

ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 8222-DRGRJ3
Issue Date: March 19, 2026

Imperial Oil Limited
505 Quarry Park Blvd SE
PO Box, No. 2480
Calgary, Alberta
T2C 5N1

Site Location: 422 Mill Street
Town of Bancroft, County of Hastings

You have applied under section 20.2 of Part II.1 of the Environmental Protection Act, R.S.O. 1990, c. E. 19 (Environmental Protection Act) for approval of:

- one (1) soil vapour extraction and treatment system equipped with one (1) granular activated carbon unit and one (1) biofilter, discharging to the air through a stack having a maximum volumetric flow rate of 0.35 cubic metre per second, an exit diameter of 0.152 metre, extending 4.9 metres above grade;

all in accordance with the Environmental Compliance Approval Application submitted by Imperial Oil Limited, dated August 5, 2025 and signed by Jamie Langlois; the supporting information including the Emission Summary and Dispersion Modelling Report prepared by WSP Canada Inc., dated June 6, 2025 and signed by Emily Lau; and the Acoustic Assessment Report prepared by WSP Canada Inc., dated June 17, 2025 and signed by Joe Tomaselli.

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

1. "Acoustic Assessment Report" means the report, prepared in accordance with Publication NPC-233, by WSP Canada Inc., and dated June 17, 2025 submitted in support of the application, that documents all sources of noise emissions and Noise Control Measures present at the Facility;
2. "Approval" means this Environmental Compliance Approval, including the application and supporting documentation listed above;
3. "Company" means Imperial Oil Limited that is responsible for the construction or operation of the Facility and includes any successors and assigns;

4. "Director" means a person appointed for the purpose of section 20.3 of the EPA by the Minister pursuant to section 5 of the EPA;
5. "District Manager" means the District Manager of the appropriate local district office of the Ministry where the Facility is geographically located;
6. "EPA" means the Environmental Protection Act, R.S.O. 1990, c.E.19, as amended;
7. "Equipment" means the soil vapour extraction and treatment systems described in the Company's application, this Approval and in the supporting documentation submitted with the application, to the extent approved by this Approval;
8. "Exhausted" means the capacity of the GAC to adsorb contaminant emissions is reached and the granular activated carbon filter unit is no longer able to effectively reduce emissions;
9. "Facility" means the entire operation located on the property where the Equipment is located;
10. "GAC" means granular activated carbon;
11. "Manual" means a document or a set of documents that provide written instructions to staff of the Company;
12. "Ministry" means the ministry of the government of Ontario responsible for the EPA and includes all officials, employees or other persons acting on its behalf;
13. "Monitoring Plan" means a written monitoring plan developed for the site as described in Condition 4;
14. "Monitoring Report" means a written report presenting the results of the monitoring conducted under the Monitoring Plan for the Site, as described in Condition 4;
15. "Noise Control Measures" means measures to reduce the noise emission from the Facility and/or Equipment including, but not limited to silencers, acoustic louvres, enclosures, absorptive treatment, plenums and barriers. It also means the noise control measures outlined in the Acoustic Assessment Report;
16. "Operations and Maintenance Manual" means the written operations and maintenance manual developed for the Facility as described in Condition 3;
17. "Process" means the soil vapour extraction and treatment process as described in the Company's application, this Approval and in the supporting documentation submitted with the application, to the extent approved by this Approval;
18. "Publication NPC-233" means the Ministry Publication NPC-233, "Information to be Submitted for

Approval of Stationary Sources of Sound", October, 1995, as amended;

19. "Publication NPC-300" means the Ministry Publication NPC-300, "Environmental Noise Guideline, Stationary and Transportation Sources – Approval and Planning, Publication NPC-300", August 2013, as amended;
20. Remedial Work Plan" means a plan, developed for the Process at the site and prepared as a single document as described in Condition 2;
21. "Soil, Groundwater and Sediment Standards" means the Ministry publication "Soil, Groundwater and Sediment Standards for Use under Part XV.1 of the Environmental Protection Act" dated April 15, 2011, as may be amended;
22. "Supporting Documents" means the Ministry publications that accompany the Soil, Groundwater and Sediment Standards including "Guide for Completing Phase II Environmental Site Assessment under Ontario Regulation 153/04" dated March 2021, as amended; and
23. "Target Compounds" means the volatile organic compounds and petroleum hydrocarbons as described in the Company's application, this Approval and in the supporting documentation submitted with the application, to the extent approved by this Approval, that the Equipment is designed to treat.

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

TERMS AND CONDITIONS

1. PERFORMANCE REQUIREMENTS

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

3. The Company shall, at all times, design and operate the Process so that no Target Compounds or their decomposition compounds, are permitted to migrate off-Site in groundwater or soil vapour, as a result of the Process, at concentrations greater than the applicable criteria provided in the Soil, Groundwater and Sediment Standards, appropriate worker health and safety criteria or Site specific criteria.
4. The Company shall, at all times, ensure that the noise emissions from the Facility comply with the limits set out in Ministry Publication NPC-300.

2. REMEDIAL WORK PLAN

1. The Company shall, before commencement of the operation of the Process at the site, prepare and submit to the District Manager for review, a Remedial Work Plan designed for the site that specifies, as a minimum:
 - a. the remedial objectives established for the site;
 - b. an overview of the work to be undertaken by the Company;
 - c. a description of the site;
 - d. land uses at the site and in the immediate surrounding vicinity;
 - e. locations of on-site and off-site receptors and potential migration pathways;
 - f. a site plan overview of the extent of contamination at the Site and any off-site migration;
 - g. a site plan showing the locations of the proposed Equipment and points of application of the Process;
 - h. overview of the site geology and hydrogeology, and expected chemical reactions resulting from the operation of the Process; and
 - i. alternative remedial measures to be undertaken in the event that the Process is not successful to meet the Remedial Work Plan objectives.

3. OPERATIONS AND MAINTENANCE MANUAL

1. The Company shall, before commencement of operation of the Process at the site, prepare and implement an Operations and Maintenance Manual for the Equipment and Process that specifies, as a minimum:
 - a. major components of the Equipment to be used in the Process;
 - b. frequency of inspections and scheduled maintenance for the Equipment;

- c. procedures to inspect, test and replace the GAC before it is exhausted;
- d. procedures to inspect, clean and replace the filter material in the Biofilter;
- e. procedures to measure and maintain the removal efficiency of the Target Compounds by the GAC and Biofilter;
- f. procedures to prevent spills relating to the operation of the Equipment and Process;
- g. procedures to prevent and/or minimize odorous and noise emissions;
- h. procedures to prevent and/or minimize the build-up of hazardous decomposition compounds with respect to appropriate worker health and safety criteria for the site;
- i. procedures to prevent any upset conditions and contingency measures to address any off-site migration;
- j. procedures to record and respond to environmental complaints; and
- k. steps to be carried out for the discontinuation of the Process.

4. MONITORING AND REPORTING

1. The Company shall, before commencement of operation of the Process at the site, design and implement a Monitoring Plan for the soil, groundwater, and soil vapour. The Monitoring Plan shall be prepared in accordance with the Supporting Documents and shall demonstrate that the Performance Requirements set out in Condition 1 are not exceeded and that the objectives of the Remedial Work Plan are achieved. The Monitoring Plan shall specify, at a minimum:
 - a. the Monitoring Plan objectives;
 - b. a list of analytical and/or indicator parameters;
 - c. a soil vapour monitoring program to assess the levels of Target Compounds at the site with respect to the Remedial Work Plan and appropriate worker health and safety criteria for the site;
 - d. identification of potential migration pathways on-site and off-site;
 - e. procedures for monitoring any potential off-site migration of Target Compounds or their decomposition compounds;
 - f. a site plan showing the approximate monitoring locations;

- g. frequency of the monitoring, prior to, during and after the Process; and
 - h. sampling methodology and QA/QC procedures, when applicable.
2. The Company shall submit, not later than twelve (12) months from the commencement of the Process at the site, and annually thereafter, to the District Manager a Monitoring Report on the results of the Monitoring Plan for the preceding period. Each Monitoring Report shall include, as a minimum, the following:
 - a. an overview of the operation of the system;
 - b. the frequency and scope of the monitoring;
 - c. a summary of the results of analytical and/or indicator parameters of the level of contamination at the site;
 - d. a trend analysis for the Target Compounds;
 - e. a copy of the Monitoring Plan; and
 - f. recommendations for changes to the Monitoring Plan, Remedial Work Plan or Operations and Maintenance Manual, and long-term site controls for the Process.
 3. The Company shall update and revise the Monitoring Plan as needed or as directed in writing by the District Manager.

5. NOTIFICATION OF COMPLAINTS

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

6. RECORD KEEPING REQUIREMENTS

1. The Company shall, retain for a minimum of two (2) years from the date of their creation, all reports, records, and information as described in this Approval, related to or resulting from the operation of the Process at the site including:
 - a. the Remedial Work Plan;

- b. the Monitoring Plan;
- c. records about the inspection, maintenance, and repair of the major components of the Equipment related to the Process;
- d. site plans showing the location of injection points, monitoring points and all other relevant site features;
- e. all monitoring results including, the Monitoring Report and any verification sampling; and
- f. records about complaints, including:
 - i. a description of the time and date of the complaint and of the incident to which the complaint relates;
 - ii. the nature of the complaint and the address of the complainant, if known;
 - iii. weather conditions at the time of the incident to which the complaint relates;
 - iv. a description of the measures taken to determine the possible causes of the complaint and the steps taken to investigate and deal with the cause of the incident to which the complaint relates and the steps taken and/or to be taken to prevent a similar occurrence in the future; and
 - v. a written response to the complainant, if known.

7. CHANGE OF OWNERSHIP

1. The Company shall notify the Director in writing, and forward a copy of the notification to the District Manger, within thirty (30) days of the occurrence of any of the following changes to the Facility operations:
 - a. the ownership of the Facility;
 - b. the operator of the Facility;
 - c. the address of the Company;
 - d. the partners, where the Company is or any time becomes a partnership and a copy of the most recent declaration filed under the *Business Names Act*, R.S.O. 1990, c. B.17, shall be included in the notification;
 - e. the name of the corporation where the Company is or at any time becomes a corporation, other than a municipal corporation, and a copy of the most current information filed under the

Corporations Information Act, R.S.O. 1990, c. C.39, shall be included in the notification.

2. In the event of any change in ownership of the Facility, the Company shall notify the successor of the existence of this Approval and provide the successor with a copy of this Approval, and the Company shall provide a copy of the notification to the District Manager and the Director.

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

1. Condition No. 1 is included to outline the minimum performance requirements considered necessary to prevent an adverse effect resulting from the operation of the Process.
2. Condition No. 2 is included to require the Company to gather accurate information and prepare a work plan prior to carrying out the Process at the Site and so that compliance with the EPA and this Approval can be verified.
3. Condition No. 3 is included to emphasize that the Equipment and Process must be operated according to a procedure that will result in compliance with the EPA, the regulations, and this Approval.
4. Condition No. 4 is included to require the Company to gather accurate information so that the environmental impact and subsequent compliance with the EPA, the regulations, and this Approval can be verified.
5. Condition No. 5 is included to require the Company to notify the Ministry so that the environmental impact and subsequent compliance with the EPA, the regulations, and this Approval can be verified.
6. Condition No. 6 is included to require the Company to retain records and provide information to the Ministry so that the environmental impact and subsequent compliance with the EPA, the regulations, and this Approval can be verified.
7. Condition No. 7 is included to require the Company to notify/report to the Ministry so that compliance with the EPA, the regulations and this Approval can be verified.

In accordance with Section 139 of the *Environmental Protection Act*, you may by written notice served upon me, the Ontario Land Tribunal and in accordance with Section 47 of the *Environmental Bill of Rights*, 1993, the Minister of the Environment, Conservation and Parks, within 15 days after receipt of this notice, require a hearing by the Tribunal. The Minister of the Environment, Conservation and Parks will place notice of your appeal on the Environmental Registry. Section 142 of the *Environmental Protection Act* provides that the notice requiring the hearing ("the Notice") shall state:

- a. The portions of the environmental compliance approval or each term or condition in the environmental compliance approval in respect of which the hearing is required, and;
- b. The grounds on which you intend to rely at the hearing in relation to each portion appealed.

The Notice should also include:

1. The name of the appellant;
2. The address of the appellant;
3. The environmental compliance approval number;
4. The date of the environmental compliance approval;
5. The name of the Director, and;
6. The municipality or municipalities within which the project is to be engaged in.

And the Notice should be signed and dated by the appellant.

This Notice must be served upon:

Registrar*
 Ontario Land Tribunal
 655 Bay Street, Suite 1500
 Toronto, Ontario
 M5G 1E5
 OLT.Registrar@ontario.ca

and

The Minister of the Environment,
 Conservation and Parks
 777 Bay Street, 5th Floor
 Toronto, Ontario
 M7A 2J3

and

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

* **Further information on the Ontario Land Tribunal’s requirements for an appeal can be obtained directly from the Tribunal at: Tel: (416) 212-6349 or 1 (866) 448-2248, or www.olt.gov.on.ca**

This instrument is subject to Section 38 of the *Environmental Bill of Rights*, 1993, that allows residents of Ontario to seek leave to appeal the decision on this instrument. Residents of Ontario may seek leave to appeal within 15 days from the date this decision is placed on the Environmental Registry. By accessing the Environmental Registry at <https://ero.ontario.ca/>, you can determine when the leave to appeal period ends.

The above noted activity is approved under s.20.3 of Part II.1 of the *Environmental Protection Act*.

DATED AT TORONTO this 19th day of March, 2026



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

BR/

- c: Area Manager, MECP Belleville
- c: District Manager, MECP Kingston - District
 Emily Lau, WSP Canada Inc.