

AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 7509-DKPNY6
Issue Date: May 6, 2026

Cargill Limited
165 Dunlop Dr
Guelph, Ontario
N1L 1P4

Site Location: 165 Dunlop Drive
165 Dunlop Dr
Guelph City, County of Wellington

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) protein recovery system, including blood dryer (source 3131-215, equipped with Low NOx natural gas fired burner, having a maximum heat input of 6.3 gigajoules per hour) and a product recovery cyclone, operating at the maximum raw blood flow rate of 4,536 kilograms per hour, discharging to the air through a regenerative thermal oxidizer (RTO);
 - one (1) RTO (source 6115-150) to control emissions from a protein recovery system, equipped with a natural gas fired burner, having a maximum heat input of 1.06 gigajoules per hour, discharging to the air at a nominal volumetric flow rate of 2.38 actual cubic metres per second at a nominal temperature of 118 degrees Celsius through a stack (source 6115-150), having an exit diameter of 0.56 metre, extending 10.00 metres above the roof and 25.90 metres above grade;
- one (1) natural gas fired hot water heater (source 3634-115, Kemco 150), having a maximum heat input of 11.6 gigajoules per hour, discharging into the air through a stack (source 6328-130), having an exit diameter of 0.41 metre, extending 4.65 metres above the roof and 16.65 metres above grade;
- one (1) natural gas fired hot back-up water heater (source 3630-250, Kemco 190), operating up to 500 hours per year, having a maximum heat input of 26.4 gigajoules per hour, discharging into the air through a stack (source 6326-100), having an exit diameter of 0.76 metre, extending 9.85 metres above the roof and 21.85 metres above grade;

- one (1) natural gas fired hot water heater (source 3560-110, Kemco TE-100), having a maximum heat input of 26.4 gigajoules per hour, discharging into the air through a stack (source 3560-110), having an exit diameter of 1.53 metres, extending 3.05 metres above the roof and 12.19 metres above grade;
- one (1) natural gas fired boiler (source 3630-113, Boiler 4), having a maximum heat input of 17.7 gigajoules per hour, discharging into the air through a stack (source 6333-100), having an exit diameter of 0.65 metre, extending 5.38 metres above the roof and 13.38 metres above grade;
- one (1) natural gas fired boiler (source 3520-170, Boiler 5), having a maximum heat input of 17.7 gigajoules per hour, discharging into the air through a stack (3520-170), having an exit diameter of 0.65 metre, extending 5.69 metres above the roof and 13.69 metres above grade;
- one (1) natural gas fired boiler (source 3634-210, Boiler 3), having a maximum heat input of 7.1 gigajoules per hour, discharging into the air through a stack (source 3634-210), having an exit diameter of 0.46 metre, extending 5.61 metres above the roof and 13.61 metres above grade;
- one (1) natural gas fired water heater (source 3634-110 Kemco 100), having a maximum heat input of 5.8 gigajoules per hour, discharging into the air through a stack (source 6328-140), having an exit diameter of 0.25 metre, extending 5.15 metres above the roof and 17.15 metres above grade;
- two (2) exhaust systems (source 6130-140 and 6130-145), serving carcass wash operations, each discharging into the air at a nominal volumetric flow rate of 3.30 actual cubic metres per second through a stack, each having an exit diameter of 0.48 metre, each extending 2.63 metres above the roof and 12.13 metres above grade;
- one (1) exhaust system (Hide Puller Exhaust, source 6110-215), discharging into the air at a nominal volumetric flow rate of 4.72 actual cubic metres per second through a stack, having an exit diameter of 0.38 metre, extending 6.1 metres above the roof and 19.58 metres above grade;
- one (1) exhaust system (Hide Puller Exhaust, source 6110-220), discharging into the air at a nominal volumetric flow rate of 4.72 actual cubic metres per second through a stack, having an exit diameter of 0.38 metre, extending 6.1 metres above the roof and 19.63 metres above grade;
- three (3) roof-top cooling towers (sources CT-1, CT-2 and CT-3), each having a nominal water circulation flow rate of 75.7 litres per second;
- two (2) roof-top cooling towers (sources CT-4 and CT-5), each having a nominal water circulation flow rate of 86.4 litres per second;
- general exhaust systems serving the facility operations, as described in the ESDM Report;

all in accordance with the Application for Approval (Air & Noise) submitted by Cargill Limited dated April 16, 2025, and signed by Matt Gibney, General Manager AVP; the Emission Summary and Dispersion Modelling Report (ESDM Report) prepared by Mike Jammer (Ramboll Canada Inc.) and dated April 16, 2025; the emails from Mike Jammer (Ramboll Canada Inc.) dated August 1, 2025 and November 3, 2025; the Primary Noise Screening Form dated December 10, 2024 by Amir Saghaeian of Ramboll Canada Inc; and all supporting information associated with the application.

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

1. "Approval" means this Environmental Compliance Approval, including the application and supporting documentation listed above;
2. "Company" means Cargill Limited operating as Cargill Limited that is responsible for the construction or operation of the Facility and includes any successors and assigns in accordance with section 19 of the EPA;
3. "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;
4. "District Manager" means the District Manager of the appropriate local district office of the Ministry, where the Facility is geographically located;
5. "EPA" means the Environmental Protection Act, R.S.O. 1990, c.E.19;
6. "Equipment" means the equipment described in the Company's application, this Approval and in the supporting documentation submitted with the application, to the extent approved by this Approval;
7. "Facility" means the entire operation located on the property where the Equipment is located;
8. "Manual" means a document or a set of documents that provide written instructions to staff of the Company;
9. "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;
10. "Odour Action Plan" means the document entitled "Odour Potential - Mitigation Strategy" dated July 31, 2025 and signed by Kaitlyn Boyne, Cargill-Guelph Dunlop Plant, as amended;
11. "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.

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. OPERATION AND MAINTENANCE

1. The Company shall ensure that the Equipment is properly operated and maintained at all times. The Company shall:
 - a. prepare, not later than three (3) months after the date of this Approval, and update as necessary, a Manual outlining the operating procedures and a maintenance program for the Equipment, including:
 - i. routine operating and maintenance procedures in accordance with good engineering

- practices and as recommended by the Equipment suppliers;
 - ii. emergency procedures, including spill clean-up procedures;
 - iii. procedures for any record keeping activities relating to operation and maintenance of the Equipment;
 - iv. all appropriate measures to minimize noise and odorous emissions from all potential sources; and
 - v. effective fugitive odour control measures to minimize fugitive odour emissions from the Facility;
- b. implement the recommendations of the Manual; and
 - c. retain, for a minimum of two (2) years from the date of their creation, all records on the maintenance, repair and inspection of the Equipment, and make these records available for review by staff of the Ministry upon request.
2. The Company shall implement the Odour Action Plan.
- a. The Company shall update the Odour Action Plan as necessary or at the direction of the District Manager.

2. RECORD RETENTION

1. The Company shall retain, for a minimum of two (2) years from the date of their creation, all records and information related to or resulting from the recording activities required by this Approval, and make these records available for review by staff of the Ministry upon request. The Company shall retain:
- a. all records on the maintenance, repair and inspection of the Equipment;
 - b. records of back-up water heater (source 3630-250, Kemco 190) operation time; and
 - c. all records of any environmental complaints, including:
 - i. a description, time and date of each incident to which the complaint relates;
 - ii. wind direction at the time of the incident to which the complaint relates; and
 - iii. a description of the measures taken to address the cause of the incident to which the complaint relates and to prevent a similar occurrence in the future.

3. 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; and
 - b. the time and date of the incident to which the complaint relates.

4. NOISE

1. 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.

5. RTO

1. The Company shall ensure that the RTO is operated to comply, at all times, with the following requirements:
 - a. The gaseous waste stream from a dryer is not introduced into the RTO, until the temperature in the combustion chamber has reached a minimum of 844 degrees Celsius, as measured by a continuous monitoring device at the outlet of the combustion chamber;
 - b. A minimum operating temperature of 844 degrees Celsius is maintained in the RTO combustion chamber, at a point representing minimum 0.5 second residence time, at all times when the oxidizer is in operation and waste stream gases are directed to the RTO for destruction.
2. The Company shall continuously monitor and record the temperature in the combustion chamber of the RTO, when the oxidizer is in operation. The continuous temperature monitoring and recording system shall comply with the requirements listed in Schedule A.

6. CHANGE OF OWNERSHIP

1. The Company 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 of the following changes to 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; or
 - 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.

SCHEDULE A: Temperature Monitoring

LOCATION:

The sample point for the continuous temperature monitoring and recording system shall be installed at a location where the measurements are representative of the minimum temperature of the undiluted gases leaving the RTO stack.

PERFORMANCE:

The Continuous Temperature Monitoring system shall meet the following minimum performance specifications for the following parameters.

| PARAMETERS | SPECIFICATION |
|------------------------------|---|
| Type | shielded "K" type thermocouple, or equivalent |
| Accuracy | ± 1.5 percent of the minimum gas temperature |
| Response Time (95%) | 60 sec. (max) |
| Operating Range (Full Scale) | 1.5 times approval limit |
| Standard Tolerance | ± 2.2 °C or ± 0.75% |
| Resolution | 0.1 °C |
| Calibration | Per manufacturer's recommendations |

RECORDER:

The recorder must be capable of registering continuously the measurement of the monitoring system without a significant loss of accuracy and with a time resolution of 5 minutes or better.

RELIABILITY:

The monitor shall be operated and maintained so that accurate data is obtained during a minimum of 90 percent of the time for each calendar quarter during the first full year of operation, and 95 percent, thereafter.

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

1. Condition No. 1 is included to emphasize that the Equipment must be maintained and operated according to a procedure that will result in compliance with the EPA, the Regulations and this Approval.
2. Condition No. 2 is included to require the Company to keep records and to provide information to staff of the Ministry so that compliance with the EPA, the Regulations and this Approval can be verified.
3. Condition No. 3 is included to require the Company to notify staff of the Ministry so as to assist the Ministry with the review of the site's compliance.
4. Conditions No. 4 and No. 5 are included to provide the minimum performance requirements considered necessary to prevent an adverse effect resulting from the operation of the Facility.
5. Condition No. 6 is included to require the Company to notify/report to the Ministry so that compliance with the EPA, the regulations and this Approval can be verified.

**Upon issuance of the environmental compliance approval, I hereby revoke Approval No(s).
5246-B8MRNS issued on February 8, 2019.**

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.

Pursuant to subsection 139(3) of the *Environmental Protection Act*, a hearing may not be required with respect to any terms and conditions in this environmental compliance approval, if the terms and conditions are substantially the same as those contained in an approval that is amended or revoked by this environmental compliance approval.

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 6th day of May, 2026



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

JK/

c: District Manager, MECP Guelph
Elizabeth Maggs, Ramboll Canada Inc.