

Director's Order

Director's Order Number
1-1559727751

Director's Order Issued To

MANSTEEL NEW LISKEARD INC.
15 WEST PEARCE ST, 1, RICHMOND HILL, ON, L4B 1E3

TROY WILSON

Site

Mansteel New Liskeard Landfill
1107 LAKESHORE ROAD SOUTH, TEMISKAMING SHORES, ON, P0J 1K0

Refer to the Definitions section in Part B of this Director's Order, for the meaning of all the capitalized terms that are used in this Director's Order.

PART A - WORK ORDERED

Pursuant to my authority under **EPA | 18 | 196(1)**, I order you, jointly and severally, unless otherwise indicated, to do the following:

Item No. 1 **Compliance Due Date:** Jul-15-2026

Within 5 days of the date of issuance of this Director's Order, the Orderees shall:

1. Hire a Qualified Person to oversee the work items required in this Director's Order.
2. Provide written notification of the name and contact information of the Qualified Person retained to the Director by email at greg.ault@ontario.ca and MECP.NorthBay@ontario.ca.

Item No. 2 **Compliance Due Date:** Jul-15-2026

The orderee Troy Wilson shall commence operation of the Sewage Works to ensure that the discharge of untreated Sewage to the natural environment does not occur.

Item No. 3 **Compliance Due Date:** Dec-31-2026

The orderee Troy Wilson shall provide a copy of an updated operations manual for the Sewage Works to the Director. The operations manual update shall be completed consistent with conditions 8 (1) and 8 (2) of the ECA.

Item No. 4 **Compliance Due Date:** Oct-31-2026

The Orderees shall complete, to the satisfaction of the Director, the seven (7) recommendations provided in section 9.0 of the Cap Assessment.

Item No. 5 Compliance Due Date: Mar-31-2027

By March 31, 2027, and every year thereafter, the orderer Troy Wilson shall provide an annual report to the Director on the operation of the Sewage Works, as per condition 10 (4) of the ECA.

Item No. 6 Compliance Due Date: Dec-31-2026

By December 31, 2026, and every year thereafter, the orderer Troy Wilson shall conduct all monitoring and recording required in the ECA.

PART B – DIRECTOR'S REPORT

This Director's Order is being issued for the reasons set out below.

Definitions

For the purposes of this Director's Order, the following capitalized terms shall have the meanings set out below:

“Cap Assessment” means the report titled *Mansteel New Liskeard Wood Waste Landfill Site Cap Assessment*, prepared by R.J. Burnside & Associates Limited, and dated August 31, 2022, attached hereto as Schedule B and forming part of this Director's Order.

“Company” means Mansteel New Liskeard Inc.

“Director” means the undersigned Director or any other person as may be designated as a Director for the purposes of this Director's Order.

“Director's Order” means this Director's Order Number 1-1559727751, as it may be amended.

“ECA” means Amended Environmental Compliance Approval No. 5377-9CXPXG issued to the Company on April 29, 2014, attached hereto as Schedule A and forming part of this Director's Order.

“EPA” means the Environmental Protection Act, R.S.O. 1990, c. E.19, as amended.

“Landfill” means the landfill site, approved by Certificate of Approval No. A570403, located on the Site.

“Ministry” and “MECP” mean the Ontario Ministry of the Environment, Conservation and Parks.

“Orderees” means, collectively, the Company – Mansteel New Liskeard Inc. – and Troy Wilson.

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

“Qualified Person” means a person who holds a licence, limited licence or temporary licence under the Professional Engineers Act; or a person who holds a certificate of registration under the Professional Geoscientists Act, 2000 and is a practising member, temporary member or limited member of the Association of Professional Geoscientists of Ontario.

“Sewage” has the same meaning as provided in the OWRA.

“Sewage Works” has the same meaning as provided in the OWRA.

“Site” means the property located at Lot 9 and 10, Concession 5 Bucke Township, Temiskaming Shores, Ontario, Canada having Property Identification Numbers PIN 52152-0004, PIN 52152-0008 (LT) and PIN 52152-0009 (LT).

Description of Person(s) Subject to the Director's Order

The Company is the current owner of the Site and the legal entity to whom the ECA has been issued. The Company remains bound by the requirements in a previous director's order no. 4375-ATZM9B to manage the Sewage at the Site. This Director's Order adds requirements that the Company must comply with and imposes requirements on on the orderee Troy Wilson.

Mr. Wilson is a person who had management and control of the Site. Mr. Wilson was a business associate of Arash Missaghi, the deceased director of the Company. Review of Ministry records shows a consistent history of interactions with Mr. Wilson as one with management and control of the Site and/or the Company. He has been a main contact for the Ministry on environmental issues at the Site since 2013, with increasing involvement since 2018. Review of legal documents shows that Mr. Wilson considered himself to be a principal of

the Company, making decisions on behalf of the Company and directing work at the Site over many years.

Following the passing of Mr. Missaghi in June 2024, Mr. Wilson continued to exercise management and control of the Site. An email dated July 4, 2024, from legal counsel for the Company to the Ministry stated: "I just heard from Troy and he can borrow some funds to keep the generator operational for 1 more week only. As of Friday, July 12th, the site will be at a serious risk of a spill."

Mr. Wilson has had direct involvement in corporations with an interest in the Site and/or Company since at least 2018. After Mr. Missaghi's passing, several corporations transferred directorship from Mr. Missaghi to Mr. Wilson, further indicating his assumption of control over business interests connected to the Company and the Site.

Based on this evidence, Mr. Wilson is a person who had management and control of the Site within the meaning of Section 18 of the EPA.

Description of the Site and/or System/Facility

The Site is located at municipal address 1107 Lakeshore Road South, City of Temiskaming Shores, ON, P0J 1K0. The Site comprises part of the north half of broken Lot 10, Concession 5 and part of the south half of Lot 9, Concession 5, Township of Bucke, Temiskaming Shores, District of Timiskaming, PIN 52152-0004, PIN 52152-0008 (LT) & PIN 52152-0009 (LT).

The Site is located in the City of Temiskaming Shores, approximately halfway between the former municipalities of New Liskeard and Haileybury. The Site consists of approximately 38 hectares located on the western shore of Lake Timiskaming. The Site is divided by Highway 11B with the former mill facility located on the north side of the highway and a 5.4 hectare wood waste landfill, the Landfill, located on the south side of the highway.

The Site is bordered by Lake Timiskaming to the north. Dickson Creek, farm lands, and residences are located to the west of the Site. The Ontario Northland Railway and forested lands are located to the south. A commercial property, residences along Lake Timiskaming, and forested lands are located to the east.

The residences in the vicinity of the Site are not provided with municipal services and obtain water from groundwater wells or from Lake Timiskaming. The Landfill, Sewage from the Landfill, and the Site are potential sources of contamination to these private water supplies. Lake Timiskaming is also the municipal drinking water source for the former Town of Haileybury. Ongoing discharges from the Site and a possible catastrophic release of the contents of the Sewage Works would impact Lake Timiskaming and could potentially impact this municipal drinking water supply.

The Site has been used as an industrial facility for roughly a century with it originally being a sawmill operated by E. B. Eddy Company. In 1968 the facility was converted to a medium density fiberboard mill operated by Rexwood Products Limited (Rexwood). In 1999, Uniboard New Liskeard Inc. purchased the Site from Rexwood and operated the mill until the mill was

permanently shut down in June 2005. The Company purchased the Site in 2012 and is responsible for the management and monitoring of the Landfill and the Sewage Works at the Site.

Initially approved by the Ministry in November 2000, a leachate collection system was constructed at the Site. In September 2008, Certificate of Approval No. 4957-7DCJBV was issued to Uniboard Canada Inc., for construction of leachate pumping stations and a leachate treatment system at the Site. This approval was re-issued as Amended Certificate of Approval No. 8413-7YXKYN in February 2010, amending the financial assurance conditions. Following the purchase of the Site by Mansteel New Liskeard Inc., the approval was issued to the Company in January 2013, as Environmental Compliance Approval No. 2478-8YPHYE. This 2013 version converted the approval to the Environmental Compliance Approval regime under the EPA, changed the owner to the Company, added a leachate evaporation and irrigation system, and updated monitoring and operating conditions. That approval was amended to allow minor modifications to previously approved dimensions and storage capacities of the leachate evaporation basin and one of the aeration ponds, and issued to the company as the ECA on April 29, 2014.

The Sewage Works was never constructed as approved by the Ministry.

Provincial officer's order no. 0584-9C2RTR was issued to the Company in October 2013, requiring, among other things, submission of a written action plan prepared by a consultant by April 30, 2014, and construction of the leachate treatment system by May 30, 2014. The Company did not comply and was prosecuted. A court order was issued to the Company on June 23, 2016, requiring the construction of the leachate treatment system by November 15, 2016. The Company did not comply with the court order. Director's order no. 4375-ATZM9B was issued to the Company on March 22, 2018, requiring, among other things, construction and repairs of the leachate collection system by summer and fall of 2018. The Company did not comply with the director's order and was prosecuted. On February 11, 2022, a court order was issued to the Company, requiring, among other things, submission of an application to amend the ECA by September 1, 2022, and construction of the amended works by September 1, 2024. The Sewage Works has not been constructed as approved by the Ministry, with the ECA ceasing to apply to those parts of the proposed works that were not constructed within five (5) years of the date of issuance of the ECA.

The Company submitted an application to amend the ECA on September 1, 2022. This amendment has not yet been approved by the Ministry due to the Company's failure to complete the required pre-submission consultation process. The Ministry is working to finalize the approval of this ECA amendment. Once the amended ECA has been issued, the Ministry will expect the Company to construct, operate, and maintain the approved Sewage Works, as required by the February 11, 2022, court order and will expect the orderer Troy Wilson to do the same as required by this Director's Order.

Reasons for the Director's Order

After being informed by Troy Wilson (through his counsel) on behalf of the Company in July 2024 that the Orderes were stepping away from the Site, the Ministry initiated an emergency

procurement and entered into a contract with an environmental consultant to manage leachate at the Site. A subsequent competitive procurement was undertaken by the Ministry, leading to the signing of an agreement with a different contractor on October 13, 2025. This contract is still active. As per Director's Order No. 1-207234986 issued to the Company on July 11, 2024, financial assurance is being used to fund the Ministry's work at the Site.

The Ministry sent a letter to Mr. Wilson on March 25, 2025 requesting a response by April 4, 2025, outlining the steps to be taken by Mr. Wilson to manage the Site, including a timeline for implementation, to bring the site into compliance with Director's Order No. 4375-ATZM9B and the court order issued on February 11, 2022. The response received from Mr. Troy's legal counsel on May 20, 2025, indicated that Mr. Wilson was not willing to comply with the Ministry's requirements voluntarily. This Director's Order is the Ministry's response to the May 20, 2025, letter and complete lack of action by the Orderees.

- i. The requirements in Part A of this Director's Order must be undertaken in order to protect the natural environment and critical infrastructure and to prevent, decrease or eliminate the potential for adverse effects

Authority to Issue the Director's Order

I am issuing this Director's Order under Section 18 and 196(1) of the EPA.

I have reasonable and probable grounds to believe the requirements specified in this Director's Order are necessary or advisable so as:

- (a) to prevent, or reduce the risk of any discharge of contaminants into the natural environment from the Site, or
- (b) to prevent, decrease or eliminate an adverse effect, that may result from:
 - (i) the discharge of a contaminant from the Site, or
 - (ii) the presence of a discharge of a contaminant in, on or under the Site.

Attachments

The attachments listed below, if any, form part of this Director's Order:

- 1) Schedule A – Leachate Treatment Environmental Compliance Approval No. 5377-9CXPXG
- 2) Schedule B – Mansteel New Liskeard Wood Waste Landfill Site Cap Assessment

ISSUING DIRECTOR

Name: Greg Ault

Job Title: District Manager

Badge Number: 2077

Address: 191 BOOTH ROAD, UNIT 16 & 17, NORTH BAY, ON, P1A 4K3

Director Email: greg.ault@ontario.ca

Office Email: MECP.Timmins@ontario.ca

Date: July 10, 20256

Signature:

APPEAL TO THE ONTARIO LAND TRIBUNAL INFORMATION

REQUEST FOR HEARING

You may require a hearing before the Ontario Land Tribunal if, within 15 days of service of this Director's Order, you serve written notice of your appeal on the Ontario Land Tribunal and the Director at the addresses indicated under the Contact Information heading below. Your notice of appeal must state the portions of this Director's Order for which a hearing is required and the grounds on which you intend to rely at the hearing. If notice of the proposal to issue this Director's Order was given to the public on the Environmental Registry, the Minister of the Environment, Conservation and Parks will place notice of your appeal on the Environmental Registry.

CONTACT INFORMATION

Registrar
Ontario Land Tribunal
655 BAY STREET, SUITE 1500
TORONTO, ON M5G 1E5
Email: OLT.Registrar@ontario.ca

and Director
Ministry of the Environment,
Conservation and Parks
Timmins District Office
5520 HWY 101E, SOUTH PORCUPINE
TIMMINS, ON, P0N 1H0
Office Email: MECP.Timmins@ontario.ca
Fax: (705) 235-1520

Further information regarding the requirements and procedures of the Ontario Land Tribunal can be obtained directly from the Tribunal at:

Tel: (416) 212-6349, Toll Free: 1(866) 448-2248 or www.olt.gov.on.ca

SERVICE INFORMATION

Service of the documentation referred to above can be made personally, by mail, by fax (in the case of the Director only), by commercial courier or by email in accordance with the legislation under which this Director's Order is made and any corresponding service regulation.

ADDITIONAL INFORMATION

Unless stayed by the Ontario Land Tribunal, this Director's Order is effective from the date of service.

Failure to comply with a requirement of this Director's Order constitutes an offence. Unless otherwise indicated, the obligation to comply with a requirement of this Director's Order continues on each day after the specified compliance date until the obligation has been satisfied.

The requirements of this Director's Order are minimum requirements only and do not mean that you are not required to comply with any other applicable legal requirements, including any:

- statute, regulation, or by-law;
- federal, provincial, or municipal law; or
- applicable requirements that are not addressed in this Director's Order.

The requirements of this Director's Order are severable. If any requirement of this Director's Order, or the application of any requirement to any circumstance, is to be held invalid or unenforceable, such finding does not invalidate or render unenforceable the requirement in other circumstances. It also does not invalidate or render unenforceable the other requirements of this Director's Order.

Further orders may be issued in accordance with the legislation as may be appropriate.

This Director's Order is binding upon any successors or assignees of the persons to whom this Director's Order is issued.

The procedures to request a hearing and an appeal of this Director's Order and other information provided above are intended as a guide. The legislation should be consulted for additional details and accurate reference. Further information can be obtained from e-Laws at www.ontario.ca/laws.

Schedule A

Leachate Treatment Environmental Compliance Approval No. 5377-9CXPXG

Schedule B

Mansteel New Liskeard Wood Waste Landfill Site Cap Assessment Leachate Treatment