

**ENVIRONMENTAL COMPLIANCE APPROVAL**

NUMBER A-500-4243319369

Version: 1.0

Issue Date: December 19, 2025

Pursuant to section 20.3 of the *Environmental Protection Act*, Revised Statutes of Ontario (R.S.O.) 1990, c. E. 19 and subject to all other applicable Acts or regulations this Environmental Compliance Approval is issued to:

2419787 ONTARIO INC.

2355 MCGEE SIDE ROAD  
OTTAWA ONTARIO  
K0A 1L0

For the following site:

2355 McGee Side Road, Carp, 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:

a Liquid Soil processing facility, receiving a maximum of 250 tonnes of liquid soil per day and consisting of the following processes and equipment:

- dewatering;
- drying;
- material handling;
- truck loading;
- soil stockpiles; and
- three (3) settling ponds;

all in accordance with the Environmental Compliance Approval Application submitted by 2419787 Ontario Inc., dated September 20, 2023 and signed by Todd Chayka; the supporting information, including the Emission Summary and Dispersion Modelling Report, submitted by GHD Limited, dated April 30, 2025, and signed by Erik Martinez; and the Acoustic Assessment Report submitted by GHD Limited, dated September 20, 2023, and signed by Mike Masschaele;

and an email dated May 1, 2025 from Joseph Drader of GHD Limited.

## DEFINITIONS

---

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 Limited, dated September 20, 2023, and signed by Mike Masschaele;
2. "Approval" means this Environmental Compliance Approval, including the application and supporting documentation listed above;
3. "Best Management Practices Plan" means a document or a set of documents which describe measures to minimize dust emissions from the Facility and/or Equipment;
4. "Best Management Practices for Industrial Sources of Odour" means the Ministry publication titled "Best Management Practices for Industrial Sources of Odour" dated January 31, 2017, as amended;
5. "Company" means 2419787 Ontario Inc, that is responsible for the construction or operation of the Facility 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 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, as amended;
9. "Equipment" means the equipment associated with the Process 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 GHD Limited, dated April 30, 2025, and signed by Erik Martinez, 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. "Liquid Soil" has the same meaning as defined in the Waste Approval;

13. "Manual" means a document or a set of documents that provide written instructions to staff of the Company;
14. "Maximum Acceptable Contaminant Concentration" means the maximum allowable contaminant concentration in the Liquid Soil, as assessed in the ESDM report, that can be processed at the Facility to ensure compliance with O. Reg. 419/05 and is not likely to cause an adverse effect;
15. "Minister" means the Minister of the Environment, Conservation and Parks or such other member of the Executive Council as may be assigned the administration of the EPA under the *Executive Council Act*;
16. "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;
17. "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;
18. "Odour Management Plan" means a document, prepared by a Professional Engineer, which describes the measures to minimize odour emissions from the Facility and/or Equipment;
19. "O. Reg. 419/05" means Ontario Regulation 419/05: Air Pollution – Local Air Quality, made under the EPA;
20. "Procedure Document" means Ministry guidance document titled "Procedure for Preparing an Emission Summary and Dispersion Modelling Report" dated March 2018, as amended;
21. "Process" means the soil dewatering and drying process described in the ESDM report;
22. "Processed Soil" means Liquid Soil that has undergone dewatering and drying;
23. "Professional Engineer" means a person who holds a licence or temporary licence under the *Professional Engineers Act*, R.S.O. 1990, c. P.28;
24. "Publication NPC-233" means the Ministry Publication NPC-233, "Information to be Submitted for Approval of Stationary Sources of Sound", October, 1995, as amended;
25. "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;
26. "Source Site" means the location of origin of the Liquid Soil which is received at the site for processing;
27. "Waste Approval" means the Environmental Compliance Approval and any Schedules attached to it, including the application and its supporting documentation for activities set out under section 27 of the EPA and carried out at the Facility;

## TERMS AND CONDITIONS

---

You are hereby notified that this environmental compliance approval is issued to you subject to the terms and conditions outlined below:

### 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 thirty (30) days after the date of this Approval, 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. frequency of inspections and scheduled preventative maintenance of the Equipment;
    - iii. procedures to record the quantity of Liquid Soil accepted and processed at the Facility;
    - iv. procedures to record the quantity of Processed Soil stored and transferred at the Facility;
    - v. procedures to verify and record the level of contaminants in the Liquid Soil delivered to the Facility;
    - vi. procedures to verify and record the level of contaminants in the Processed Soil at the Facility;
    - vii. procedures to prevent and/or minimize, monitor and record odour from the Facility and measures to address odour complaints resulting from the operation of the Facility;
    - viii. procedures to prevent and/or minimize noise, odour, and fugitive dust emissions from all potential sources;
    - ix. contingency measures to address upset conditions; and
    - x. procedures to record and respond to environmental complaints;
  - b. implement the recommendations of the Manual.
2. The Company shall process no more than 250 tonnes a day of Liquid Soil having contaminant concentrations less than or equal to the Maximum Acceptable Contaminant Concentration.

3. The Company shall ensure that the storage capacity of Liquid Soil and Processed Soil at the site is in accordance with the Waste Approval.
4. The Company shall ensure that the Equipment at the site is configured in accordance with the ESDM Report.
5. The Company shall ensure that no soil handling activities, including screening, transfer to storage piles or into vehicles, are carried out during windy conditions that could result in adverse off-site airborne impacts.

## **2. FUGITIVE DUST CONTROL**

1. The Company shall,
  - a. within thirty (30) days after the date of this Approval implement the Best Management Practices Plan for the control of fugitive dust emissions resulting from the operation of the Facility;
  - b. review and update the Best Management Practices Plan annually or at the direction of the District Manager;
  - c. record the results of each review and update the Best Management Practices Plan within thirty (30) days of the completion of the review;
  - d. maintain the updated Best Management Practices Plan at the Facility and provide a copy to the District Manager within forty-five (45) days of the update; and
  - e. implement, at all times, the most recent version of the Best Management Practices Plan.
2. The Company shall record, either electronically or in a log book, each time a specific preventative and control measure described in the Best Management Practices Plan is implemented. The Company shall record, as a minimum:
  - a. the date when each emission control measure is installed, including a description of the control measure;
  - b. the date when each new preventative measure or operating procedure to minimize emissions is implemented, including a description of the preventative measure or operating procedure; and
  - c. the date, time of commencement, and time of completion of each periodic activity conducted to minimize emissions, including a description of the preventative measure/procedure and the name of the individual performing the periodic activity.

## **3. ODOUR MANAGEMENT PLAN**

1. The Company shall, at all times, take all reasonable measures to minimize odorous

emissions from all potential sources at the Facility.

2. The Company shall prepare and submit to the District Manager for review not later than three (3) months from the date of this Approval, an Odour Management Plan that includes measures to minimize odour impacts of the Facility at Sensitive Receptors. The Odour Management Plan shall include:
  - a. Facility and process descriptions including a list of all potential sources of odour;
  - b. preventative and control measures to minimize the likelihood of high odorous emissions from the Facility. Details of the preventative and control measures shall include:
    - i. a description of the control equipment;
    - ii. a description of the preventative procedures to be implemented; and/or
    - iii. the frequency of occurrence of periodic preventative activities;
  - c. best management practices described in the Ministry's Technical Bulletin entitled "Best Management Practices for Industrial Sources of Odour" for effective odour reduction, including:
    - i. periodic preventative activities and their frequency;
    - ii. inspection and maintenance procedures;
    - iii. monitoring initiatives;
    - iv. record keeping practices for odour complaints and steps taken to address each complaint; and
    - v. training of Facility personnel.
3. The Company shall:
  - a. implement the Odour Management Plan after the Odour Management Plan is accepted by the District Manager in writing; and
  - b. update and revise the Odour Management Plan as needed, or at a frequency directed or agreed to in writing by the District Manager.
4. The Company shall record and retain records each time a specific preventative and odour impact reduction measure described in the Odour Management Plan is implemented.
5. If the District Manager does not accept the Odour Management Plan, the District Manager may require the Odour Management Plan to be revised and re-submitted.

#### **4. COMPLAINT RESPONSE**

1. The Company shall post on a sign in a prominent location at the Facility entrance a 24-hour telephone number to contact a designated representative to receive public complaints regarding emissions resulting from the operations at the Facility.
2. The Company shall respond to complaints according to the following procedure:
  - a. record and number each complaint, either electronically or in a log book, and shall include the following information:
    - i. the nature of the complaint;
    - ii. the name and the telephone number of the complainant (if provided); and
    - iii. the time and date of the complaint.
  - b. the Company shall immediately initiate an investigation of the complaint. The investigation shall include, as a minimum, the following:
    - i. a determination of the activities being undertaken in the Facility at the time of the complaint;
    - ii. meteorological conditions including, but not limited to the ambient temperature, approximate wind speed and its direction;
    - iii. an assessment of all the possible cause(s) of the complaint;
    - iv. remedial action(s) to address the cause(s) of the complaint; and
    - v. implementation of remedial action(s) to eliminate the cause(s) of the complaint.
  - c. the Company shall document the response provided to the complainant, if known, and shall make the document(s) available for inspection by staff of the Ministry upon request. The response shall include:
    - i. the results of the investigation of the complaint;
    - ii. the action(s) taken or planned to be taken to address the cause(s) of the complaint; and
    - iii. follow-up response(s).
  - d. the Company shall, within two (2) business days of the complaint, submit a report to the District Manager which fulfils the requirements of Condition 6.

#### **5. 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 operation, maintenance, repair and inspection of the Process and associated Equipment;
- b. all records related to Soil processing, including:
  - i. quantity of Liquid Soil received and processed at the Facility;
  - ii. quantity of Processed Soil processed and transferred at the Facility;
  - iii. the concentration of the contaminants in the Liquid Soil as measured at the Source Site; and
  - iv. all verification sampling and testing of the Liquid Soil and Processed Soil.
- c. 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.

## **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. this Approval number;
  - b. a description of the nature of the complaint;
  - c. the time and date of the incident to which the complaint relates;
  - d. the wind direction at the time of the incident to which the complaint relates; and
  - e. a description of the remedial measures taken to address the cause of the incident to which the complaint relates and to prevent a similar occurrence in the future.

## **7. NOISE**

1. The Company shall limit the number of Vacuum Truck arrivals and departures



to/from the Facility to six (6) per sixty (60) minute period.

2. The Company shall restrict all Vacuum Tuck arrivals and departures to/from the Facility to the hours of 7 AM to 7 PM (i.e., daytime hours as defined in Ministry Publication NPC-300).
3. The Company shall restrict all activities at the Facility to the hours of 7 AM to 7 PM (i.e., daytime hours as defined in Ministry Publication NPC-300).
4. No later than six (6) months after the issue date of this Approval, the Company shall install Berms 1 and 2 (as described in the Acoustic Assessment Report), along the southern property boundary on the north side of McGee Side Road, extending from the western property boundary to the eastern property boundary, without any gaps or openings other than the opening at the road entrance to the Facility, and having a minimum height of 4.6 metres.
5. The Company shall, at all times, ensure Berms 1 and 2, located at the Facility, have the dimensions, locations and physical properties as described in the Acoustic Assessment Report.
6. 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.

## **8. CHANGE OF OWNERSHIP**

1. The Company shall notify the Director in writing, and forward a copy of the notification to the District Manger, 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.

## REASONS

---

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

1. Condition Nos. 1 to 3 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. Condition No. 4 is included to require the Company to respond to complaints resulting from the operation of the Facility, according to a procedure that includes methods for preventing recurrence of similar incidents and a requirement to prepare a written report.
3. Condition No. 5 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. Conditions 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.
5. Condition No. 7 is included to provide the minimum performance requirements considered necessary to prevent an adverse effect resulting from operation of the Facility.
6. 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.

## APPEAL PROVISIONS

---

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 the service of this notice, require a hearing by the Tribunal. You must also provide notice to, the Minister of the Environment, Conservation and Parks in accordance with Section 47 of the *Environmental Bill of Rights*, 1993 who 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:

1. 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;
2. 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](mailto: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 [Ontario Land Tribunal's](#)**

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 [Environmental Registry of Ontario](#), 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

A handwritten signature in black ink, appearing to read 'Sherif Hegazy', with a stylized flourish at the end.

Sherif Hegazy

Director

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

c: Todd Chayka, 2419787 ONTARIO INC.

Mike Masschaele, GHD Limited

Erik Martinez, GHD Limited