

ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 9786-DP8HDR

Issue Date: May 12, 2026

I.A. Fletcher Holdings Inc.
7012 Rainham Road, Dunnville
Haldimand, Ontario
N1A 2W8

Site Location: 310 Riverside Dr, Nanticoke
Haldimand County,
N0A 1L0

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) Composting Facility, used to:
 - receive non-hazardous solid organic waste sourced within Ontario with a maximum:
 - daily receiving rate of 800 tonnes of waste;
 - annual waste receiving rate of 65,000 tonnes per year; and
 - storage capacity of 12,000 tonnes of waste at one time
 - process maximum annual waste quantity of 80,000 tonnes per year that include maximum of:
 - 50,000 tonnes per year of source separated organics;
 - 15,000 tonnes per year of leaf and yard waste; and
 - 15,000 tonnes per year of recycled materials (or Overs from the process)

and their conversion employing the GORE covered aerated static pile composting process, comprising the following process/operations and equipment:

- one (1) fully enclosed Receiving Building with two receiving bays equipped fast-acting roll-up doors, used for the:
 - receipt, and tipping of the incoming Organic Waste and amendment material;
 - shredding; and
 - mixing with amendment materials using a front end loader, which is either ground wood waste or overs resulting from final compost screening.
- eight (8) Phase 1 outdoor, GORE covered aerated static pile that are being used for aerobic composting for 21-28 days;
- eight (8) Phase 2 outdoor, GORE covered aerated static pile that are being used for aerobic composting for an additional period of 14-21 days;
- two (2) screeners that are used for screening, each operating at a maximum production rate of 800 tonnes per day and operating for a total of 12 hours per day, split between both screeners, discharging into the air at a release height of 2.0 metres above grade;
- two (2) wood grinders that are used for wood grinding, each operating at a maximum production rate of 28 tonnes per hour discharging into the air at a release height of 3.0 metres above grade;
- one (1) ventilation system that maintains negative pressure in the enclosed Receiving Building at all times excluding any time periods of Malfunction and directs the exhaust air from the enclosed Receiving Building to the Biofilter;
- one (1) enclosed up-flow, organic wood media Biofilter, with three (3) cells, equipped with in built sprinkler system for media irrigation, with a minimum Empty Bed Residence Time (EBRT) of 40 seconds, consisting of wood chips media to a depth of 1.5 metres, with an overall dimensions of 30 metres length, 10 metres width and 2.0 metres height, used for the removal of odour from the incoming air from the enclosed Receiving Building, discharging into the air at a maximum volumetric flow rate 10.8 cubic metres per second, at a release height of 1.5 metres above grade;

all in accordance with the Application for Approval (Air) submitted by the Company, dated December 19, 2024 and signed by Ian Fletcher, including the Emission Summary and Dispersion Modelling Report, submitted by GHD, February 26, 2026 (submitted on March 27, 2026) and signed by Matthew Griffin; and email updates provided by Amin Costas of GHD on March 03, 27 and 30, and April 13, 2026; and email updates provided by Tanya Bogoslawski of GHD on April 21 and May 06, 2026 as well as the Acoustic Assessment Report prepared by GHD Limited, dated December 20, 2024 and signed by Joyce Yotchoua / Michael Masschaele;

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 submitted in support of the application, that documents all sources of noise emissions at the Facility. "Acoustic Assessment Report" also means the Acoustic Assessment Report prepared by GHD Limited, dated December 20, 2024 and signed by Joyce Yotchoua / Michael Masschaele.
2. "Acoustic Audit" means an investigative procedure consisting of measurements and/or acoustic modelling of all sources of noise emissions due to the operation of the Facility, assessed to determine compliance with the Performance Limits for the Facility regarding noise emissions, completed in accordance with the procedures set in Publication NPC-103 and reported in accordance with Publication NPC-233;
3. "Acoustic Audit Report" means a report presenting the results of an Acoustic Audit, prepared in accordance with Publication NPC-233;
4. "Acoustical Consultant" means a person currently active in the field of environmental acoustics and noise/vibration control, who is familiar with Ministry noise guidelines and procedures and has a combination of formal university education, training and experience necessary to assess noise emissions from a Facility;
5. "AERMOD" means the dispersion model developed by the American Meteorological Society/U.S. Environmental Protection Agency Regulatory Model Improvement Committee (AERMIC) including the PRIME (Plume Rise Model Enhancement) algorithm, used to calculate one-hour average concentrations of a contaminant at the Point of Impingement and at the most impacted Sensitive Receptor;
6. "Amendment Materials" means brush, Wood and Wood products, that do not contain painted wood or composite wood products, including laminated wood;
7. "Approval" means this Environmental Compliance Approval and any Schedules to it, including the application and supporting documentation listed above;
8. "Approval (Waste)" means Environmental Compliance Approval No. NUMBER 7658-DS2KMH issued on March 30, 2026, in respect of activities mentioned in subsection 27(1) of the EPA at the Facility, as amended;
9. "Biofilter" means the one (1) enclosed biofilter described in this Approval and in the supporting documentation referred to herein, to the extent approved by this Approval;
10. "Company" means I.A. Fletcher Holdings Inc. that is responsible for the construction or operation of the Facility and includes any successors and assigns;
11. "Compliance Report" means a report prepared for the purpose of meeting the requirements of terms and condition No. 7 of this Approval;

12. "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;
13. "District Manager" means the District Manager of the appropriate local district office of the Ministry, where the Facility is geographically located;
14. "EPA" means the Environmental Protection Act, R.S.O. 1990, c.E.19, as amended;
15. "Equipment" means the equipment or processes described in the Company's application, this Approval and in the supporting documentation submitted with the application, to the extent approved by this Approval;
16. "ESDM Report" means the most current Emission Summary and Dispersion Modelling Report that describes the Facility. The ESDM Report is based on the Original ESDM Report and is updated after the issuance of this Approval in accordance with section 26 of O. Reg. 419/05 and the Procedure Document;
17. "Facility" means the facility that is being used for the receipt of Organic Waste and Amendment Materials and the entire operation and associated equipment that are being used to convert it to finished compost;
18. "Independent Acoustical Consultant" means an Acoustical Consultant who is not representing the Company and was not involved in preparing the Acoustic Assessment Report or the design/implementation of Noise Control Measures for the Facility and/or Equipment. The Independent Acoustical Consultant shall not be retained by the Acoustical Consultant involved in the noise impact assessment or the design/implementation of Noise Control Measures for the Facility and/or Equipment;
19. "Malfunction" means any sudden, unplanned, infrequent and not reasonably preventable failure of the equipment associated with maintaining or monitoring negative pressure and negative air balance in the enclosed Receiving Building, excluding failures that may be caused in part by poor maintenance or negligent operation;
20. "Manager" means the Manager, Technology Standards Section, Technical Assessment and Standards Development Branch, or any other person who represents and carries out the duties of the Manager, as those duties relate to the conditions of this Approval;
21. "Manual" means a document or a set of documents that provides written instructions to staff of the Company;
22. "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;

23. "Monitoring Protocol" means monitoring and recording system used to measure and record the operational parameters and concentrations for the purpose of meeting the requirements of terms and condition No. 2 of this Approval;
24. "O. Reg. 419/05" means the Ontario Regulation 419/05, Air Pollution – Local Air Quality; as amended;
25. "Odour Management Plan" means a document or a set of documents that provide written instructions to staff of the Company, for the purpose of meeting the requirements of terms and condition No. 3(1)(b) of this Approval;
26. "Organic Waste" means solid non-hazardous waste derived from plants or animals, including wastes consisting of other compounds of carbon, all readily biodegradable, and as further described in this Approval and destined for composting at the Facility;
27. "Original ESDM Report" means the Emission Summary and Dispersion Modelling Report prepared in accordance with section 26 of O. Reg. 419/05 and the Procedure Document signed by Matthew Griffin, GHD dated February 26, 2026 (submitted on March 27, 2026) and submitted in support of the application, and includes any changes to the report made up to the date of issuance of this Approval;
28. "Performance Limits" means the performance limits specified in the section of this Approval titled Performance Limits;
29. "Point of Impingement" has the same meaning as in section 2 of O. Reg. 419/05;
30. "Pre-Test Plan" means a plan for the Source Testing including the information required in Section 5 of the Source Testing Code;
31. "Procedure Document" means Ministry guidance document titled "Procedure for Preparing an Emission Summary and Dispersion Modelling Report" dated February 2017, as amended;
32. "Professional Engineer" means Professional Engineer as defined within the Professional Engineers Act, R.S.O. 1990, as amended;
33. "Publication NPC-103" means the Ministry Publication NPC-103 of the Model Municipal Noise Control By-Law, Final Report, August 1978, published by the Ministry as amended;
34. "Publication NPC-233" means the Ministry Publication NPC-233, "Information to be Submitted for Approval of Stationary Sources of Sound", October, 1995, as amended;
35. "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;

36. "Sensitive Receptor" means any location where routine or normal activities occurring at reasonably expected times would experience adverse effect(s) from odour discharges from the Facility, including one or a combination of:
- a. private residences or public facilities where people sleep (e.g.: single and multi-unit dwellings, nursing homes, hospitals, trailer parks, camping grounds, etc.),
 - b. institutional facilities (e.g.: schools, churches, community centres, day care centres, recreational centres, etc.),
 - c. outdoor public recreational areas (e.g.: trailer parks, play grounds, picnic areas, etc.), and
 - d. other outdoor public areas where there are continuous human activities (e.g.: commercial plazas and office buildings);
37. "Source Testing Code" means the Ontario Source Testing Code, dated June 2010, prepared by the Ministry, as amended; and
38. "Source Testing" means site-specific sampling and testing to measure the rates of emissions of odour, hydrogen sulphide, total mercaptans and ammonia from the Biofilter exhaust under operating conditions that will derive an emission rate that, for the relevant averaging period of the contaminant, is at least as high as the maximum emission rate that the source of contaminant is reasonably capable of within the approved operating range of the Biofilter which satisfies paragraph 1 of subsection 11(1) of O. Reg. 419/05 or as directed or agreed by the Manager.

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

TERMS AND CONDITIONS

PERFORMANCE LIMITS

1. NOISE PERFORMANCE

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.

2. MONITORING

1. The Company shall prepare and submit to the District Manager, not later than three (3) months prior to receiving Organic Waste at the Facility or as directed or agreed by the District Manager, a Monitoring Protocol to monitor and record the critical system parameters for the Biofilter and Facility including enclosed Receiving Building, and review and update as necessary or as a minimum

annually. The Monitoring Protocol should include following but not limited to:

- a. details of sensors, meters and physical probes that will be used including calibration;
 - b. monitoring and recording (data logging) at frequencies either as recommended by the Equipment suppliers or as determined by operational needs, except for frequencies identified in this Approval.
 - c. target limits and/or optimum operating range and alarm triggers; and
 - d. determination of the remedial action(s) to address the cause(s) of the alarms, and implementation of the remedial action(s) to eliminate the cause(s) of the alarm as soon as practicably possible.
2. The Company shall monitor and record the following physical parameters of the Biofilter and the enclosed Receiving Building.
- a. Biofilter:
 - i. total process air flow through the Biofilter;
 - ii. differential pressure across media bed in the Biofilter;
 - iii. inlet air temperature;
 - iv. inlet process air relative humidity;
 - v. media temperature in each cell;
 - vi. water flow and total volume of water used through sprinkler system for media irrigation; and
 - vii. media in each cell, minimum 3 depths in the media (moisture content, heterotrophic plate count/total microbial count (TMC), pH, ammonia, ammonium ions, nitrates, sulphur and sulphate (once every three (3) months as a minimum);
 - viii. ammonia, manually at the inlet and outlet of the Biofilter, once per day, from Monday to Friday (excluding statutory holidays).
 - b. Enclosed Receiving Building:
 - i. negative pressure (rolling arithmetic average over 1-hour period) every five minutes utilizing negative pressure data every second;
 - ii. negative air balance (rolling arithmetic average over 1-hour period);

- iii. hydrogen sulphide; and
 - iv. ammonia.
3. The Company shall monitor and record the physical parameters of the Biofilter identified in condition No. 2(2) of this Approval through continuous logging using SCADA system, at least every 5 minutes except for Biofilter media and ammonia; excluding any time periods of power surges, power outages, instrument malfunction and other abnormal operating conditions.

3. OPERATION AND MAINTENANCE

1. The Company shall ensure that the Facility and the Equipment are properly operated and maintained at all times. The Company shall:
- a. prepare and submit to the District Manager, not later than three (3) months prior to receiving Organic Waste at the Facility a Manual, and review and update as necessary or as a minimum annually, outlining the operating procedures for the Facility that relate to odour and noise, as well as the operating procedures and a maintenance program for the Equipment in accordance with good engineering practice, including:
 - i. routine and emergency operating and maintenance procedures recommended by the Equipment suppliers, including operating procedures for the Facility that relate to odour and noise during Equipment malfunction, power outages, by-passes and other emergency or abnormal operating conditions and procedures for notifying the Ministry of such events;
 - ii. frequency of monitoring of the parameters for the Biofilter and enclosed Receiving Building as required in Condition 2 above;
 - iii. frequency of inspection and replacement of the Biofilter media;
 - iv. procedures for any record keeping activities relating to the operation and maintenance of the Equipment and the odour and noise related activities at the Facility; and
 - v. all appropriate measures to minimize the odour and noise emissions from all potential sources, including but not limited to a contingency plan when the Facility is shut down;
 - b. prepare and submit to the District Manager, not later than three (3) months prior to receiving Organic Waste at the Facility an Odour Management Plan, and review and update as necessary or as a minimum annually, outlining:
 - i. elements of operation of the Facility that have a potential to release odour including fugitive odour emission sources; and

- ii. the physical and procedural controls such as policies and standard operating procedures, monitoring, measurement, corrective actions, communication and management reviews required in order to prevent or mitigate any impacts on the Sensitive Receptors.
 - c. implement the procedures/recommendations of the accepted and updated operation and maintenance Manual and Odour Management Plan.
 - d. perform a quarterly review of operational data from the start of commissioning for the Biofilter including an analysis of critical parameters (including but not limited to all of the parameters identified in this Approval) trends and their comparison to the design/target levels and prepare a report, not later than two (2) weeks after end of the previous quarter and make the report available for inspection by staff of the Ministry upon request.
2. The District Manager may not accept the Odour Management Plan if the requirements of Condition No. 3(1)(b) were not followed.
3. If the District Manager does not accept the Odour Management Plan, the District Manager may require the Odour Management Plan to be revised and re-submitted.
4. The Company shall develop and submit to the District Manager a negative pressure assessment plan, prepared by a Professional Engineer, not later than six (6) months prior to receiving Organic Waste at the Facility or as directed or agreed by the District Manager, for performing negative pressure assessment for the enclosed Receiving Building to identify ideal methodology for achieving and monitoring negative pressure. The plan should include; as a minimum but not limited to:
 - a. drawings showing:
 - i. layout of the Facility;
 - ii. identification of enclosures, if required; and
 - iii. proposed locations for the pressure monitoring sensors for each enclosure;
 - b. details of the monitoring instruments;
 - c. identification of:
 - i. ideal pressure monitoring sensor technology; numbers and location of negative pressure monitoring sensors within the enclosed Receiving Building to avoid false positive readings;
 - ii. weather and other atmospheric impacts;
 - iii. ideal minimum inward capture velocity at the door when a bay door is open; and

- iv. ideal target negative pressure and negative air balance for the enclosed Receiving Building including the need to install any additional fans required to maintain the target negative pressure and negative air balance within the enclosed Receiving Building;
 - d. impacts of bay-door operating practice;
 - e. air changes in the enclosed Receiving Building with a recommendation of minimum air exchanges;
 - f. instrument calibration schedule;
 - g. data collection, logging and reporting frequency;
 - h. alarm levels and triggers;
 - i. consideration of remedial actions if an alarm is triggered;
 - j. an evaluation of the negative pressure and air balance inside the Facility;
 - k. the monitoring period duration for the negative pressure assessment for the enclosed Receiving Building;
 - l. frequency and methodology for performing the negative pressure assessment;
 - m. smoke test;
 - n. detailed evaluation of SCADA system including adequacy and accuracy;
 - o. notification requirement to the District Manager; and
 - p. reporting, including an analysis of the results and recommendations.
5. The Company shall finalize the negative pressure assessment plan in consultation with the District Manager.
6. The Company shall:
- 1. conduct negative pressure assessment for the enclosed Receiving Building not later than three (3) months after acceptance of the negative pressure assessment plan by the District Manager, or as directed or agreed by the District Manager;
 - 2. prepare and submit a report prepared by a Professional Engineer on the negative pressure assessment for the enclosed Receiving Building to the District Manager within two (2) months after completing the negative pressure assessment; and

3. implement the recommendations identified in the negative pressure assessment report within six (6) months after completing the negative pressure assessment or as directed or agreed by the District Manager.
7. The Company shall:
 - a. ensure that all doors in the enclosed Receiving Building are fully closed at all times except when used for necessary personnel and/or vehicle entrance and exit;
 - b. ensure to open only one bay door at any time;
 - c. ensure that the opening and closing of all bay doors within the enclosed Receiving Building is interlocked with the respective exhaust fans and negative pressure control system so that:
 - i. bay doors may only be opened when adequate negative pressure is maintained, and
 - ii. exhaust fans ramp up automatically to prevent fugitive releases of odour:
 - d. ensure that the entire enclosed Receiving Building is maintained under adequate negative pressure (rolling arithmetic average over 1-hour period) as compared to the ambient atmospheric pressure at all times, excluding any time periods of Malfunction; at a magnitude sufficient enough to prevent:
 - a. a migration of the fugitive odour emissions from the Receiving Building to any off-site location; or
 - b. an occurrence of an adverse effect and/or environmental complaint from the public being affected by the said migration of the fugitive odour emissions from the Receiving Building.
 - e. monitor and record the negative pressure and negative air balance for the enclosed Receiving Building (rolling arithmetic average over 1-hour period) every five minutes utilizing negative pressure and negative air balance data every second using a SCADA system;
 8. If at any time, the Company cannot maintain:
 1. adequate negative pressure (rolling arithmetic average over 1-hour period) as compared to the ambient atmospheric pressure or adequate negative air balance (rolling arithmetic average over 1-hour period) for the enclosed Receiving Building; the Company shall:
 - a. notify the District Manager within 24 hours of losing the negative pressure (rolling arithmetic average over 1-hour period) for the enclosed Receiving Building or within the period as directed or agreed to in writing by the District Manager; and

- b. Complete, retain on-Facility and submit to the District Manager, a daily written report within one (1) week of the losing the negative pressure (rolling arithmetic average over 1-hour period) or not able to maintain a minimum adequate negative air balance (rolling arithmetic average over 1-hour period) for the enclosed Receiving Building, listing the results of the investigation, actions taken to resolve the identified cause(s) and any recommendations for remedial measures, and managerial or operational changes to reasonably avoid the recurrence of similar incidents.
9. The Company shall design the Biofilter with minimum three (3) cells, two (2) of which shall be sized to accommodate 100 percent of the necessary flow rate from the Receiving Building such that only two (2) cells are required to operate at any given time.
10. The Company shall not replace the Biofilter media during the period of March 01 to October 31, unless authorized by the District Manager.

4. ACOUSTIC AUDIT

1. The Company shall:
 - a. carry out Acoustic Audit measurements on the actual noise emissions due to the operation of the Facility;
 - b. carry out Acoustic Audit measurements in accordance with the procedures in Ministry Publication NPC-103;
 - c. submit an Acoustic Audit Report on the results of the Acoustic Audit, prepared by an Independent Acoustical Consultant, in accordance with the requirements of Ministry Publication NPC-233, to the District Manager and the Director, no later than 12 months after the Facility has commenced operations.
2. The Director:
 - a. may not accept the results of the Acoustic Audit if the requirements of Ministry Publication NPC-233 were not followed; and
 - b. may require the Company to repeat the Acoustic Audit if the results of the Acoustic Audit are found unacceptable to the Director.

5. SOURCE TESTING

1. The Company shall submit to the Manager a test protocol not later than three (3) months after receiving Organic Waste at the Facility, including the Pre-Test Information for the Source Testing required by the Source Testing Code. The Company shall finalize the test protocol in consultation with the Manager.

2. The Company shall not perform Source Testing required under this Approval until the Manager has accepted the test protocol.
3. The Company shall complete the Source Testing not later than six (6) months after acceptance of the test protocol by the Manager, or within a period as directed or agreed by the Manager, in consultation with the District Manager.
4. The Company shall repeat the Source Testing once every year or as directed or agreed by the District Manager.
5. The Company shall notify the Director, the District Manager and the Manager in writing of the location, date and time of any impending Source Testing required by this Approval, at least fifteen (15) days prior to the Source Testing.
6. The Company shall submit a report, whenever Source Testing is completed, on the Source Testing to the Director, the District Manager and the Manager not later than three (3) months after completing the Source Testing. The report shall be in the format described in the Source Testing Code, and shall include, but not be limited to:
 - a. an executive summary including the results from the Source Testing;
 - b. records of weather conditions such as ambient temperature and relative humidity, wind speed and direction, and any environmental complaints if received, at the time of the Source Testing;
 - c. all operating conditions of the Facility at the time of the Source Testing including the quantity of Amendment Material in the Facility, the quantity of Organic Waste received, the quantity of Organic Waste on the tipping floor, the quantity of materials in the composting and curing windrows, volumetric flow rate to the Biofilter, and the operating conditions including any upset conditions for the Biofilter at the time of the Source Testing;
 - d. a tabular comparison of Source Testing results for odour to original emission estimates described in the Company's application and the ESDM Report;
 - e. the results of dispersion calculations employing the AERMOD dispersion model that employs at least five (5) years of hourly local meteorological data, and using the average of the results of the Source Testing, to indicate the maximum 10-minute average concentrations of odour, hydrogen sulphide and total mercaptans at the Point of Impingement and the most impacted Sensitive Receptor, computed in accordance with SCHEDULE "A",
 - f. the results of dispersion calculations employing the AERMOD dispersion model that employs at least five (5) years of hourly local meteorological data, and using the average of the results of the Source Testing, to indicate the maximum concentration of ammonia at the Point of Impingement, and

- g. comparison of the 10-minute average concentration of odour at the most impacted Sensitive Receptor, with the predicted 10-minute average concentration of odour at the most impacted Sensitive Receptor in the Original ESDM Report.

7. The Director may not accept the results of the Source Testing if:

- a. the Source Testing Code or the requirements of the Manager were not followed, or
- b. the Company did not notify the Director, the District Manager and the Manager of the Source Testing, or
- c. the Company failed to provide a complete report on the Source Testing.

8. If the Director does not accept the results of the Source Testing, the Director may require re-testing. If re-testing is required, the Pre-Test Plan strategies need to be revised and submitted to the Manager for approval. The actions taken to minimize the possibility of the Source Testing results not being accepted by the Director must be noted in the revision.

9. The Company shall update their ESDM Report in accordance with Section 26 of O. Reg. 419/05 and the Procedure Document with the results from the Source Testing if any of the calculated emission factors or calculated emission rates are higher than the predicted rates in the ESDM Report, not later than three (3) months after the submission of the Source Testing report and make these records available for review by staff of the Ministry upon request.

6. COMPLAINTS / ODOUR-CONTAMINANT EMISSIONS RESPONSE PROCEDURE

1. If at any time, the Company receives any environmental complaints from the public regarding the operation of the Facility, the Company shall respond to these complaints in accordance with the Complaint Management Procedure contained in Condition No. 9 in the Company's Approval (Waste).

7. ANNUAL COMPLIANCE REPORT

- 1. The Company shall submit to the District Manager, by March 31, each year, an annual Compliance Report, prepared by a Professional Engineer detailing:
 - a. compliance with all terms and conditions of this Approval, Approval (Waste) and EPA;
 - b. a detailed description of the measures taken to ensure compliance with all terms and conditions of this Approval and EPA;
 - c. a detailed description of:

- i. non-compliance with any terms and conditions of this Approval, Approval (Waste) and EPA and;
 - ii. how and when any non-compliance was corrected;
2. The Compliance Report shall be signed by a person designated by the Company.
3. The Company shall ensure that copies of the Compliance Report are available for inspection at the Facility by any member of the public during normal business hours without charge.

8. 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 operation, maintenance and monitoring activities required by this Approval. These records shall be made available to staff of the Ministry upon request. The Company shall retain:
 - a. all records on the maintenance, repair and inspection of the Facility and Equipment;
 - b. all records of the monitored parameters as required by this Approval;
 - c. all records of fan failure such that there is no process air flow through the Biofilter;
 - d. all records on the:
 - i. daily, monthly and annual quantities of incoming Organic Waste and Amendment Material;
 - ii. quantity of the Organic Waste, Amendment Material and recycled materials in the Phase 1 and Phase 2 windrows on the day the windrow is loaded;
 - iii. all records on the processing time (residence time) of organic waste mix in Phase 1, Phase 2 windrows including total time for each pass;
 - e. all reports of the Source Testing;
 - f. all measures taken to minimize odour emissions from all potential sources; and
 - g. all records on environmental complaints and record created in accordance with condition No. 6(1) of the Approval.

9. TECHNOLOGY BENCHMARKING REPORT

1. The District Manager may, at their discretion, require the Company in writing to prepare a Technology Benchmarking Report.

2. Subject to Condition 9.1:

- a. The Company shall submit to the Director a Technology Benchmarking Report prepared by a Professional Engineer to identify feasible options to reduce off-property odour impacts, no later than three (3) months after the date of the written request from the District Manager.
- b. The Technology Benchmarking Report should, at a minimum, include the following:
 - i. a comprehensive list of all control methods for odour impact reduction based on the following:
 - A. a comparison of methods used by other facilities in the same or similar industrial sector;
 - B. a review of emission control requirements and strategies from other jurisdictions; and
 - C. where applicable, transfer of technologies from other sectors with similar issues, including preventative steps such as material substitutions, process changes and add-on controls or treatment methods;
 - ii. an evaluation of the technical feasibility of the identified control options individually, and where applicable, control options in combination. This evaluation will include the availability and applicability of the option to the odour source, technical considerations, and any site specific considerations;
 - iii. a ranking of feasible options, or option combinations with an assessment of predicted impact reductions at Sensitive Receptors for major sources and waste facility emissions including percent contribution, maximum and average odour concentrations and frequency assessment at Sensitive Receptors, and compared to current operations;
 - iv. recommendations based on current odour impact assessment, predicted reductions that can be achieved by implementing feasible options, timelines, approval requirements and other applicable considerations.
- c. The Company shall update and/or implement the recommendations of the Technology Benchmarking Report as directed by the District Manager.

10. 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"

Procedure to calculate and record the 10-minute average concentration of odour at the Point of Impingement and at the most impacted Sensitive Receptor

1. Calculate and record one-hour average concentration of odour at the Point of Impingement and at the most impacted Sensitive Receptor, employing the AERMOD atmospheric dispersion model or any other model acceptable to the Director, that employs at least five (5) years of hourly local meteorological data and that can provide results reported as individual one-hour average odour concentrations;
2. Convert and record each of the one-hour average concentrations predicted over the five (5) years of hourly local meteorological data at the Point of Impingement and at the most impacted Sensitive Receptor to 10-minute average concentrations using the One-hour Average to 10-Minute Average Conversion described below; and
3. Record and present the 10-Minute Average concentrations predicted to occur over a five (5) year period at the Point of Impingement and at the most impacted Sensitive Receptor in a histogram. The histogram shall identify all predicted 10-minute average odour concentration occurrences in terms of frequency, identifying the number of occurrences over the entire range of predicted odour concentration in increments of not more than 1/10 of one odour unit. The maximum 10-minute average concentration of odour at the Sensitive Receptor will be considered to be the maximum odour concentration corresponding to 99.5% of the time in the 5 year modelling period at the most impacted Sensitive Receptor. If elimination of meteorological anomalies in accordance with the section 6.5 of the ministry's document titled "Air Dispersion Modelling Guideline for Ontario" dated February 2017, as amended is considered before considering frequency, only those anomalies per year of meteorology over the full modelling grid as required under section 14 of O. Reg. 419/05 shall be removed.
4. Use the following formula to convert and record one-hour average concentrations at the Point of Impingement and at the most impacted Sensitive Receptor to 10-minute average concentrations:

$$X_{10min} = X_{60min} * 1.65$$

where X_{10min} = 10-minute average concentration
 X_{60min} = one-hour average concentration

(Equation: X Subscript 10 min Baseline equals X Subscript 60 min Baseline times 1.65, where X Subscript 10 min Baseline equals 10-minute average concentration and X Subscript 60 min Baseline equals one-hour average concentration.)

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

1. Conditions No. 1 to 2, inclusive, are included to provide the minimum performance requirements

considered necessary to prevent an adverse effect resulting from the operation of the Facility.

2. Condition No. 3 is included to emphasize that the Equipment and the Facility must be maintained and operated according to a procedure that will result in compliance with the EPA, the regulations and this Approval.
3. Conditions No. 4 to 7, inclusive, are included to require the Company to gather accurate information so that compliance with the EPA, the regulations and this Approval can be verified.
4. Condition No. 4.2 is included to ensure the Acoustic Audit is carried out in accordance with procedures set out in the Ministry's Noise Guidelines.
5. Condition No. 8 is included to require the Company to retain records and provide information to the Ministry so that compliance with the EPA, the regulations and this Approval can be verified.
6. Condition No. 9 is included to require the Company to provide information to the Ministry on the efforts of the Company in minimizing odourous emissions relative to industry best practices.
7. Condition No. 10 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

and

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

and

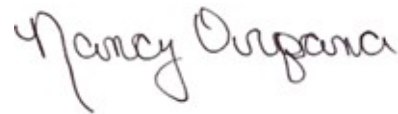
The Director appointed for the purposes of
Part II.1 of the *Environmental Protection Act*
Ministry of the Environment,
Conservation and Parks
135 St. Clair Avenue West, 1st Floor
Toronto, Ontario

* **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 12th day of May, 2026



Nancy E Orpana, P.Eng.

Director

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

BS/

c: District Manager, MECP Hamilton - District
Matthew Griffin, GHD