

ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 6992-DRTFQ7
Issue Date: March 31, 2026

DS Soils Inc.
52 Fairway Court
Oro-Medonte, Ontario
L0L 2L0

Site Location: 25 and 45 Middleton Court
Barrie City, County of Simcoe, ON

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 2.35 hectare (ha) Waste Disposal Site

to be used for the receipt, processing and transfer non-hazardous waste of the following types:

- Source characterized and uncharacterized Dry Excess Soil consisting of the following chemical qualities:
 - a. Dry Excess Soil meeting Table 2.1 - Excess Soil Quality Standards for residential/parkland/institutional and industrial/commercial/community property use;
 - b. Dry Excess Soil meeting Table 3.1 - Excess Soil Quality Standards for residential/parkland/institutional and industrial/commercial/community property use;
 - c. Dry Excess Soil exceeding Table 3.1 -Excess Soil Quality Standards for industrial/commercial/community property use for petroleum hydrocarbon compound (PHC);
 - d. Dry Excess Soil exceeding Table 3.1 -Excess Soil Quality Standards for industrial/commercial/community property use for sodium adsorption ratio (SAR), electrical conductivity (EC) and metals;
- Liquid Excess Soil; and
- Waste containing dry non-excess soil - road sweepings waste from road/infrastructure

maintenance.

Note: Use of the site for any other type of waste is not approved under this environmental compliance approval, and requires obtaining a separate approval amending this environmental compliance approval.

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

“Approval” means this entire provisional Environmental Compliance Approval document, issued in accordance with section 20.3 of the EPA, and includes any schedules to it, the application and the supporting documentation listed in Schedule "A";

"Amendment Materials" means any amendment material to be used in the Bioremediation to improve the structure/porosity of the Dry Excess Soil to enhance effectiveness of the Bioremediation;

"Bioaugmentation Compound" means the exogenous, non-pathogenic, non-toxic, and specialized microbes used to enhance Bioremediation. In this Approval, it means the Bioaugmentation Compound(s) approved by Health Canada;

"Biopile" means the Dry Excess Soil treatment cell up-to 3 metres in height, mechanically/physically aerated, with additions of Bioaugmentation Compound(s) and/or Biostimulation Compound(s) and/or Amendment Material(s), as described in the supporting documentation listed in the attached Schedule "A";

"Bioremediation" means biodegradation conducted under controlled engineered conditions designed to reduce PHC concentrations in the Dry Excess Soil in the Biopiles, as described in the supporting documentation listed in Schedule "A";

"Biostimulation Compound" means any chemical amendment, nutrient amendment or pH adjustment chemical, other than a Bioaugmentation Compound used in the treatment to enhance Bioremediation.

"Design and Operations Report" means the Design and Operations Report contained within Item 2 of Schedule "A" of this Approval, or the most recent Design and Operations Report that the Owner has submitted from time to time;

“Director” means any Ministry employee appointed in writing by the Minister pursuant to section 5 of the EPA as a Director for the purposes of Part V of the EPA;

“District Manager” means the District Manager of the local district office of the Ministry in which the Site is geographically located;

"Dry Excess Soil" means Excess Soil that is dry soil;

“dry soil" means soil, crushed rock or soil mixed with rock or crushed rock, where it is not liquid soil;

"Excess Soil" means soil, crushed rock or soil mixed with rock or crushed rock, that has been

excavated as part of a project and removed from the project area for the project, and in the context of this Approval, it also includes Liquid Excess Soil as defined in Ontario Regulation 406/19, as amended and does not include waste containing dry non-excess soil;

"Excess Soil Standards" means the document entitled "Part II: Excess Soil Quality Standards", published by the Ministry and dated October 10, 2025, available on a website of the Government of Ontario as Part II of the document entitled "Rules for Soil Management and Excess Soil Quality Standards";

"EPA" means the Environmental Protection Act, R.S.O. 1990, C.E-19, as amended;

"free-phase liquid" also known as nonaqueous phase liquid, are organic liquid contaminants, characterized as being relatively immiscible with water;

"inert fill" means earth or rock fill or waste of a similar nature that contains no putrescible materials or soluble or decomposable chemical substances but does not include Excess Soil;

"Leachate Screening Levels" means values that are listed in the tables of Leachate Screening Levels within Part II – Excess Soil Quality Standards, contained in Appendix 2 of the Soil Rules;

"Liquid Excess Soil" has the same meaning as in Ontario Regulation 406/19 and means a soil that has a slump of more than 150 millimetres using the Test Method for the Determination of "Liquid Waste" (slump test) set out in Schedule 9 to Regulation 347;

"Ministry" means the Ontario Ministry of the Environment, Conservation and Parks;

"Mix" means the mixture of the Dry Excess Soil and the required Biostimulation Compound(s), the Bioaugmentation Compound(s) and the Amendment Materials intended for Bioremediation at the Site;

"NMA" means the Nutrient Management Act, 2002, S.O. 2002, c. 4, as amended;

"Operator" means any person, other than the Owner's employees, authorized by the Owner as having the charge, management or control of any aspect of the Site;

"Ontario Regulation 153/04" means Ontario Regulation 153/04: Records of Site Condition - Part XV.1 of the Act, R.S.O. 1990, c. E. 19, made under the EPA, as amended;

"Ontario Regulation 406/19" means Ontario Regulation 406/19, On-Site and Excess Soil Management, R.S.O. 1990, made under the EPA, as amended;

"Owner" means any person that is responsible for the establishment or operation of the Site being approved by this Approval, and includes DS Soils Inc., its successors and assigns;

"OWRA" means the Ontario Water Resources Act, R.S.O. 1990, c. O.40, as amended;

“PA” means the Pesticides Act, R.S.O. 1990, c. P-11, as amended;

"petroleum hydrocarbons compound (PHC)" within the context of this Approval, mean organic contaminants limited to petroleum hydrocarbon fractions: F1 (C6-C10), F2 (>C10-C16), F3 (>C16-C34), and F4 (>C34) and volatile organic compounds limited to Benzene, Toluene, Ethylbenzene and Xylenes;

"Potentially Contaminating Activity (PCA)" means a use or activity set out in Column A of Table 2 of Schedule D that is occurring or has occurred in a phase one study area;

“Process water or decanted treated effluent” means the liquid portion of the Liquid Excess Soil that is removed from the Liquid Excess Soil and treated on-Site to reduce turbidity and then filtered through granular activated carbon (GAC) media or equivalent.

"Protocol for Analytical Methods Used in the Assessment of Properties under Part XV.1 of the Environmental Protection Act" means the Ministry's document entitled "Protocol for Analytical Methods Used in the Assessment of Properties under Part XV.1 of the Environmental Protection Act" dated March 9, 2004, amended July 1, 2011, and as further amended at any time;

"Processed Dry Excess Soil" means Dry Excess Soil that is recovered from the processing and after chemical characterization of waste containing dry non-excess soil, decanting and drying of Liquid Excess Soil and bioremediation of PHC contaminated Dry Excess Soil;

"Provincial Officer" means any person designated in writing by the Minister as a provincial officer pursuant to Section 5 of the OWRA or Section 5 of the EPA or Section 17 of the PA or Section 4 of the NMA or Section 8 of SDWA;

"Putrescible Waste" means organic waste that rapidly decomposes;

"Qualified Person" or "QP" means a person who meets the qualifications to be a qualified person for conducting a Phase I ESA and a Phase II ESA and for completing certifications in a record of site condition, as set out in Section 5 of Ontario Regulation 153/04 made under the EPA. Qualified Person also means a person as defined in Ontario Regulation 406/19;

"Rock" means a naturally occurring aggregation of one or more naturally occurring minerals that is 2 millimetres or larger in size or that does not pass the US #10 sieve;

“Regulation 347” means Regulation 347, R.R.O. 1990, General - Waste Management, made under the EPA, as amended;

“Residual Waste” means waste that is destined for final disposal or further processing at another approved waste disposal facility;

“Reuse Site” means a site at which Dry Excess Soil is used for a beneficial purpose and does not

include a waste disposal site;

"SDWA" means the Safe Drinking Water Act, 2002, S.O. 2002, c. 32, as amended;

"Site" means the entire 2.35 hectare of property located at 25 and 45 Middleton Court, Barrie City, County of Simcoe, ON;

"Soil Rules" means the document entitled "Rules for Soil Management and Excess Soil Quality Standards", as amended from time to time, published by the Ministry and available on a website of the Government of Ontario;

"Slump Test" means the Test Method for the Determination of "Liquid Waste" (Slump Test) set out in Schedule 9 in Reg. 347;

"TCLP" means the Toxicity Characteristic Leaching Procedure which is defined in Reg. 347 as the Toxicity Characteristic Leaching Procedure;

"Trained Personnel" means personnel knowledgeable in the following through instruction and/or practice:

- a. relevant waste management legislation, regulations and guidelines;
- b. major environmental concerns pertaining to the waste to be handled;
- c. occupational health and safety concerns pertaining to the processes and wastes to be handled;
- d. management procedures including the use and operation of equipment for the processes and wastes to be handled;
- e. emergency response procedures;
- f. specific written procedures for the control of nuisance conditions;
- g. specific written procedures for refusal of unacceptable waste loads;
- h. the requirements of this Approval.

"Unprocessed Waste" means waste that has not fully completed the Owner's processing operations and waste that is in-process is considered unprocessed waste; and

"waste containing dry non-excess soil" means material consisting of dry soil that contain debris and rubble generated from the road sweeping/maintenance work and do not meet the Dry Excess Soil definition of the O. Reg. 409/19, and require processing to remove debris and rubble.

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. Compliance

- 1.1 The Owner shall ensure compliance with all the conditions of this Approval and shall ensure that any person authorized to carry out work on or operate any aspect of the Site is notified of this Approval and the conditions herein and shall take all reasonable measures to ensure any such person complies with the same.
- 1.2 Any person authorized to carry out work on or operate any aspect of the Site shall comply with the conditions of this Approval.
- 1.3 The Site shall be operated and maintained at all times including management and disposal of all waste in accordance with the EPA, Regulation 347, Ontario Regulation 406/19 and the conditions of this Approval. At no time shall the discharge of a contaminant that causes or is likely to cause an adverse effect be permitted.

2. Design, Develop, Build, Operate, Modify and Maintain in Accordance

- 2.1 Except as otherwise provided for in this Approval, the Site shall be designed, developed, built, operated, and maintained in accordance with the application for this Approval dated October 23, 2025, the Design and Operations Report as updated from time to time and the other supporting documentation listed in Schedule "A".
- 2.2 (a) Construction and installation of aspects described in Schedule "A" must be completed within 5 years from the date of issuance of this Approval.

(b) This Approval ceases to apply in respect of the aspects of the Site noted above that have not been constructed or installed before the later of the dates identified in Condition 2.2(a).

3. Interpretation

- 3.1 Where there is a conflict between a provision of any document, including the application, referred to in this Approval and the conditions of this Approval, the conditions in this Approval shall take precedence.
- 3.2 Where there is a conflict between the application and a provision in any documents listed in Schedule "A", the application shall take precedence, unless it is clear that the purpose of the document was to amend the application and that the Ministry approved the amendment.
- 3.3 Where there is a conflict between any two documents listed in Schedule "A", other than the

application, the document bearing the most recent date shall take precedence.

- 3.4 The requirements of this Approval are severable. If any requirement of this Approval, or the application of any requirement of this Approval to any circumstance, is held invalid or unenforceable, the application of such requirement to other circumstances and the remainder of this certificate shall not be affected thereby.

4. Other Legal Obligations

4.1 The issuance of, and compliance with, this Approval does not:

- (a) relieve any person of any obligation to comply with any provision of any applicable statute, regulation or other legal requirement including, but not limited to:
 - (i) obtaining site plan approval from the local municipal authority;
 - (ii) obtaining all necessary building permits from the local municipal authority Building Services Division;
 - (iii) obtaining approval from the Chief Fire Prevention Officer: or
- (b) limit in any way the authority of the Ministry to require certain steps be taken or to require the Owner to furnish any further information related to compliance with this Approval.

4.2 Despite Condition 13, the Site shall not accept, handle, manage, or otherwise process any waste until Site-specific approvals under section 9 of the EPA (air and odour) and section 53 of the OWRA have been obtained.

5. Adverse Effect

5.1 The Owner shall take steps to minimize and ameliorate any adverse effect on the natural environment or impairment of water quality resulting from the Site, including such accelerated or additional monitoring as may be necessary to determine the nature and extent of the effect or impairment.

5.2 Despite an Owner, Operator or any other person fulfilling any obligations imposed by this Approval, the Owner, Operator or any other person remains responsible for any contravention of any other condition of this Approval or any applicable statute, regulation, or other legal requirement resulting from any act or omission that caused the adverse effect to the natural environment or impairment of water quality.

6. Change of Owner

6.1 The Owner 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 changes:

- (a) the ownership of the Site;
 - (b) the appointment of, or change in, an Operator of the Site;
 - (c) the address of the Owner or Operator;
 - (d) the partners, where the Owner is or at 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; and
 - (e) the name of the corporation where the Owner 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.
- 6.2 No portion of this Site shall be transferred or encumbered prior to or after closing of the Site unless the Director is notified in advance and sufficient financial assurance is deposited with the Ministry to ensure that these conditions will be carried out.
- 6.3 In the event of any change in ownership of the Site, other than change to a successor municipality, the Owner shall notify the successor of and provide the successor with a copy of this Approval, and the Owner shall provide a copy of the notification to the District Manager and the Director.
- 6.4 To notify the Ministry of a name/address/ownership change, the Owner shall provide, as applicable:
- (a) A letter from the Owner requesting a change in the name/address/ownership of the business and the date it is effective;
 - (b) A copy of all of the Environmental Compliance Approval(s) which require the name/address/ownership change;
 - (c) Proof of Legal Name (must reflect current name/address/ownership). Examples Include: Updated Corporate Profile Report, Master Business Licence, or "Initial Notice or Notice of Change"; or Articles of Incorporation; or Extra-Provincial Licence (for out of Province/State); or Birth Certificate (for applicants applying as an individual);
 - (d) For ownership changes - provide a letter from the previous owner authorizing the transfer of ownership; and
 - (e) Updated Financial Assurance to reflect the name/address/ownership change.

7. Financial Assurance

- 7.1 By December 31, 2026 or at least 60 days prior to receiving any waste, the Owner shall submit to the Director, Financial Assurance, as defined in Section 131 of the Act, for the amount of \$ 428,197.0. This Financial Assurance shall be in a form acceptable to the Director and shall provide sufficient funds for the analysis, transportation, Site clean-up, monitoring and disposal of all quantities of waste on the Site at any one time.
- 7.2 Commencing on April 30, 2031 and at intervals of every five (5) years thereafter, the Owner shall submit to the Director, a re-evaluation of the amount of Financial Assurance to implement the actions required under Condition 7.1. The re-evaluation shall include an assessment based on any new information relating to the environmental conditions of the Site and shall include the costs of additional monitoring and/or implementation of contingency plans required by the Director upon review of the closure plan and annual reports. The Financial Assurance must be submitted to the Director within 30 days of written acceptance of the re-evaluation by the Director.
- 7.3 At least two (2) months prior to any sequential increase in the maximum on-Site storage capacity authorized under Condition 15.3, the Owner shall provide the required additional Financial Assurance to the Director, in accordance with the payment amount specified in the “Additional FA due” column below.

Stage	Toal waste (tonne)	Cumulative FA (\$)	Additional FA due (\$)	Total FA to be maintained (\$)
Stage 1	5,000	428,197	428,197	428,197
Stage 2	10,000	720,393	292,196	720,393
Stage 3	15,000	1,009,671	289,278	1,009,671
Stage 4	20,000	1,297,539	287,868	1,297,539
Stage 5	23,683.10	1,512,690	215,151	1,512,690

- 7.4 If any Financial Assurance is scheduled to expire or notice is received, indicating Financial Assurance will not be renewed, and satisfactory methods have not been made to replace the Financial assurance at least sixty (60) days before the Financial Assurance terminates, the Financial Assurance shall forthwith be replaced by cash.

8. Inspections

- 8.1 No person shall hinder or obstruct a Provincial Officer from carrying out any and all inspections authorized by the OWRA, the EPA, the PA, the SDWA or the NMA, of any place to which this Approval relates, and without limiting the foregoing:
 - (a) to enter upon the premises where the approved works are located, or the location where the

records required by the conditions of this Approval are kept;

- (b) to have access to, inspect, and copy any records required to be kept by the conditions of this Approval;
- (c) to inspect the Site, related equipment and appurtenances;
- (d) to inspect the practices, procedures, or operations required by the conditions of this Approval; and
- (e) to sample and monitor for the purposes of assessing compliance with the terms and conditions of this Approval or the OWRA, the EPA, the PA, the SDWA or the NMA.

9. Information and Record Retention

- 9.1 Any information requested, by the Ministry, concerning the Site 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 Ministry, upon request, in a timely manner.
- 9.2 The receipt of any information by the Ministry or the failure of the Ministry to prosecute any person or to require any person to take any action, under this Approval or under any statute, regulation or other legal requirement, in relation to the information, shall not be construed as:
 - (a) an approval, waiver, or justification by the Ministry of any act or omission of any person that contravenes any term or condition of this Approval or any statute, regulation or other legal requirement; or
 - (b) acceptance by the Ministry of the information's completeness or accuracy.
- 9.3 All records required by the conditions of this Approval must be retained on Site shall be retained for a minimum of seven (7) years in accordance with Ontario Regulation 406/19.
- 9.4 Any information relating to this Approval and contained in Ministry files may be made available to the public in accordance with the provisions of the Freedom of Information and Protection of Privacy Act, R.S.O. 1990, C. F-31.

10. Service Area

- 10.1 Only waste that is generated within the Province of Ontario shall be accepted at the Site.

11. Hours of Operations

- 11.1 The Site may operate 24 hours per day, seven (7) days per week.

12. Signage and Security

12.1 The Owner shall install a sign at the main entrance/exit to the Site on which is legibly displayed the following information:

- (a) the name of the Site and Owner;
- (b) the number of this Approval;
- (c) a twenty-four (24) hour telephone number that can be used to reach the Owner in the event of a complaint or an emergency;
- (d) the hours during which the Site is open to accept waste; and
- (e) the type of waste that is approved for receipt at the Site.

12.2 The Owner shall operate and maintain the Site in a secure manner, with access to the Site regulated and perimeter of the Site secured by fencing. During non-operating hours, the Site entrance and exit gates shall be locked and the Site shall be secured against access by unauthorized persons.

13. Approved Waste Types

13.1 The Site is approved to receive only the following categories of non-hazardous waste:

- (a) Source characterized and uncharacterized Dry Excess Soil consisting of the following chemical qualities:
 - i. Dry Excess Soil meeting Table 2.1 - Excess Soil Quality Standards for residential/parkland/institutional and industrial/commercial/community property use;
 - ii. Dry Excess Soil meeting Table 3.1 - Excess Soil Quality Standards for residential/parkland/institutional and industrial/commercial/community property use;
 - iii. Dry Excess Soil exceeding Table 3.1 -Excess Soil Quality Standards for industrial/commercial/community property use for petroleum hydrocarbon compound (PHC);
 - iv. Dry Excess Soil exceeding Table 3.1 -Excess Soil Quality Standards for industrial/commercial/community property use for sodium adsorption ratio (SAR), electrical conductivity (EC) and metals;
- (b) Liquid Excess Soil; and
- (c) Waste containing dry non-excess soil - road sweepings waste from road/infrastructure

maintenance.

- 13.2 Under Condition 13.1a.(iii), the Site may receive Dry Excess Soil for Bioremediation that exceeds contaminants limits set out in Table 3.1 only for petroleum hydrocarbons, in concentrations that can be bioremediated in accordance with the Bioremediation process parameters approved in this Approval.
- 13.3 Waste types listed in Condition 13.1 shall not contain free phase liquid or PHC sheen.
- 13.4 In addition to the source characterized Dry Excess Soil specified in Condition 13.1a, the Site may accept uncharacterized Dry Excess Soil, subject to storage in a segregated area and on-Site characterization requirements as outlined in Condition 18.2.

14. Approved Waste Quantities

- 14.1 The amount of waste received per day at the Site shall not exceed the following limits:
- (a) Source characterized and uncharacterized Dry Excess Soil 2,944 tonnes.
 - (b) Liquid Excess Soil 956 tonnes.
 - (c) Waste containing dry non-excess soil - road sweepings waste from road/infrastructure maintenance 100 tonnes.
- 14.2 The Owner shall ensure that the amount of residual waste that may be transferred from the Site for final disposal does not exceed 1,000 tonnes per day, based on annual average.

15. Waste Storage

- 15.1 Waste shall be stored in accordance with the Design and Operations Report included as Item 2 in Schedule "A" and at a minimum the Owner shall ensure that waste storage and processing shall take place only indoor in designated areas as outlined in the Design and Operations Report;
- 15.2 The maximum amount of waste, including unprocessed waste, processed waste, in-process waste and residual waste that may be stored at any time shall not exceed 23,683.1 tonnes with the following breakdown:
- (a) Source characterized and uncharacterized Dry Excess Soil 23,102 tonnes.
 - (b) Liquid Excess Soil 177 tonnes.
 - (c) Waste containing dry non-excess soil - road sweepings waste from road/infrastructure maintenance 200 tonnes.

- (d) Decanted treated effluent 200 tonnes.
- (e) Residual waste 4.1 tonnes.

15.3 The maximum on-Site waste storage capacity may be increased in accordance with the sequence set out below, subject to compliance with the Financial Assurance (FA) requirements specified in Condition 7.3.

Stage	Dry Excess Soil (tonne)	Road sweeping (tonne)	Residual waste (tonne)	Liquid Excess Soil (tonne)	Process water (tonne)	Incremental increase in waste mix (tonne)	Total waste (tonne)
Stage 1	4418.9	200	4.1	177	200	0	5,000
Stage 2	9418.9	200	4.1	177	200	5000	10000
Stage 3	14418.9	200	4.1	177	200	5000	15000
Stage 4	19418.9	200	4.1	177	200	5000	20000
Stage 5	23102.0	200	4.1	177	200	3,683.10	23,683.10

15.4 In the event that residual waste and/or processed waste cannot be transferred from the Site, and the maximum storage capacity approved by Condition 15.2 has been reached, the Owner shall cease accepting any additional waste.

16. Waste Receipt - General

16.1 Trained Personnel shall supervise all shipments of waste received at the Site. Prior to any shipment being unloaded, Trained Personnel shall review the accompanying information for that shipment, and examine the contents of the truck where possible, to ensure the waste matches the description provided and that the waste is permitted to be received further to the conditions of this Approval. If any shipment is suspected of containing unapproved waste, that shipment shall be refused and shall not unloaded at the Site.

16.2 Trained Personnel shall examine all shipments of waste while they are being unloaded. If at any time a shipment is discovered to contain unapproved material, the shipment shall be refused and all portions of the shipment that can be recovered shall be removed from the Site.

16.3 In the event that a shipment of waste is rejected from the Site, the Owner shall forthwith (within 10 business days) notify the District Office of the following in writing:

- (a) the name of the company that brought the rejected load to the Site;
- (b) the license plate number of the vehicle that brought the rejected load to the Site;
- (c) a description of the rejected waste and the reason for rejecting the shipment;

(d) the destination of the rejected waste if the driver provides that information.

16.4 Rubble and debris recovered from the processing of waste containing dry non-excess soil must be stored in a segregated area.

17. Processing Operations

Dry Excess Soil

17.1 Receipt, temporary storage, screening and processing of the Dry Excess Soil that can be Bioremediated as follows:

- (a) optional on-Site mixing of the Dry Excess Soil of similar chemical quality for Bioremediation at the Site;
- (b) mixing of the Dry Excess Soil or the mixed Dry Excess Soil of similar quality with the Bioaugmentation Compound(s) solution, the Biostimulation Compound(s) and the amendment materials into the Mix, as required; and
- (c) Bioremediation of the Mix in Biopiles, including subsequent mechanical/physical aeration, addition of the Bioaugmentation Compound(s) solution, the Biostimulation Compound(s) and/or the amendment materials, as required, and installation of the process monitoring equipment.

17.2 No processing of Dry Excess Soil is permitted except noted above in Condition 17.1.

Liquid Excess Soil

17.3 Processing (separation of liquid from soil and grade separation) of Liquid Excess Soil from hydrovac operations using mechanical plant.

17.4 Drying of decanted soil and/or mixing with drying materials as listed in the Design and Operations Report, included as Item 2 in Schedule "A".

17.5 Treatment of dewatering effluent using non-hazardous flocculant agent (Core Shell™ 71325, Ultrion™ 8155 and/or Nalco 8177) specified in the Design and Operations Report included as Item 2 in Schedule "A" or other non-hazardous polymer and coagulants to be authorized by District Manager for use in the water clarification process.

Waste containing dry non-excess soil

17.6 Processing of waste containing dry non-excess soil (road sweepings) is limited to segregation of gravel, soils, debris and rubble using Screener or equivalent screening equipment.

18. Incoming Waste Documentation

Dry Excess Soil

18.1 Prior to accepting any Dry Excess Soil at the Site, the Owner shall acquire from the source site owner/generator, the documentation that contains information on the source site and the characterization information of the incoming Dry Excess Soil to confirm that the Dry Excess Soil meets waste type approved in Condition 13.1(a) and it shall:

- (a) be reviewed and deemed acceptable by Trained Person;
- (b) be for the Dry Excess Soil from each source site;
- (c) include the following source site information:
 - i. the generator's name and/or Owner name, address and contact information;
 - ii. the source site location;
 - iii. current source site's activities and land use;
 - iv. past source site's activities and land use, if known. Including identifying any certain or likely Potentially Contaminating Activity; and
 - v. estimated quantity of the Dry Excess Soil to be received at the Site from that source site.

18.2 Dry Excess Soil may be received at the Site with incomplete characterization documentation or without the required characterization documentation, provided that the Dry Excess Soil is expected to be a solid non-hazardous waste, if one of the following requirements is complied with:

- (a) the incoming Dry Excess Soil shall be segregated from all other Dry Excess Soil and waste until the complete documentation is promptly (within 72 hours) provided by the source site owner/generator, received by the Owner and deemed acceptable by the Trained Person; or
- (b) the incoming Dry Excess Soil shall be segregated from all other Dry Excess Soil, and wastes until the Dry Excess Soil is characterized within 10 business days at the Site in accordance with Section B, Part I of the Soil Rules.

18.3. All applicable analytical results shall be from a laboratory service provider accredited by a Canadian Association for Laboratory Accreditation or equivalent.

18.4. The documentation required in 18.1 shall also include sampling and testing protocols, methods and analytical results to demonstrate that the Dry Excess Soil is a solid non-hazardous waste. As

a minimum, the characterization documentation shall include:

- (a) the results of any Phase I Environmental Site Assessment (ESA) and Phase II ESA undertaken for the source site in accordance with the Ministry's requirements under Ontario Regulation 153/04 and in accordance with sections 1 to 4 of Section B of Part I of Soil Rules;
- (b) the following characterization results:
 - i. slump from the Slump Test, if the Dry Excess Soil has a high moisture content;
 - ii. characterization to demonstrate that the Dry Excess Soil is a non-hazardous waste which was done in accordance with the following:
 - A. sampling and testing results to demonstrate that the Dry Excess Soil does not trigger any criteria from the hazardous waste definition from Reg. 347, including TCLP analysis results, from samples:
 - 1. collected in accordance with the procedures set out in the Ministry's document entitled "Principles of Sampling and Analysis of Waste for TCLP under Reg. 347", as amended; and
 - 2. tested for contaminants of potential concern identified by Qualified Person and determined from the information contained in the general documentation required in Condition 18.1 and analysed with methods in accordance with the Ministry-published methods and as recommended by the accredited laboratory service provider.

Liquid Excess Soil

18.5 Prior to accepting any Liquid Excess Soil at the Site, the Owner shall ensure that documents are obtained from each source site/generator delivering waste to the Site that contains following information at a minimum:

- (a) the source site/generator location; current source site/generator activities and land use, including details of any certain or likely Potentially Contaminating Activity;
- (b) past source site/generator activities and land use, including details of any certain or likely Potentially Contaminating Activity;
- (c) a list of all certain or likely spilled materials and clean-up materials present in the Liquid Excess Soil if the Liquid Excess Soil is from an emergency response location; and
- (d) the estimated quantity of Liquid Excess Soil to be received at the Site.

19. Soil Management

Dry Excess Soil

- 19.1 The Owner must ensure that all of the residual waste generated at the Site is disposed in accordance with Regulation 347 requirements.
- 19.2 Dry Excess Soil shall be stored indoor in clearly marked designated areas as per the chemical quality of the Dry Excess Soil received.
- 19.3 Dry Excess Soil that has been sampled and analyzed must be kept segregated based on the table of Excess Soil Standards that the Dry Excess Soil meets. Blending or mixing or co-mingling of Dry Excess Soil of different chemical quality either originated from the same project area or different project areas is not permitted with the exception of requirements outlined in Condition 17.1.
- 19.4 Source characterized Dry Excess Soil or uncharacterized Dry Excess Soil that is characterized at the Site that does not meet the waste acceptance criteria outlined in Condition 13 shall either not be accepted at the Site or, if received, must be removed from the Site within 72 hours of its receipt.
- 19.5 The height of Dry Excess Soil or waste containing dry non-excess soil stockpile shall not exceed 3 m.
- 19.6 Dry Excess Soil shall be stored in dedicated storage areas shown on Figure 3 of the Design and Operations Report included as Item 2 in Schedule "A".
- 19.7 All storage areas at the Site shall be constructed and maintained as follows:
 - (a) The walls of each storage area shall be constructed of brick, block, concrete, or other rigid inert material(s) able to contain the waste placed in it.
 - (b) Each storage area shall have trench drain which is connected to a storage tank to collect wastewater or contact stormwater or leachate generated within the waste storage area.
 - (c) The floor of each storage area shall be of engineered concrete so as to prevent exfiltration into the subsurface.
 - (d) Each waste storage area containing Dry Excess Soil (characterized and uncharacterized), Bioremediation Area, waste containing dry non-excess soil (road sweepings) and residual waste shall be clearly marked with a sign indicating the contents of the waste storage area. In either case, the contents of the storage area shall be described in terms of the following:
 - i. soil chemical quality;

- ii. the source site(s) of the soil in the bunker;
- iii. Estimated quantity; and
- iv. Un-characterized soils and the source.

Waste containing dry non-excess soil

- 19.8 The uncharacterized and unprocessed waste containing dry non-excess soil from different project areas must be kept indoor in segregated areas.
- 19.9 The Owner shall chemically characterize Dry Excess Soil recovered from the processing of waste-containing dry non-excess soil in accordance with Section B, Part I of the Soil Rules within 7 days after processing of waste containing dry non-excess soil is complete. Any recovered soils that do not meet the Dry Excess Soil requirements outlined in Condition 13.1(a) shall be removed within 72 hours from the Site .
- 19.10 Processed Dry Excess Soil recovered from processing of waste containing dry non-excess soil shall be stored in dedicated storage area based on their chemical quality. Processed Dry Excess Soil of similar chemical quality, meaning meeting the same soil reuse standards for the same land use, may be mixed or blended. Mixing or blending or co-mingling of Processed Dry Excess Soil of different chemical quality is not permitted.
- 19.11 Processed Dry Excess Soil shall be slump tested as per Soil Rules to ensure the Processed Dry Excess Soil meet the dry soil requirements outlined in the Soil Rules.
- 19.12 Residual waste generated from the processing of waste-containing dry non-excess soil shall be stored as per Condition 16.4.

20. Bioremediation

- 20.1 Prior to the construction of Biopiles for Bioremediation, geochemical screening of Dry Excess Soil that is subject to Bioremediation shall be carried out by measuring oxygen level, moisture content, pH, temperature, nutrients and indigenous bacterial population in order to establish baseline conditions and to optimize the Bioremediation design to support or promote or enhance Bioremediation.
- 20.2 The maximum height for all Bioremediation Biopiles and the Processed Soil storage piles shall not exceed 3 metres.
- 20.3 No Bioremediation materials can be added to the Dry Excess Soil other than those approved in Condition 20.5 and 20.6.
- 20.4 The Owner shall ensure that the Processed Dry Excess Soil piles that meet different quality

criteria are segregated to avoid mixing of Processed Dry Excess Soil of different quality.

20.5 The following Amendment Materials are approved for use in the Bioremediation process at the Site to achieve desired porosity of the Mix:

- (a) straw;
- (b) wood and woodwaste chips and other wood and woodwaste products, excluding painted wood, chipped treated wood or chipped laminated wood or painted woodwaste, chipped treated woodwaste or chipped laminated woodwaste; and
- (c) peat moss

20.6 The following Bioremediation materials are approved for receipt, temporary storage and use at the Site:

- (a) Biostimulation Compounds;
- (b) Bioaugmentation Compounds approved by Health Canada; and
- (c) Amendment Materials.

20.7 For Condition 20.6 (a) and (b), Safety Data Sheets (SDS) for Bioaugmentation Compounds shall be provided to the District Manager for at least 4 weeks prior to the use of Biostimulation Compounds and Bioaugmentation Compounds.

20.8 The Mix undergoing Bioremediation shall be wetted to maintain the optimal moisture range of 10-25 percent by weight, unless Trained Personnel determines an alternative optimal moisture range required to Bioremediate the Mix and retains written justification for the change from the range required in this Condition, in accordance with the records keeping requirements in Condition 32.

20.9 Only clean water shall be used to add moisture to the Mix undergoing Bioremediation.

20.10 The Mix undergoing Bioremediation in the Biopiles shall be aerated as required to maintain a target oxygen level of 15% to ensure aerobic conditions within the Mix.

20.11 The Mix undergoing Bioremediation shall be maintained at the optimal pH level range of 6-8, unless Trained Personnel determines an alternative optimal pH level required to Bioremediate the Mix and retains written justification for the change from the range required in this Condition, in accordance with the records keeping requirements in Condition 32.

21. Bioremediation Monitoring

21.1 During the normal operating hours, a Trained Person or Qualified Person shall monitor the

following Bioremediation process parameters in Biopiles:

- (a) temperature;
- (b) oxygen level;
- (c) moisture level;
- (d) pH;
- (e) carbon dioxide level; and
- (f) total residual petroleum hydrocarbons.

21.2 The readings shall be taken, as a minimum, at five (5) representative locations, one (1) metre from the surface of the Biopile.

21.3 The readings shall be taken, as a minimum, at five (5) locations representing the full depth profile of the Biopile, starting at the location one (1) metre from the surface of the Biopile.

21.4 The monitoring shall be carried out on a weekly basis, unless Qualified Person determines an alternative monitoring frequency and retains written justification for the change as part of the monitoring records required by Condition 32.

22. Outgoing Dry Excess Soil Criteria

22.1 No Dry Excess Soil and Processed Dry Excess Soil shall leave the Site for reuse unless the Owner shall complete the following prior to shipping for reuse from the Site:

- (a) the soil characterization is carried out by, or under the supervision of, a Qualified Person, and all characterization documentation is prepared by a Qualified Person;
- (b) the soil is tested using the TCLP test, and any other analytical results required to confirm that the soil not a hazardous waste as defined in Regulation 347;
- (c) the soil is tested using the Slump Test;
- (d) the soil is sampled in accordance with the stockpile sampling frequency set out in paragraph 2(3)16 of Section B of Part I of the Soil Rules for the contaminants listed in paragraph 2(3)14 of Section B of Part I of the Soil Rules, and that the samples are handled, stored and analyzed in accordance with subsection 2(4) in Section B of Part I of the Soil Rules;
- (e) all analysis of soil samples is carried out by an accredited laboratory (Canadian Association for Laboratory Accreditation or equivalent).

22.2 For the purpose of compliance with Condition 22.1(d), discrete samples of Dry Excess Soil and Processed Dry Excess Soil shall be collected and analysed, at minimum, for the following parameters:

- (a) metals;
- (b) hydride-forming metals;
- (c) petroleum hydrocarbons (PHCs) [F1 to F4];
- (d) Benzene, toluene, ethylbenzene, xylene (BTEX);
- (e) Sodium adsorption ratio (SR) and electrical conductivity (EC);
- (f) Volatile organic compounds (VOC); and
- (g) Semi-volatile organic compounds (SVOC) including polychlorinated biphenyls (PCB); and
- (h) leachate analysis for certain contaminants as outlined in subsection 2 (5) in Section B of PART I of Soil Rules.

22.3 The Owner shall maintain a Quality Assurance/Quality Control (QA/QC) program for sampling and analysis of wastes, as required by this Approval, and shall make the results of the QA/QC program, including all analyses carried out by an accredited laboratory service provider, available for inspection upon request by the District Manager, the Director and any Provincial Officer.

23. Dry Excess Soil Reuse

23.1 The Owner shall ensure that no Dry Excess Soil and Processed Dry Excess Soil is transferred from the Site except to be deposited at a property or a site in accordance with one of the following criteria:

- (a) to an approved waste disposal facility permitted to accept soil under Part V of the EPA;
- (b) to an approved waste disposal site for use as daily cover or intermediate cover in accordance with the requirements of the Environmental Compliance Approval for the receiving site;
- (c) to a receiving property that has been assessed by a Qualified Person who confirms that the receiving site has a fill management plan and that the soil quantity and quality is acceptable for the intended receiving property such that it will not cause an adverse effect to human health or the environment;
- (d) to a receiving property that has site specific standards developed in a risk assessment as outlined in Ontario Regulation 153/04 made under the EPA, and which the soil meets; and
- (e) the Owner shall ensure that for any soil that is to be transferred to a receiving property to be used as clean fill, a copy of the analytical results are forwarded to the receiving property.

- 23.2 Dry Excess Soil and Processed Dry Excess Soil to be sent off-site for beneficial reuse as described Section 5(1)3 in Ontario Regulation 406/19 shall only be sent off-site for reuse in accordance with Section 3 of Ontario Regulation 406/19 and the Soil Rules. All other Dry Excess Soil and Processed Dry Excess Soil shall only be transferred off-site to a waste disposal site that is approved to accept that type of material in accordance with the Environmental Compliance Approval for that site, or to a location not required to obtain an Environmental Compliance Approval to manage that material.
- 23.3 Rock that meets the Regulation 347 inert fill criteria set out in, meaning it does not contain putrescible materials or soluble or decomposable chemical substance, shall be sent out off-site for reuse or processing in accordance with Regulation 347 requirements.
- 23.4 Rock (having a same meaning as in Ontario Regulation 406/19) that does not meet the definition of inert fill set out in Reg. 347 shall only be transferred off-site to a waste disposal site that is approved to accept that type of material in accordance with the Environmental Compliance Approval for that site, or to a location not required to obtain an Environmental Compliance Approval to manage that material.
- 23.5 Before shipping any Dry Excess Soil or Processed Dry Excess Soil or Rock from the Site to a receiving property (that is, a property other than a waste disposal site approved under Part V of the EPA), the Owner shall require the following:
- (a) a record of the receiving property owner's name and/or Owner name, contact information, receiving site address, any correspondence with the receiving property, and the quantity of soil or soil-like waste or Rock being sent to the receiving property;
 - (b) written confirmation from the Qualified Person that they:
 - i. have assessed the receiving property;
 - ii. have identified the applicable soil quality standards for the receiving property as required by the local municipality, the local Conservation Authority, any applicable provincial/federal legislation, or (in the absence of such requirements) as recommended by the Qualified Person;
 - iii. have reviewed the test results for the soil and agree that the testing is sufficient to establish compatibility of the waste with the receiving property and that the waste meets the criteria for the receiving waste; and
 - iv. agree that the soil quantity and quality meet the requirements of the fill management plan for the receiving property.
 - (c) written confirmation from the receiving property owner that the soil quality and quantity to be provided is appropriate to the receiving property based on the recommendation of the

Qualified Person, and that the receiving property agrees to accept it.

23.6 Dry Excess Soil, Rock and Processed Dry Excess Soil can only be transferred to a pit or quarry for pit rehabilitation under the Aggregate Resources Act, R.S.O. 1990, c.A.8 only if:

- (a) a Qualified Person has confirmed, in writing, that the concentrations of constituent contaminants of the soil and Rock, and the deposition of the soil or Rock at the pit or quarry, are in accordance with the Aggregate Resources Act, R.S.O. 1990, c.A.8 and the regulations, the site plan and the conditions of the licence or permit under the Aggregate Resources Act , R.S.O. 1990, c.A.8; and
- (b) Qualified Person has determined it is appropriate to bring the soil or Rock to the pit or quarry, and this determination was done with consideration given to the contaminant volumes and loading, the impacts on the existing conditions at the pit or quarry, and the introduction of new contaminants to the pit or quarry.

24. Operations Manual

24.1 With in 3 months of the issuance of this Approval, the Owner shall develop and submit to the District Manager an Operations Manual for the Site. As a minimum, the Operations Manual must contain the following:

- (a) outline of the responsibilities of the Site personnel;
- (b) personnel training protocols;
- (c) Site operating procedures including but not limited to,
 - i. the waste and the reagents and amendments receiving, unloading/loading, screening, handling and storage procedures and the Bioremediation processing procedures;
 - ii. waste mixing, bulking and blending procedures;
- (d) sampling, testing, monitoring and recording procedures as required by this Approval;
- (e) required data recording procedures;
- (f) emergency response procedures including an outline of the responsibilities of Site personnel including roles and responsibilities during emergency situations, exit locations and evacuation routing, and locations of relevant equipment available for handling of the emergency situations;
- (g) the contingency plans for the Site;

- (h) equipment and Site inspection procedures, as required by this Approval;
- (i) nuisance impact control and housekeeping procedures, as required by this Approval; and
- (j) the procedures for handling and recording complaints as described in this Approval.

24.2 A copy of this Operations Manual shall be kept at the Owner's office, must be accessible to Site personnel at all times and must be updated, as required.

25. Design and Operations Report

25.1 The Design and Operations Report shall be kept up-to-date, with any changes to the Design and Operations Report requiring approval being submitted to the Director for approval prior to implementation.

23.2 Changes to the Site's operations that:

- (a) do not require an amendment to this Approval under Section 27 of the EPA shall be recorded in a revisions tracking log in the Design and Operations Report and submitted to the District Manager for record keeping; and
- (b) require an amendment to this Approval under Section 27 of the EPA shall not be implemented on-site or included in the Design and Operations Report until they have been approved by the Director.

25.3 An updated Design and Operations Report, including the revisions tracking log noted above, shall be submitted with all future Environmental Compliance Approval applications for the Site.

25.4 The Design and Operations Report shall be retained at the Site and available for inspection by a Provincial Officer upon request.

26. Nuisance Control

26.1 The Owner shall operate and maintain the Site such that the dust, odours, vectors, birds, litter, vibration, noise and traffic do not create a nuisance.

26.2 The Owner shall implement a litter control plan to minimize and control litter at the Site.

26.3 If at any time odours are generated at the Site resulting in complaints, the Owner shall take appropriate remedial actions immediately to eliminate the cause of the problem. Appropriate measures may include the removal of waste from the Site and temporary stoppage of all operations until the problem has been rectified and measures have been undertaken to prevent future occurrence.

26.4 The Owner shall ensure that any waste causing a nuisance or Adverse Effect shall be removed

from the Site no later than 24 hours of the commencement of the nuisance or Adverse Effect.

- 26.5 The Owner shall ensure that there is no queuing or parking of trucks that are waiting to enter this Site on any roadway that is not a distinct part of this Site.
- 26.6 The Owner shall ensure that vehicles leaving this Site do not drag dirt and/or other material that may become a contaminant or a nuisance onto public roads.
- 26.7 The Owner shall ensure the following to minimize impacts from wind-blown dust:
- (a) cloth barrier material is attached to all perimeter fencing, or other barriers such as concrete blocks or acoustic barriers are employed in a manner that prevents off-site impacts from wind-blown dust;;
 - (b) stockpiles are wetted as necessary, using water from the municipal water supply;
 - (c) water from the municipal water supply is used as necessary during any loading or unloading operation; and
 - (d) the Site is wet-swept clean twice per day using water when the Site is operational.

27. Stormwater Management

27.1 The Owner shall manage all discharges from this Site, including sanitary and stormwater run-off, in accordance with applicable municipal, provincial and/or federal legislation, regulation and by-laws.

27.2 The Owner shall ensure that:

- (a) No process water shall be loaded onto hydrovac trucks for off-Site reuse or for on-Site reuse for dust suppression unless the treated decant effluent has been sampled and analyzed for metals, volatile organic compounds (VOCs), petroleum hydrocarbon (PHCs), and polycyclic aromatic hydrocarbons (PAHs), and the analytical results meet the Table 2, of the "Soil, ground water and sediment standards for use under Part XV.1 of the Environmental Protection Act, dated April 15, 2011";
- (b) Following completion of the chemical testing required under Condition 27.2(a), the treated decant effluent storage tank shall not be topped up until all stored treated decant effluent has been completely reused or otherwise removed from the storage tank;
- (c) No process water shall be discharged, directly or indirectly, to any waterbody or to any other part of the natural environment, or otherwise in a manner that requires an approval under section 53 of the Ontario Water Resources Act, unless such approval is in effect for the Site; and

- (d) All process water shall otherwise be managed in accordance with all applicable municipal, provincial, and federal requirements, and may include discharge to a sanitary sewer system, where permitted by the local municipality, or off-Site disposal at a facility authorized to receive such material.

27.3 The treated decant effluent chemical quality monitoring requirements set out in Condition 27.2 may be revised or amended upon submission of a monitoring report by the Owner and following review and written approval by the District Manager of the Barrie District Office. Upon receipt of such written approval, the Owner shall apply to the Director for an amendment to this Approval, who may impose restrictions on the source areas of the incoming Liquid Excess Soil.

27.4 The decanted effluent chemical quality monitoring report referenced in Condition 27.3 shall include, at a minimum:

- (a) Two (2) consecutive years of continuous treated decant effluent water quality monitoring data collected during the reporting period;
- (b) Information identifying the source areas from which Liquid Excess Soil was received during the reporting period; and
- (c) A chemical data analysis, including interpretation of trends, variability, and any implications for effluent quality and potential impacts to the natural environment.

28. Complaints

28.1 If at any time, the Owner receives complaints regarding the operation of the Site, the Owner shall respond to these complaints according to the following procedure:

- (a) the Owner shall 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, address and the telephone number of the complainant if the complainant will provide this information; and
 - (iii) the time and date of the complaint;
- (b) the Owner, upon notification of the complaint, shall initiate appropriate steps to determine all possible causes of the complaint, proceed to take the necessary actions to eliminate the cause of the complaint and forward a formal reply to the complainant; and
- (c) the Owner shall complete and retain on-site a report written within one (1) week of the complaint date, listing the actions taken to resolve the complaint and any recommendations for remedial measures, and managerial or operational changes to reasonably avoid the

recurrence of similar incidents.

29. Spill Prevention, Control & Countermeasures Plan

- 29.1 The emergency response and contingency plan provided in Appendix E of the Design and Operations Report included as Item 2 of this Approval shall be kept up to date, and a copy shall be retained and accessible to all staff at all times.
- 29.2 The equipment, materials and personnel requirements outlined in the emergency response plan shall be immediately available on the Site at all times. The equipment shall be kept in a good state of repair and in a fully operational condition.
- 29.3 Each staff member that operates the Site shall be fully trained in the use of the equipment they are required to operate under the emergency response plan and in the procedures to be employed in the event of an emergency.
- 29.4 The Owner shall immediately take all measures necessary to contain and clean up any spill (as defined in the EPA) which may result from the operation of this Site and immediately implement the emergency response plan if required.
- 29.5 All spills, as defined in the EPA, shall be immediately reported to the Ministry's Spill Action Centre at 1-800-268-6060.

30. Staff Training

- 30.1 The Owner shall develop and implement a training plan specific to the Site to ensure that all employees that operate the Site or carry out any activity required under this Approval are trained in its operation.
- 30.2 (a) The training plan shall require and ensure, through proper written records, that all persons directly involved with activities relating to the Site have been trained with respect to:
 - (i) an outline of the responsibilities of the Site personnel;
 - (ii) personnel training protocols;
 - (iii) any environmental concerns pertaining to the waste and Dry and Liquid Excess Soil accepted at the Site;
 - (iv) occupational health and safety concerns pertaining to the waste and Dry and Liquid Excess Soil received;
 - (v) operation and management of the Site, or area(s) within the Site, in accordance with the specific job requirements of each individual;

- (vi) proper receiving and recording procedures (including recording procedures of wastes which are refused at the Site);
- (vii) proper storage, handling, sorting and shipping procedures;
- (viii) spill prevention, control & countermeasures plan;
- (ix) inspection procedures, nuisance impact control procedures and record keeping procedures;
- (x) procedures for recording and responding to public complaints.

(b) The Owner shall ensure that Site personnel who oversee operations at the Site are trained, and receive annual refresher training in:

- (i) relevant waste management legislation, including but not limited to Regulation 347;
- (ii) terms, conditions and operating requirements of this Approval.

30.3 The Owner shall ensure that Trained Personnel are on duty at all times when the Site is open to carry out any activity required under this Approval.

31. Site Inspections

31.1 An inspection of the entire Site and all equipment on the Site shall be conducted two times within 24 hours on each day the Site is in operation to ensure that:

- (a) the Site is secure;
- (b) that the operation of the Site is not causing any nuisances;
- (c) that the operation of the Site is not causing any adverse effects on the environment; and
- (d) that the Site is being operated in compliance with this Approval.

31.2 Any deficiencies discovered as a result of an inspection shall be remedied immediately, including temporarily ceasing operations at the Site if needed.

32. Record Keeping

1. The Owner shall retain all records (electronic or written form) required by this Approval for a minimum of seven (7) years.
2. All records generated as required by this Approval shall include a date of record and the name

and signature of the person completing the report.

Daily Activities

3. The Owner shall maintain a written or digital record of daily activities undertaken at the Site. All measurements shall be recorded in consistent metric units of measurement. The record shall include, as a minimum, the following information:
 - (a) date of receipt and the name of the Dry Excess Soil and Liquid Excess Soil generator, source site location, land/use of the source site, and the quantity (tonnage and number of trucks) of the Dry Excess Soil and Liquid Excess Soil received;
 - (b) results of the required characterization of the incoming Dry Excess Soil and Liquid Excess Soil;
 - (c) date, quantity, type, quality (including the analytical data from any compliance testing) and the destination of the Dry Excess Soil or Processed Dry Excess Soil destined for transfer off-Site;
 - (d) the Dry Excess Soil processing activities undertaken at the Site, including the amounts of reagents, amendments and Biostimulation and Bioaugmentation Compound(s) used in the Bioremediation process and the details of the source(s) of the Dry Excess Soil combined to formulate each Bioremediation Biopile;
 - (e) date, quantity, type, and the destination of the total Residual Waste, transferred from the Site for final disposal;
 - (f) date, quantity, type, quality (including the analytical data from any compliance testing, if applicable) and the destination of the rejected waste transferred off-Site and the reason for rejection;
 - (g) housekeeping activities, including wetting of the Biopiles and/or storage stockpiles for dust control and the type of material used and road cleaning activities and other dust mitigation measures;

Inspections and Maintenance

4. The Owner shall maintain a written or digital record of inspections and maintenance as required under this Approval. The record shall include, as a minimum, the following:
 - (a) the name and signature of person that conducted the inspection;
 - (b) the date and time of the inspection;

- (c) the list of any deficiencies discovered;
- (d) the recommendations for remedial action;
- (e) the date, time and description of actions taken; and
- (f) all records on the maintenance, repair and inspection of the equipment.

Personnel Training

5. The Owner shall maintain a written or digital record of training as required as required under this Approval. The record shall include, as a minimum, the following:
 - (a) date of training;
 - (b) name and signature of person who has been trained; and
 - (c) description of the training provided.

Sampling and Testing Records

6. The Owner shall establish and maintain a written or digital record of all sampling and testing activities at the Site as required under this Approval. This record shall include, as a minimum, the following information:
 - (a) Waste type sampled, number of samples, sample collection locations and volume collected;
 - (b) day and time of collection;
 - (c) sample handling procedures;
 - (d) name of the person undertaking the sampling;
 - (e) parameters tested for and the results;
 - (f) name of the laboratory facility conducting the testing, if applicable; and
 - (g) conclusions drawn with respect to the results of the testing.

Monitoring Records

7. The Owner shall establish and maintain a written or digital record of all monitoring activities at the Site as required under this Approval.

Complaints Response Records

8. The Owner shall establish and maintain a written or digital record of all complaints and the responses as required under this Approval.

33. Annual Report

33.1 By March 31 of each year, the Owner shall prepare and submit to the District Manager a written report for the previous calendar year, and the first such report is due by March 31, 2028. The report shall include, at a minimum, the following information:

- (a) a detailed monthly summary reconciling all wastes and Dry and Liquid Excess Soil received and processed at the Site and all residual wastes and processed wastes transferred from the Site;
- (b) annual amount and quality of the Dry Excess Soil intended for Bioremediation;
- (c) annual amount and quality of the Dry Excess Soil intended for transfer off-Site;
- (d) annual amount and quality of the tested Dry Excess Soil transferred from the Site and its final destination(s);
- (e) number of Bioremediation Biopiles and the status of processing at the end of the operating year;
- (f) a summary of waste loads refused including the generator of the load, the licensed hauler of the load if the generator can not be determined, the date of refusal and reason for refusal of the load;
- (g) any environmental and operational problems, that are likely to negatively impact the environment, encountered during the operation of the Site and during the facility inspections and any mitigative actions taken;
- (h) a summary of complaints received and the actions taken to mitigate the issue associated with the complaint;
- (i) a summary of any changes to the Design and Operations Report that have been approved by the Director since the last annual report;
- (j) a summary of any changes to the Design and Operations Report;
- (k) a review of the financial assurance in accordance with Condition 7.2;
- (l) any recommendations to minimize environmental impacts from the operation of the Site

and to improve Site operations and monitoring programs in this regard; and

- (m) summary statement as to compliance with all Conditions of this Approval and with the inspection and reporting requirements of the Conditions herein.

34. Closure Plan

- 34.1 (a) The Owner shall submit a written Closure Plan for the Site to the District Manager no less than four (4) months prior to planned closure of the Site. This plan must include, as a minimum, a description of the work that will be done to facilitate closure of the Site and a schedule for completion of that work.
- (b) Within ten (10) days after closure of the Site, the Owner shall notify the Director and the District Manager, in writing, that the Site is closed and that the decommissioning activities have been completed.

Schedule "A"

This Schedule "A" forms part of Environmental Compliance Approval.

1. Environmental Compliance Approval Application, dated October 30, 2025.
2. Design & Operations Report for Materials Management and Transfer Facility, Revision 4.1, Cambium Inc., dated March 24, 2026.
3. Financial Assurance Estimate - Materials Management and Transfer Facility, Revision 4.2, Cambium Inc., dated March 24, 2026.

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

Conditions 1, 4, 5, and 9 are to clarify the legal rights and responsibilities of the Owner under this Approval.

Conditions 2 are to ensure that the Site is designed, operated, monitored and maintained in accordance with the application and supporting documentation submitted by the Owner, and not in a manner which the Director has not been asked to consider.

Conditions 3 are to clarify how to interpret this Approval in relation to the application and supporting documentation submitted by the Owner.

Condition 6.1 is to ensure that the Site is operated under the corporate name which appears on the application form submitted for this approval and to ensure that the Director is informed of any changes.

Condition 6.2 is to restrict potential transfer or encumbrance of the Site without the approval of the Director. Any transfer of encumbrance can be made only on the basis that it will not endanger compliance with this Approval.

Conditions 6.3 and 6.4 are to ensure that subsequent owners of the Site are informed of the terms and conditions of this Approval. This also applies to all supporting documentation listed in Schedule "A".

Condition 7 is included to ensure that sufficient funds are available to the Ministry to clean up the Site in the event that the Owner is unable or unwilling to do so.

Condition 8 is included to ensure that appropriate Ministry staff have ready access to the Site for inspection of facilities, equipment, practices and operations required by the conditions in this Approval. This condition is supplementary to the powers of entry afforded a Provincial Officer pursuant to the EPA, the OWRA or the PA, the NMA, or the SDWA.

Condition 10 is included to specify the approved areas from which waste may be accepted at the Site, based on the Owner's application and supporting documentation.

Condition 11 is to specify the hours of operation for the Site based on the Owner's application and supporting documentation.

Condition 12.1 is to ensure that emergency responders, users of the Site and the public have the necessary information regarding Site operations and in the event of an emergency or complaint.

Condition 12.2 is to ensure that the Site is secure when unattended to prevent vandalism or theft.

Condition 13 is included to specify the type of waste the Site is approved to receive.

Condition 14 is included to specify quantities of waste received at the Site.

Condition 15 is to ensure that waste storage is done in a manner and duration which conforms with municipal zoning bylaws and which does not result in a nuisance or a hazard to the health and safety of the environment or people.

The reason for Condition 16 is to ensure that all wastes received at the Site are received by properly Trained Personnel to ensure they are managed in a manner that protects the health and safety of people and the environment.

Conditions 17, 24, 26 and 27 are to ensure that the Site is operated in a manner which does not result in a nuisance or a hazard to the health and safety of the environment or people.

Condition 18 are included to ensure incoming waste is properly classified and specify sampling and testing requirements of the incoming waste.

The reasons for Condition 19 is to specify requirements for the management of incoming Dry Excess Soil and waste containing dry non-excess soil based on the Owner's application and supporting documentation and to ensure that the Site is operated in a manner which does not result in a nuisance or a hazard to the health and safety of the environment or people.

Condition 20 and 21 are included to approve and set out the framework for undertaking remediation of PHC contaminated soils and monitoring the effectiveness of the Bioremediation in Biopiles.

The reasons for Condition 22 is to ensure that all processed material is tested and to ensure that any processed material is only sent off-site for reuse to an appropriate receiving facility.

The reasons for Condition 23 is to ensure that processed material is only sent off-site for reuse to an appropriate receiving facility.

The reason for Conditions 25 is to ensure that the Design and Operations Report is maintained, up-to-date and available at the Site at all times and to ensure that any changes to the Report are done with prior approval from the Ministry.

The reason for Condition 28 is to ensure that any complaints regarding Site operations at the Site are responded to in a timely manner.

The reasons for Condition 29 is to ensure that an emergency response plan and a spill management plan are developed and maintained at the Site, and that staff are properly trained in the operation of the equipment used at the Site and emergency response procedures.

The reason for Condition 30 is to ensure that the Site is operated by properly Trained staff in a

manner which does not result in a hazard or nuisance to people or the environment.

The reason for Condition 31 is to ensure that inspections of all Site grounds and infrastructure are carried out on a regular basis, and that detailed records of Site inspections are recorded and maintained for compliance and information purposes.

The reason for Condition 32 is to provide for the proper assessment of effectiveness and efficiency of site design and operation, their effect or relationship to any nuisance or environmental impacts, and the occurrence of any public complaints or concerns. Record keeping is necessary to determine compliance with this Approval, the EPA and its regulations.

The reason for Condition 33 is to ensure that regular review of site development, operations and monitoring data is documented and any possible improvements to site design, operations or monitoring programs are identified. An annual report is an important tool used in reviewing site activities and for determining the effectiveness of site design.

The reason for Conditions 34 is to ensure that the Site is closed in accordance with Ministry standards and to protect the health and safety of the public and the environment.

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 31st day of March, 2026



Mohsen Keyvani, P.Eng.
Director
appointed for the purposes of Part II.1 of the
Environmental Protection Act

AQ/

c: District Manager, MECP Barrie
Gary Muloin CET and John Kaasalainen P. Eng.
John.Kaasalainen@cambium-inc.com, Cambium Inc.