

**ENVIRONMENTAL COMPLIANCE APPROVAL**

NUMBER 9944-DN4QSS  
Issue Date: January 2, 2026

Woodleigh Farms Ltd.  
528 Sharpe Line  
Cavan Monaghan, Ontario  
L0A 1C0

Site Location: 528 Sharpe Line  
Township of Cavan Monaghan, County of Peterborough

*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:*

A Biochar production facility, consisting of the following processes and support units:

- one (1) continuous pyrolysis kiln, equipped with one (1) start-up natural gas fired burner having a maximum heat input of 422,022 kilojoules per hour discharging into a refractory lined combustion chamber;
- one (1) refractory lined combustion chamber firing pyrolysis gas to provide heat to a wood chip dryer and the continuous pyrolysis kiln;
- one (1) cyclone separator, serving the wood chip dryer and the refractory lined combustion chamber, discharging into the air at a maximum volumetric flowrate of 0.71 cubic metre per second through a stack having an exit diameter of 0.25 metre, extending 0.3 metre above the roof and 6.7 metres above grade;
- one (1) wood chip screener with a maximum daily processing rate of 70.5 tonnes per day; and
- fugitive emissions from material handling, conveyers, truck loading, and associated equipment to support wood chip and biochar processing;

all in accordance with the Environmental Compliance Approval Application submitted by Woodleigh Farms Ltd., dated February 6, 2025 and signed by Norm Lamothe; the supporting information, including the Emission Summary and Dispersion Modelling Report, submitted by Cambium Inc., dated September 16, 2025, and signed by Cody Given; and the Acoustic Assessment Report submitted by Cambium Inc., dated February 6, 2025, and signed by Trevor Copeland; and an email dated October 30, 2025 from

Norm Lamothe of Woodleigh Farms Ltd.

*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 and Appendix A of the Basic Comprehensive User Guide by Cambium Inc., dated February 6, 2025 and signed by Trevor Copeland, submitted in support of the application, that documents all sources of noise emissions and Noise Control Measures present at the Facility;
2. "Approval" means this Environmental Compliance Approval, including the application and supporting documentation listed above;
3. "Best Management Practices Plan" means a document which describes measures to minimize dust emissions from the Facility, and at minimum, be prepared in accordance with Ministry Technical Bulletin: Management Approaches for Industrial Fugitive Dust Sources;
4. "Clean Wood" means untreated wood, untreated wood products or natural biomass;
5. "Company" means Woodleigh Farms Ltd, 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;
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 District Manager of the appropriate local district office of the Ministry, where the Facility is geographically located;
8. "EPA" means the *Environmental Protection Act*, R.S.O. 1990, c.E.19;
9. "Equipment" means 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;
10. "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 Cambium Inc., dated September 16, 2025 and signed by Cody Given, submitted in support of the application, and includes any changes to the report made up to the date of issuance of this Approval;
11. "Facility" means the entire operation located on the property where the Equipment is located;
12. "Manager" means the Manager, Technology Standards Section, Technical Assessment and Standards Development Branch, or any other person who represents and carries out the duties of the Manager, Technology Standards Section, Technical Assessment and Standards Development Branch, as those duties relate to the conditions of this Approval;

13. "Manual" means a document or a set of documents that provide written instructions to staff of the Company;
14. "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;
15. "Noise Control Measures" means measures to reduce the noise emissions from the Facility and/or Equipment including, but not limited to, silencers, acoustic louvers, enclosures, absorptive treatment, plenums and barriers;
16. "O. Reg. 419/05" means Ontario Regulation 419/05: Air Pollution – Local Air Quality, made under the EPA;
17. "Pre-Test Plan" means a plan for the Source Testing including the information required in Section 5 of the Source Testing Code;
18. "Procedure Document" means Ministry guidance document titled "Procedure for Preparing an Emission Summary and Dispersion Modelling Report" dated March 2018, as amended;
19. "Publication NPC-233" means the Ministry Publication NPC-233, "Information to be Submitted for Approval of Stationary Sources of Sound", October, 1995, as amended;
20. "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;
21. "Schedule" means the schedules attached to, and forming part of, this Approval, namely:
  - Schedule A - Source Testing Procedure;
  - Schedule B - Emission Limits for Test Contaminants;
22. "Source Testing" means site-specific sampling and testing to measure emissions resulting from operating the Equipment under operating conditions that will derive an emission rate that, for the relevant averaging period of the contaminant, is at least as high as the maximum emission rate that the source of contaminant is reasonably capable of, or a rate approved by the Manager within the approved operating range of the Equipment which satisfies paragraph 1 of subsection 11(1) of O. Reg. 419/05;
23. "Source Testing Code" means the Ontario Source Testing Code, dated June 2010, prepared by the Ministry, as amended;
24. "Test Contaminants" means the contaminants listed in Schedule B;

25. "Targeted Source" means the cyclone separator while emitting pyrolysis gas 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; and
26. "Technical Bulletin: Management Approaches for Industrial Fugitive Dust Sources" means the Ministry publication "Technical Bulletin: management approaches for industrial fugitive dust sources", March 8, 2017, 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, before 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. emergency procedures, including spill clean-up procedures;
    - iii. procedures for any record keeping activities relating to operation and maintenance of the Equipment;
    - iv. all appropriate measures to minimize noise and odorous emissions from all potential sources;
    - v. all appropriate measures to minimize the risk of explosions from the emission of combustion gases; and
    - vi. the frequency of inspection and replacement of the filter material in the Equipment;
  - b. implement the recommendations of the Manual.
2. The Company shall ensure that only wood chips made of Clean Wood as defined by this Approval may be used in the pyrolysis kiln.

3. The Company shall ensure that no materials containing halogens (chlorine, fluorine, bromine, iodine), including but not limited to polyvinyl chloride (PVC), halogenated plastics, or treated wood, shall be loaded into the Pyrolysis Kiln.

## **2. FUGITIVE DUST CONTROL**

1. The Company shall, at all times, take all reasonable measures to minimize fugitive dust emissions from all potential sources at the Facility.
2. The District Manager may require the Company to prepare and submit a Best Management Practices Plan for fugitive dust control at any time.

## **3. SOURCE TESTING**

1. The Company shall perform Source Testing in accordance with the procedures in Schedule A to determine the rates of emissions of the Test Contaminants from the Targeted Source while emitting pyrolysis gas.
2. The Company shall ensure that the emissions of the Test Contaminants in the undiluted gases emitted from the stack of the Targeted Source shall not be greater than the emission limits specified in Schedule B of this Approval.

## **4. 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; and
  - b. all records of any environmental complaints, including:
    - i. a description, time and date of each incident to which the complaint relates;
    - ii. wind direction at the time of the incident to which the complaint relates; and
    - iii. a description of the measures taken to address the cause of the incident to which the complaint relates and to prevent a similar occurrence in the future.

## **5. 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.

## **6. 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.

## **7. 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**

### **Source Testing Procedures**

1. The Company shall, submit, not later than three (3) months after the date of this Approval, a Pre-Test Plan to the Manager for the Source Testing of the Targeted Source, required under this Approval.
2. The Company shall finalize the Pre-Test Plan in consultation with the Manager.
3. The Company shall not commence the Source Testing required under this Approval until the Manager has accepted the Pre-Test Plan.
4. The Company shall complete the Source Testing, no later than three (3) months after the Manager has approved the Pre-Test Plan or a date agreed upon in consultation with the District Manager.
5. The Company shall notify the Manager, the District Manager and the Director in writing of the location, date and time of any impending Source Testing required by this Approval, at least fifteen (15) days prior to the Source Testing.
6. The Company shall submit a report (electronic format) on the Source Testing to the Manager, the District Manager and the Director not later than three (3) months after completing the Source Testing. The report shall be in the format described in the Source Testing Code, and shall also include, but not be limited to:
  1. an executive summary;
  2. all records of the operating conditions at the time of Source Testing, including but not limited to the following:
    - a. all records of the operating conditions, including the temperature of the pyrolysis kiln, refractory lined combustion chamber and the exhaust gas;
    - b. production data;
    - c. Equipment/process information related to the operation of the Targeted Source;
    - d. description of the emission sources controlled by the Targeted Source at the time of testing; and
    - e. summary of any notifications made under Condition 3 of this Approval.
  3. the results of Source Testing, including the emission rate and emission concentration of the Test Contaminants;

4. a tabular comparison of calculated emission rates based on Source Testing results for the Test Contaminants to relevant estimates described in the ESDM Report; and
  5. recommendations for optimizing the operation of the Equipment to minimize the emissions from the Equipment.
7. The Director may not accept the results of the Source Testing if:
1. the Source Testing Code or the requirements of the Manager were not followed; or
  2. the Company did not notify the Manager, the District Manager and the Director of the Source Testing; or
  3. the Company failed to provide a complete report on the Source Testing.
8. If the Director does not accept the results of the Source Testing, the Director may require re-testing. If re-testing is required, the Pre-Test Plan strategies need to be revised and submitted to the Manager for approval. The actions taken to minimize the possibility of the Source Testing results not being accepted by the Director must be noted in the revision.
9. The Company shall update their ESDM Report in accordance with Section 26 of O. Reg. 419/05 and the Procedure Document with the results from the Source Testing if any of the calculated emission factors or calculated emission rates are higher than the predicted rates in the ESDM Report, not later than three (3) months after the submission of the Source Testing report and make these records available for review by staff of the Ministry upon request.

## SCHEDULE B

### Test Contaminants and Emission Limits

Contaminant	Maximum Limit
Total Hydrocarbons Compounds	50 ppm <sub>dv</sub>
Carbon Monoxide	35 ppm <sub>dv</sub>

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

1. Condition No. 1 is 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. Condition No. 2 is 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.

3. Condition No. 3 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.
4. Condition No. 4 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.
5. Condition No. 5 is included to require the Company to notify staff of the Ministry so as to assist the Ministry with the review of the site's compliance.
6. Condition No. 6 is included to provide the minimum performance requirements considered necessary to prevent an adverse effect resulting from the operation of the Facility.
7. Condition No. 7 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](http://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 2nd day of January, 2026



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

BR/

c: District Manager, MECP Peterborough  
Cody Given, Cambium Inc.