person" means a person identified as a Professional Engineer or Professional Geoscientist who meets the qualifications set out in subsection 5 (2) of Ontario Regulation 153/04 (Records of Site Condition – Part XV.1 of the Act), as amended, made under the EPA;
17. "Remedial Amendment(s)" means any Bioaugmentation Culture, Biostimulation Compound, or Chemical Reagent listed in Schedule A that is used in the Process with the intent to reduce the soil and/or groundwater concentrations of the Target Compounds at the site;
18. "Remedial Work Plan" means a plan, developed for the site, and prepared as a single document by a

Qualified Person as described in Condition 2;

19. "Schedule" means the schedules attached to, and forming part of, this Approval, namely:

- Schedule "A" - Remedial Amendments;

20. "Soil, Groundwater and Sediment Standards" means Table 2 of the Ministry publication "Soil, Groundwater and Sediment Standards for Use under Part XV.1 of the Environmental Protection Act" dated April 15, 2011, as may be amended;

21. "SPCP" means the written Spill Prevention and Contingency Plan developed by the Company as described in Condition 5;

22. "Supporting Documents" means the Ministry publications that accompany the Soil, Groundwater and Sediment Standards including "Guide for Completing Phase II Environmental Site Assessment under Ontario Regulation 153/04" dated March 2021, as amended; and

23. "Target Compounds" means the Chlorinated Solvents as described in the Company's application, this Approval and in the supporting documentation submitted with the application, to the extent approved by this Approval, that the Equipment is designed to treat.

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. PERFORMANCE REQUIREMENTS

1. The Company shall, at all times, design and operate the Process with the intent to reduce the soil/groundwater concentrations of the Target Compounds to comply with the appropriate criteria provided in the Soil, Groundwater and Sediment Standards, appropriate worker health and safety criteria, or Site specific criteria developed in accordance with the Supporting Documents.
2. The Company shall, ensure that the noise emissions from the Process at the Site comply with the limits set out in Ministry Publication NPC-300.
3. The Company shall, before commencement of operation of the Process at the site, prepare the following:
 - a. a Remedial Work Plan;
 - b. a Monitoring Plan; and
 - c. an Operations and Maintenance Manual.

4. The Company shall, at all times, design and operate the Process so that no Remedial Amendments, Target Compounds, or their decomposition compounds, are permitted to migrate off-Site in groundwater or soil vapour, as a result of the Process, at concentrations greater than the applicable criteria provided in the Soil, Groundwater and Sediment Standards, appropriate worker health and safety criteria or Site specific criteria.

2. REMEDIAL WORK PLAN

1. The Company shall, before commencement of the operation of the Process at the site, prepare and submit to the District Manager for review, a Remedial Work Plan designed for the site that specifies, as a minimum:
 - a. the remedial objectives established for the site;
 - b. an overview of the work to be undertaken by the Company;
 - c. a description of the site;
 - d. land uses at the site and in the immediate surrounding vicinity;
 - e. locations of on-site and off-site receptors and potential migration pathways;
 - f. a site plan overview of the extent of contamination at the Site and any off-site migration;
 - g. locations of the proposed Equipment and points of application of the Process;
 - h. overview of the site geology and hydrogeology, and expected chemical reactions resulting from the operation of the Process; and
 - i. alternative remedial measures to be undertaken in the event that the Process is not successful to meet the Remedial Work Plan objectives.
2. The Company shall implement the Remedial Work Plan after it has been accepted by the District Manager in writing.
3. The Company shall update and revise the Remedial Work Plan as needed or as directed in writing by the District Manager.
4. If the District Manager does not accept the Remedial Work Plan, the District Manager may require the Remedial Work Plan to be revised and re-submitted.

3. OPERATIONS AND MAINTENANCE MANUAL

1. The Company shall, before commencement of operation of the Process at the site, prepare and implement an Operations and Maintenance Manual for the Equipment and Process that specifies, as a minimum:
 - a. major components of the Equipment to be used in the Process;
 - b. frequency of inspections and scheduled maintenance for the Equipment;
 - c. the SPCP procedures to prevent spills relating to the Process;
 - d. procedures to prevent and/or minimize odorous and noise emissions;
 - e. procedures to prevent and/or minimize the build-up of hazardous decomposition compounds with respect to appropriate worker health and safety criteria for the site;
 - f. procedures to prevent any upset conditions and contingency measures to address any off-site migration;
 - g. procedures to record the amount of Remedial Amendments each time these materials are utilized by the Process;
 - h. procedures to record and respond to environmental complaints; and
 - i. steps to be carried out for the discontinuation of the Process.

4. MONITORING AND REPORTING

1. The Company shall, before commencement of operation of the Process at the site, design and submit a Monitoring Plan to the District Manager for review. The Monitoring Plan shall be prepared in accordance with the Supporting Documents for the soil, groundwater and soil vapour at the site to document that the Performance Requirements outlined in Condition 1 are not exceeded and that the Remedial Work Plan objectives are achieved. The Monitoring Plan shall specify, as a minimum:
 - a. the Monitoring Plan objectives;
 - b. a list of analytical and/or indicator parameters;
 - c. a soil vapour monitoring program to assess the levels of Target Compounds at the site with respect to the Remedial Work Plan and appropriate worker health and safety criteria for the site;
 - d. identification of potential migration pathways on-site and off-site;

- e. procedures for monitoring any potential off-site migration of Remedial Amendments, Target Compounds, or their decomposition compounds;
 - f. approximate monitoring locations and frequency of the monitoring, prior to, during and after the Process; and
 - g. sampling methodology and QA/QC procedures, when applicable.
2. The Company shall implement the Monitoring Plan after it has been accepted by the District Manager in writing.
 3. The Company shall update and revise the Monitoring Plan as needed or as directed in writing by the District Manager.
 4. If the District Manager does not accept the Monitoring Plan, the District Manager may require the Monitoring Plan to be revised and re-submitted.
 5. The Company shall submit, not later than March 31, 2026 and each subsequent six months thereafter, to the District Manager a Semi- Annual Report on the results of the Monitoring Plan and status of the Remedial Work Plan implementation for the preceding period. Each Semi-Annual Report shall include, as a minimum, the following:
 - a. an overview of the operation of the system;
 - b. the frequency and scope of the monitoring;
 - c. a summary of the results of analytical and/or indicator parameters of the level of contamination at the site;
 - d. a trend analysis for the Target Compounds; and
 - e. recommendations for changes to the Monitoring Plan, Remedial Work Plan or Operations and Maintenance Manual, and long-term site controls for the permeable reactive barrier.

5. SPILL PREVENTION AND CONTINGENCY PLAN

1. The Company shall prepare, and implement a written spill prevention and contingency plan that is applicable to the Process at the site. The SPCP shall include appropriate measures to mitigate spills that may result from the Process, including different spill sizes, types of contaminants, and receiving environments (including land, natural waterways, and municipal sewers). The SPCP shall include as a minimum the following information commensurate with the risk of spills at the site:
 - a. containment procedures;

- b. treatment, neutralization and/or clean up procedures;
 - c. disposal procedures that are in accordance with the EPA, and/or municipal by-laws and other legislation as applicable;
 - d. securement of necessary equipment;
 - e. notification procedures; and
 - f. details of the training procedures.
2. The Company shall ensure that employees and agents of the Company have been trained on the SPCP prior to commencement of the Process at the site.
 3. The Company shall review and update the SPCP from time to time as needed.

6. NOTIFICATION OF COMPLAINTS

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

7. RECORD KEEPING REQUIREMENTS

1. The Company shall, retain for a minimum of two (2) years from the date of their creation, all reports, records, and information as described in this Approval, related to or resulting from the operation of the Process at the site including:
 - a. the Remedial Work Plan;
 - b. the Monitoring Plan;
 - c. records about the type and quantity of Remedial Amendments used in the Process;
 - d. site plans and cross sections illustrating the extent of Remedial Amendment placement, the location of injection and monitoring points and all other relevant site features;
 - e. records about the inspection, maintenance, and repair of the major components of the Equipment related to the Process;

- f. all monitoring results including any verification sampling; and
- g. records about complaints, including:
 - i. a description of the time and date of the complaint and of the incident to which the complaint relates;
 - ii. the nature of the complaint and the address of the complainant, if known;
 - iii. weather conditions at the time of the incident to which the complaint relates;
 - iv. a description of the measures taken to determine the possible causes of the complaint and the steps taken to investigate and deal with the cause of the incident to which the complaint relates and the steps taken and/or to be taken to prevent a similar occurrence in the future; and
 - v. a written response to the complainant, if known.

8. 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 the 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"

REMEDIAL AMENDMENTS

The following sets out the Remedial Amendments that have been submitted and approved at the time of the issuance of this Approval. Additional Remedial Amendments may be added upon an amendment to this Approval.

Remedial Amendment	Manufacturer
Activated Carbon Powder	Thermo Fisher Scientific
Calcium hydroxide	Chemco Inc.
Calcium Peroxide	FMC Corporation
Hydrogen Peroxide	Chemco Inc.
PermeOx Plus	FMC Corporation
Potassium Hydroxide	Chemco Inc.
Sodium Hydroxide	FMC Corporation
Sodium Metabisulfite	Solvay Chemical Inc.
Sodium Persulfate	Fisher Scientific Company
Sodium Persulfate KLOZUR	Chemco Inc.
Sodium Sulphite	Solvay Chemical Inc.
Steel and Iron Aggregate	Peerless Metal Powders

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

1. Condition No. 1 is included to outline the minimum performance requirements considered necessary to prevent an adverse effect resulting from the operation of the Process.
2. Condition No. 2 is included to require the Company to gather accurate information and prepare a work plan prior to carrying out the Process at the Site and so that compliance with the EPA and this Approval can be verified.
3. Condition No. 3 is included to emphasize that the Equipment and Process must be operated according to a procedure that will result in compliance with the EPA, the regulations, and this Approval.

4. Condition No. 4 is included to require the Company to gather accurate information so that the environmental impact and subsequent compliance with the EPA, the regulations, and this Approval can be verified.
5. Condition No. 5 is included to require the Company to prevent and mitigate spills thereby minimizing adverse environmental impacts.
6. Condition No. 6 is included to require the Company to notify the Ministry so that the environmental impact and subsequent compliance with the EPA, the regulations, and this Approval can be verified.
7. Condition No. 7 is included to require the Company to retain records and provide information to the Ministry so that the environmental impact and subsequent compliance with the EPA, the regulations, and this Approval can be verified.
8. Condition No. 8 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.

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 19th day of December, 2025



Nancy E Orpana, P.Eng.

Director

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

BR/

c: District Manager, MECP York-Durham

Sajjad Din, A&A Environmental Inc.

Ali A. Rasoul, A&A Environmental Inc.