

ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 8230-DRKRSV

Issue Date: April 7, 2026

Thomas Cavanagh Construction Limited
9094 Cavanagh Road
Ashton, Ontario
K0A 1B0

Site Location: Pakenham Quarry
Lot 27 and 26, Concession 9, Geographic Township of
McNab, County of Renfrew
Lot 1, 27 and 26, Concession 9
Town of Mississippi Mills, County of Lanark

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:

the establishment, use and operation of sewage works servicing approximately 69.2 hectares of existing Pakenham Quarry site located in the Township of McNab, Ontario, for the collection, transmission, treatment and disposal of process water effluent of up to 205 litres per second of quarry water, from dewatering activities and aggregate washing operations, discharging to roadside ditch, ultimately to Lake Madawaska, consisting of the following proposed Works:

Proposed Works:

- **Quarry Sump:** one (1) quarry dewatering sump located in the quarry extraction area, having permanent pool depth of 3.0 metres and 3.5 metres of total sump depth, along with having three following different configurations:
 - **configuration 1** - surface area of approximately 1,440 square metres, permanent pool volume of approximately 4,320 cubic metres, and approximately 5,040 cubic metres of total sump volume, complete with an appropriately sized submersible pumping arrangement having a maximum pump operating capacity of 50 Litres per second;
 - **configuration 2** - surface area of approximately 2,880 square metres, permanent pool volume of approximately 8,640 cubic metres, and approximately 10,080 cubic metres of total sump volume, complete with an appropriately sized submersible pumping

arrangement having a maximum pump operating capacity of 100 Litres per second; and

- **configuration 3** - surface area of approximately 5,904 square metres, permanent pool volume of approximately 17,712 cubic metres, and approximately 20,664 cubic metres of total sump volume, complete with an appropriately sized submersible pumping arrangement having a maximum pump operating capacity of 205 Litres per second;

including all other controls and appurtenances essential for the proper operation of the aforementioned Works;

all in accordance with the submitted application and supporting documents listed in Schedule A forming part of this Approval.

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

1. "Approval" means this entire Environmental Compliance Approval and any Schedules attached to it;
2. "Director" means a person appointed by the Minister pursuant to section 5 of the EPA for the purposes of Part II.1 of the EPA;
3. "District Manager" means the District Manager of the appropriate local District Office of the Ministry, where the Works are geographically located;
4. "EPA" means the *Environmental Protection Act*, R.S.O. 1990, c.E.19, as amended;
5. "Licensed Engineering Practitioner" means a person who holds a licence, limited licence or temporary licence under the *Professional Engineers Act*, R.S.O. 1990, c. P.28;
6. "Ministry" means the ministry of the government of Ontario responsible for the EPA and OWRA and includes all officials, employees or other persons acting on its behalf;
7. "Owner" means Thomas Cavanagh Construction Limited and its successors and assignees;
8. "OWRA" means the *Ontario Water Resources Act*, R.S.O. 1990, c. O.40, as amended;
9. "Proposed Works" means those portions of the Works included in the Approval that are under construction or to be constructed;
10. "Works" means the approved sewage works, and includes Proposed Works.

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. GENERAL PROVISIONS

1. The Owner shall ensure that any person authorized to carry out work on or operate any aspect of the Works is notified of this Approval and the terms and conditions herein and shall take all reasonable measures to ensure any such person complies with the same.
2. The Owner shall design, construct, operate and maintain the Works in accordance with the conditions of this Approval.
3. Where there is a conflict between a provision of any document referred to in this Approval and the conditions of this Approval, the conditions in this Approval shall take precedence.
4. The issuance of, and compliance with the conditions of 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, the obligation to obtain approval from the local conservation authority necessary to construct or operate the Works; or
 - b. limit in any way the authority of the Ministry to require certain steps be taken to require the Owner to furnish any further information related to compliance with this Approval.

2. CHANGE OF OWNER

1. The Owner shall notify the District Manager and the Director, in writing, of any of the following changes within thirty (30) days of the change occurring:
 - a. change of address of Owner;
 - b. change of Owner, including address of new owner;
 - c. change of 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;
 - d. change of name of the 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 Works, other than a change in ownership to the municipality, i.e. assumption of the Works, the Owner shall notify the succeeding

owner in writing of the existence of this Approval, and a copy of such notice shall be forwarded to the District Manager and the Director.

3. The Owner shall ensure that all communications made pursuant to this condition refer to the number of this Approval.

3. CONSTRUCTION OF PROPOSED WORKS

1. Upon the construction of the Works, the Owner shall prepare a statement, certified by a Licensed Engineering Practitioner, that the Works are constructed in accordance with this Approval, and upon request, shall make the written statement available for inspection by Ministry personnel.
2. Within one (1) year of the construction of the Proposed Works, a set of as-built drawings showing the Works “as constructed” shall be prepared. These drawings shall be kept up to date through revisions undertaken from time to time and a copy shall be retained at the Works for the operational life of the Works.
3. All Proposed Works in this Approval shall be constructed and installed and must commence operation within **five (5) years** of issuance of this Approval, after which time the Approval ceases to apply in respect of any portions of the Works not in operation. In the event that the construction, installation and/or operation of any portion of the Proposed Works is anticipated to be delayed beyond the time period stipulated, the Owner shall submit to the Director an application to amend the Approval to extend this time period, at least six (6) months prior to the end of the period. The amendment application shall include the reason(s) for the delay and whether there is any design change(s).

4. OPERATION AND MAINTENANCE

1. The Owner shall ensure that, at all times, the Works and the related equipment and appurtenances used to achieve compliance with this Approval are properly operated and maintained. Proper operation and maintenance shall include effective performance, adequate staffing and training, including training in all procedures and other requirements of this Approval and the OWRA and relevant regulations made under the OWRA, process controls and alarms and the use of process chemicals and other substances used in the Works.
2. The Owner shall ensure that at all times, the Works and related equipment and appurtenances which are installed or used to achieve compliance with this Approval are properly operated and maintained. The Owner shall also ensure that all monitoring programs and maintenance schedules for the Works are complied with.
3. The Owner shall prepare/update the operations manual for the Works within **six (6) months** of completion of construction of the Proposed Works, that includes, but not

necessarily limited to, the following information:

- a. operating procedures for the Works under Normal Operating Conditions;
 - b. inspection programs, including frequency of inspection, for the Works and the methods or tests employed to detect when maintenance is necessary;
 - c. repair and maintenance programs, including the frequency of repair and maintenance for the Works;
 - d. procedures for the inspection and calibration of monitoring equipment;
 - e. a spill prevention control and countermeasures plan, consisting of contingency plans and procedures for dealing with equipment breakdowns, potential spills and any other abnormal situations, including notification of the Spills Action Centre (SAC) and District Manager;
 - f. procedures for receiving, responding and recording public complaints, including recording any followup actions taken.
4. The Owner shall maintain an up to date operations manual and make the manual readily accessible for reference at the Works for the operational life of the Works. Upon request, the Owner shall make the manual available to Ministry staff.
 5. The Owner shall, upon identification of any spill, bypass or loss of any product, by-product, intermediate product, oil, fuel, solvent, waste material or any other polluting substance into the environment, take immediate action to prevent the further occurrence of such loss and prevent the substance from entering the quarry sump.
 6. During the period when aggregate washing is occurring, the Owner shall undertake monthly visual inspections of the Works for potential spills, structural integrity of the perimeter containment berms and accumulation of sediment in the Works and undertake corrective measures, if necessary, to ensure continued suspended solids removal performance of the Works, with results recorded in a log book.
 7. The Owner shall periodically visually monitor the amount of sediment accumulating in the sump, to ensure continued suspended solids removal performance of the quarry sump, with results recorded in a log book. No sediment shall be used on Site for rehabilitation without complying with all applicable laws in place at the time of reuse.
 8. The Owner shall ensure that any water discharged to the natural environment does not result in scouring, erosion or physical alteration of stream channels or banks and that there is no flooding in the receiving area or water body, downstream water bodies, ditches or properties caused or worsened by the discharge.
 9. The initial discharge of water should be to a well vegetated area to promote infiltration

wherever possible.

10. The Owner shall maintain a logbook to record the results of these inspections and any cleaning and maintenance operations undertaken, and shall keep the logbook at the Owner's office for the operational life of the Works and be made available for Ministry staff upon request. The logbook shall include the following:
 - a. the name of the Works;
 - b. the name of the inspector who conducted each inspection;
 - c. the date and results of each inspection, description of maintenance and cleaning, including an estimate of the quantity of any materials removed and method of clean-out of the Works;
 - d. the date measurement of sediment was undertaken, the amount of sediment measured, if sediment removal was undertaken and where any removed sediment was disposed.
11. The Owner shall retain for a minimum of **five (5) years** from the date of their creation, all records and information related to or resulting from the operation and maintenance activities required by this Approval.

5. EFFLUENT VISUAL OBSERVATIONS

1. Notwithstanding any other Condition in this Approval, the Owner shall ensure that the effluent from the Works is essentially free of floating and settleable solids and does not contain oil or any other substance in amounts sufficient to create a visible film, sheen, foam or discolouration on the receiving waters.

6. EFFLUENT LIMITS

1. The Owner shall design, construct and operate the Works such that the concentrations of the materials listed as effluent parameters in the effluent limits table in **Schedule B** are not exceeded in the effluent from the Works.

7. MONITORING AND RECORDING

1. The Owner shall, upon commencement of operation of the Sewage Works, carry out a monitoring program, and all samples and measurements taken for the purposes of this Approval are to be taken at a time and in a location characteristic of the quality and quantity at the respective sampling point over the time period being monitored.
2. Samples shall be collected and analyzed at the following sampling point(s), at the sampling frequencies and using the sample type specified for each parameter listed in the

monitoring table in Schedule B.

3. The methods and protocols for sampling, analysis, toxicity testing, and recording shall conform, in order of precedence, to the methods and protocols specified in the following:
 - a. the Ministry's publication "Protocol for the Sampling and Analysis of Industrial/Municipal Wastewater Version 2.0" (January 2016), PIBS 2724e02, as amended;
 - b. the publication "Standard Methods for the Examination of Water and Wastewater" (21st edition) as amended from time to time by more recently published editions;
 - c. for any parameters not mentioned in the documents referenced in Paragraphs 3.a and 3.b, the written approval of the District Manager shall be obtained prior to sampling.
4. The Owner shall undertake visual inspection of the sewage works at the time of sampling for the presence of water clarity, erosion, and flooding and shall record and report the findings in the annual performance report.
5. The measurement frequencies, parameters and sampling locations specified in the effluent monitoring table in Schedule B in respect of any parameter are minimum requirements which may, after **24 Months** of monitoring, be modified by the Director in writing from time to time.
6. The Owner shall retain for a minimum of **five (5) years** from the date of their creation, all records and information related to or resulting from the monitoring activities required by this Approval.

8. REPORTING

1. One (1) week prior to the start-up of the operation of the Works, the Owner shall notify the District Manager (in writing) of the pending start-up date.
2. The Owner shall report to the District Manager orally as soon as possible any non-compliance with the compliance limits, and in writing within seven (7) days of non-compliance.
3. The Owner shall, upon request, make all reports, manuals, plans, records, data, procedures and supporting documentation available to Ministry staff.
4. In addition to the obligations under Part X of the EPA and O. Reg. 675/98 (Classification and Exemption Of Spills and Reporting of Discharges), the Owner shall, within fifteen (15) days of the occurrence of any reportable spill as provided in Part X of the EPA and Ontario Regulation 675/98, submit a full written report of the occurrence to the District Manager describing the cause and discovery of the spill, clean-up and recovery measures

taken, preventative measures to be taken and a schedule of implementation.

5. The Owner shall prepare performance reports on a calendar year basis and submit to the District Manager by March 31 of the calendar year following the period being reported upon. In years where there are no water takings at the quarry site, the annual monitoring report can be abbreviated. The reports shall contain, but shall not be limited to, the following information pertaining to the reporting period:
 - a. a summary and interpretation of all monitoring data and a comparison to the effluent limits outlined in Condition 6, including an overview of the success and adequacy of the Works along with an evaluation of the impact of the quarry discharge to the receiver stream's water quality and potential impact on aquatic organisms;
 - b. a description of any operating problems encountered and corrective actions taken;
 - c. a summary of all maintenance carried out on any major structure, equipment, apparatus, mechanism or thing forming part of the Works, including an estimate of the quantity of any materials removed from the Works;
 - d. a summary of the calibration and maintenance carried out on all monitoring equipment;
 - e. a summary of any complaints received during the reporting period and any steps taken to address the complaints;
 - f. a summary of all spill or abnormal discharge events; and
 - g. any other information the District Manager requires from time to time.

Schedule A

1. Application for Environmental Compliance Approval, dated October 16, 2024 and received on November 8, 2024, submitted by WSP Canada Inc. on behalf of Thomas Cavanagh Construction Limited, along with all other supporting information, including engineering drawings prepared by WSP Canada Inc.
2. Water Management Report for Thomas Cavanagh Construction Limited, dated October 2023, for Pakenham Quarry in Mississippi Mills, prepared by WSP Canada Inc.

Schedule B

Effluent Limits Table

(measured at the Sampling Location O-1)

Effluent Parameter	Concentration Limits (milligrams per litre unless otherwise indicated)
Total Suspended Solids	25

Effluent Monitoring Table

Sampling Location (s)	<ol style="list-style-type: none"> 1. Location O-1 (proposed effluent monitoring location) 2. Location SA-2 (existing location downstream of O-1, and 3. Location SW-3 (new proposed upstream monitoring location)
Frequency	Monthly - during the periods of effluent discharge
Sample Type	Grab
Parameters	<ol style="list-style-type: none"> 1. Lab measured parameters - aluminium, hardness, barium, boron, cadmium, chromium, cobalt, copper, iron, lead, manganese, nickel, potassium, sodium, strontium, vanadium, zinc, alkalinity, ammonia, chloride, nitrate, nitrite, sulphate, TDS, TSS, turbidity, TKN, total phosphorus and phenols 2. Field measured parameters - pH, temperature, conductivity

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

1. Condition 1 is imposed to ensure that the Works are constructed and operated in the manner in which they were described and upon which approval was granted. This condition is also included to emphasize the precedence of conditions in the Approval and the practice that the Approval is based on the most current document, if several conflicting documents are submitted for review. Condition 1.4 is included to emphasize that the issuance of this Approval does not diminish any other statutory and regulatory obligations to which the Owner is subject in the construction, maintenance and operation of the Works. The Condition specifically highlights the need to obtain any necessary conservation authority approvals. The Condition also emphasizes the fact that this Approval doesn't limit the authority of the Ministry to require further information.
2. Condition 2 is included to ensure that the Ministry records are kept accurate and current with respect to the approved Works and to ensure that subsequent owners of the Works are made aware of the Approval and continue to operate the Works in compliance with it.
3. Condition 3 is included to ensure that the Ministry records are kept accurate and current with respect to approved Works and to ensure that subsequent owners of the Works are made aware of the Approval and continue to operate the Works in compliance with it.
4. Condition 4 is included as regular inspection and necessary removal of sediment and excessive decaying vegetation from the Works are required to mitigate the impact of sediment, debris and/or decaying vegetation on the treatment capacity of the Works. The Condition also ensures that adequate storage is maintained in the Works at all times as required by the design. Furthermore, this Condition is included to ensure that the Works are operated and maintained to function as designed.
5. Condition 5 and 6 is imposed to ensure that the effluent discharged from the Works meets the Ministry's effluent quality requirements, as specified, on a continuous basis, thus minimizing environmental impact on the receiver.
6. Condition 7 is included to require the Owner to demonstrate on a continual basis that the quality and quantity of the effluent from the approved Works is consistent with the design and effluent objectives specified in the Approval and that the approved Works does not cause any impairment to the receiving watercourse.
7. Condition 8 is included to provide a performance record for future references, to ensure that the Ministry is made aware of problems as they arise, and to provide a compliance record for all the terms and conditions outlined in this Approval, so that the Ministry can work with the Owner in resolving any problems in a timely manner.

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

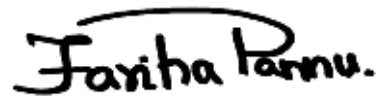
The Director appointed for the purposes of
Part II.1 of the *Environmental Protection Act*
Ministry of the Environment,
Conservation and Parks
135 St. Clair Avenue West, 1st Floor
Toronto, Ontario
M4V 1P5

*** 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 7th day of April, 2026



Fariha Pannu, P.Eng.

Director

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

MS/

c: District Manager, MECP Ottawa
Hesham Fouli, WSP Canada Inc.