ENVIRONMENTAL COMPLIANCE APPROVAL
NUMBER 9103-DWTNS2
Issue Date: September 30, 2026

DSLR Inc.
37 Advance Rd
Toronto, Ontario
M8Z 2S6

Site Location: PCL 1-7, SEC D6 PT Unit 1, PL D6
Part PCL 1-7, SEC D6 PT Unit 1, PL D6, Plan Part 1,
9R6241
Thorold City, Regional Municipality of Niagara
L0S 1A0

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:

a 6.07 ha waste disposal site (processing and transfer).

to be used for the the following types of industrial wastes:
industrial process residuals consisting primarily of silicon carbide sand, ferrosilicon, aluminium oxide fines (brown fused alumina), dust collector fines (alumina), alumina scrap, and high clay alumina.

Note: Use of the site for any other type of waste is not approved under this environmental compliance approval, and requires obtaining a separate approval amending this environmental compliance approval.

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

1. "Adverse Effect" has the same meaning as defined in section 1 of the EPA;

2. "Approval" means this entire Environmental Compliance Approval document, and includes any schedules to it, the application and the supporting documentation listed in Schedule "A";

3. "contaminant" has the same meaning as defined in section 1 of the EPA;

4. "Director" means a person appointed by the Minister pursuant to section 5 of the EPA for the purposes of Part II.1 of the EPA;

5. "District Manager" means the District Manager of the local district office of the Ministry in which the Site is

geographically located;

6. "EPA" means the Environmental Protection Act, R.S.O. 1990, C.E-19, as amended;

7. "Minister" means the Minister of the Ministry or such other member of the Executive Council as may be assigned the administration of the EPA and OWRA under the Executive Council Act, R.S.O. 1990, c. E.25;

8. "Ministry" means the ministry of the Minister and includes all, employees or other persons acting on its behalf;

9. "Operator" means any person, other than the Owner's employees, authorized by the Owner as having the charge, management or control of any aspect of the Site;

10. "Owner" means DSLR Inc., including its employees, having the charge, management, control and operation of any aspect of the Site and includes its successors and assigns;

11. "OWRA" means the Ontario Water Resources Act, R.S.O. 1990, c. O.40;

12. "PA" means the Pesticides Act, R.S.O. 1990, c. P.11;

13. "Provincial Officer" means any person designated in writing by the Minister as a provincial officer pursuant to section 5 of the OWRA or section 5 of the EPA or section 17 of PA;

14. "Regulation 347" or "Reg. 347" means Revised Regulations of Ontario 1990, Regulation 347: (General - Waste Management), made under the EPA;

15. "Site" means the waste disposal site (transfer and processing) located at PCL 1-7, SEC D6 PT Unit 1, PL D6 Part PCL 1-7, SEC D6 PT Unit 1, PL D6, Plan Part 1, 9R6241, Thorold City, Regional Municipality of Niagara
L0S 1A0; and

16. "Trained Personnel" means persons knowledgeable in the following through instruction and/or practice:

    i. relevant waste management legislation, regulations and guidelines;
    ii. major environmental concerns pertaining to the waste to be handled;
    iii. occupational health and safety concerns pertaining to the processes and wastes to be handled;
    iv. management procedures including the use and operation of equipment for the processes and wastes to be handled;
    v. records keeping procedures;
    vi. emergency response procedures;
    vii. specific written procedures for the control of nuisance conditions;
    viii. specific written procedures for refusal of unacceptable waste loads;
    ix. the requirements of this Approval.

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

conditions outlined below:

TERMS AND CONDITIONS

1.0 Compliance

1.1 The Owner and Operator shall ensure compliance with all the conditions of this Approval, ensure that any person authorized to carry out work on or operate any aspect of the Site is notified of this Approval and the conditions herein, and take all reasonable measures to ensure any such person complies with the same.

1.2 Any person authorized to carry out work on or operate any aspect of the Site shall comply with the conditions of this Approval.

1.3 The Site shall be operated and maintained at all times, including management and disposal of all waste, in accordance with the EPA, Reg. 347 and the conditions of this Approval. At no time shall the discharge of a contaminant that causes or is likely to cause an Adverse Effect be permitted.

2.0 Design, Develop, Build, Operate, Modify and Maintain in Accordance

2.1 Except as otherwise provided for in this Approval, the Site shall be designed, developed, built, operated, modified and maintained in accordance with the application and supporting documentation for this Approval dated August 29, 2025 listed in Schedule "A".

2.2 The Site shall be constructed and the approved equipment shall be installed and must commence operation, within five (5) years commencing September 30, 2026, after which time the Approval ceases to apply in respect of any portions of the Site not in operation. In the event that the construction, installation and/or operation of any portion of the Site is anticipated to be delayed beyond the time period stipulated, the Owner shall submit to the Director an application to amend the Approval to extend this time period, at least six (6) months prior to the end of the period. The amendment application shall include the reason(s) for the delay and whether there is any design change(s).

3.0 Interpretation

3.1 Where there is a conflict between a provision of any document, including the application, referred to in this Approval, and the conditions of this Approval, the conditions in this Approval shall take precedence.

3.2 Where there is a conflict between the application and a provision in any documents listed in Schedule "A", the application shall take precedence, unless it is clear that the purpose of the document was to amend the application and that the Ministry approved the amendment.

3.3 Where there is a conflict between any two documents listed in Schedule "A", other than the application, the document bearing the most recent date shall take precedence.

3.4 The requirements of this Approval are severable. If any requirement of this Approval, or the application of any requirement of this Approval to any circumstance, is held invalid or unenforceable, the application of such requirement to other circumstances and the remainder of this Approval shall not be affected thereby.

4.0 Other Legal Obligations

4.1 The issuance of, and compliance with, this Approval does not:

a. relieve any person of any obligation to comply with any provision of any applicable statute, regulation or other legal requirement including, but not limited to:

i. obtaining site plan approval from the local municipal authority;

ii. obtaining all necessary building permits from the local municipal authority Building Services Division;

iii. obtaining any necessary or applicable approvals from the Chief Fire Prevention Officer, local municipal authority; or

b. limit in any way the authority of the Ministry to require certain steps be taken or to require the Owner and Operator to furnish any further information related to compliance with this Approval.

5.0 Adverse Effect

5.1 The Owner and Operator shall take steps to minimize and ameliorate any Adverse Effect on the natural environment or impairment of water quality resulting from the Site, including such accelerated or additional monitoring as may be necessary to determine the nature and extent of the effect or impairment.

5.2 Despite an Owner, Operator or any other person fulfilling any obligations imposed by this Approval, the Owner, Operator or any other person remains responsible for any contravention of any other condition of this Approval or any applicable statute, regulation, or other legal requirement resulting from any act or omission that caused the Adverse Effect to the natural environment or impairment of water quality.

6.0 Change of Owner

6.1 The Owner shall notify the Director in writing, and forward a copy of the notification to the District Manager, within thirty (30) business days of the occurrence of any changes:

a. the ownership of the Site;

b. the Operator of the Site;

c. the address of the Owner or Operator;

d. the partners, where the Owner is or at any time becomes a partnership and a copy of the most recent declaration filed under the Business Names Act, R.S.O. 1990, c. B-17 shall be included in the notification; and

e. the name of the corporation where the Owner 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.

6.2 No portion of this Site shall be transferred or encumbered prior to or after closing of the Site unless the Director is notified in advance and sufficient financial assurance is deposited with the Ministry to ensure that these conditions will be carried out.

6.3 In the event of any change in ownership of the Site, the Owner shall notify within thirty (30) business days, in writing, the succeeding owner of the existence of this Approval, and a copy of such notice shall be forwarded to the Director.

7.0 Financial Assurance

7.1 Within twenty (20) calendar days of issuance of this Approval, the Owner shall submit to the Director, Financial Assurance in the amount of **$2,250,000.00**. This Financial Assurance shall be submitted in a form acceptable to the Director and shall provide sufficient funds for site clean-up, monitoring, and the analysis, transportation and disposal of all quantities of waste permitted to be on-site at any one time.

7.2 Commencing on October 1, 2031 and at intervals of five (5) years thereafter, the Owner shall submit to the Director, a re-evaluation of the amount of Financial Assurance to implement the actions required under Condition 7.1. The re-evaluation shall include an assessment based on any new information relating to the environmental conditions of the Site and shall include the costs of additional monitoring and/or implementation of contingency plans required by the Director upon review of the closure plan and annual reports. The Financial Assurance must be submitted to the Director within thirty (30) calendar days of written acceptance of the re-evaluation by the Director.

7.3 The amount of Financial Assurance is subject to review at any time by the Director and may be amended at their discretion.

7.4 If any Financial Assurance is scheduled to expire or notice is received, indicating Financial Assurance will not be renewed, and satisfactory methods have not been made to replace the Financial Assurance at least sixty (60) calendar days before the Financial Assurance terminates, the Financial Assurance shall forthwith be replaced by cash.

8.0 Inspections

8.1 No person shall hinder or obstruct a Provincial Officer from carrying out any and all inspections authorized by the OWRA, the EPA, or the PA, of any place to which this Approval relates, and without

limiting the foregoing:

a. to enter upon the premises where the approved works are located, or the location where the records required by the conditions of this Approval are kept;

b. to have access to, inspect, and copy any records required to be kept by the conditions of this Approval;

c. to inspect the Site, related equipment and appurtenances;

d. to inspect the practices, procedures, or operations required by the conditions of this Approval; and

e. to sample and monitor for the purposes of assessing compliance with the terms and conditions of this Approval or the EPA, the OWRA or the PA.

9.0 Information and Record Retention

9.1 Any information requested, by the Ministry, concerning the Site and its operation under this Approval, including but not limited to any records required to be kept by this Approval shall be provided to the Ministry, upon request**,** in a timely manner.

9.2 The receipt of any information by the Ministry or the failure of the Ministry to prosecute any person or to require any person to take any action, under this Approval or under any statute, regulation or other legal requirement, in relation to the information, shall not be construed as:

a. an approval, waiver, or justification by the Ministry of any act or omission of any person that contravenes any term or condition of this Approval or any statute, regulation or other legal requirement; or

b. acceptance by the Ministry of the information's completeness or accuracy.

9.3 All records required by the conditions of this Approval must be retained on Site for a minimum period of two (2) years from the date of their creation.

9.4 Any information relating to this Approval and contained in Ministry files may be made available to the public in accordance with the provisions of the Freedom of Information and Protection of Privacy Act, R.S.O. 1990, C. F-31.

10.0 Service Area and Hours of Operation

10.1 Only existing waste from the former Exolon property located at 181 Queen St South, Thorold may be processed at the Site.

10.2 Notwithstanding Condition 10.1, the Site can receive additional aluminum oxide for the purpose of blending with silicon carbide waste so long as the maximum storage quantity in stated in Condition 13.1

is not exceeded.

10.3 a. Waste may be received, processed, and shipped from the Site between 7:00 am and 7:00 pm, Monday to Saturday, unless otherwise restricted by municipal by-laws.

b. All other Site operations, except for waste receipt and shipment, may take place 24 hours a day, 7 days a week, unless otherwise restricted by municipal by-laws.

11.0 Signage and Security

11.1 Prior to the processing and shipping of any waste at the Site, the Owner shall install a sign at the main entrance/exit of the Site on which the following information shall be legibly displayed:

a. name of the Owner;

b. this Approval number;

c. hours during which the Site is open;

d. waste types that are approved to be accepted at the Site;

e. Owner's telephone number to which complaints may be directed;

f. Ministry's telephone number to which complaints may be directed;

g. Owner's twenty-four hour emergency telephone number (if different from above);

h. a warning against unauthorized access; and

i. a warning against dumping at the Site.

11.2 The Site shall be operated and maintained in a secure manner, such that unauthorized persons cannot enter the site. During non-operating hours, the Site gates shall be locked and secured against access by unauthorized persons.

12.0 Approved Waste Types

12.1 The Owner shall ensure that the only wastes processed at the site are silicon carbide sand, ferrosilicon, aluminium oxide fines (brown fused alumina), dust collector fines (alumina), alumina scrap, and high clay alumina.

12.2 The Owner shall ensure:

a. all incoming loads are inspected by Trained Personnel to ensure only approved waste is received at

this Site.

b. If any incoming waste load is known to contain unapproved waste, or is discovered to contain unapproved waste during receipt, that load shall be rejected.

c. If any unapproved waste is discovered on-site, that waste shall be immediately removed from the Site for disposal in accordance with the EPA and Reg. 347.

12.3 The Owner shall ensure that Trained Personnel is/are on duty at all times when the Site is open to ensure proper supervision of all waste activities.

13.0 Approved Waste Quantities

13.1 The quantity of waste shall not exceed 76,400 tonnes at any time.

14.0 Waste Storage and Processing

14.1 The Owner shall ensure that all waste is stored, processed and transferred in a manner that does not result in a nuisance or an Adverse Effect.

14.2 The waste management activities approved at the site include the blending and transfer of waste.

14.3 Any waste received in one (1) m^3 sealed bulk sacks or sealed containers shall be stored on wooden pallets to reduce the potential for dispersion of fine material by wind or water.

14.3 The Owner shall ensure that the sealed bulk sacks or containers are kept secure and closed at all times except during loading, unloading, or other activities authorized by this Approval. Any damaged or defective storage sack or container shall be promptly repaired or replaced.

15.0 Site Waste Storage and Processing Areas

15.1 All waste storage and processing areas at the Site shall be clearly identified.

16.0 Truck Traffic

16.1 The Owner shall ensure that there is no queuing or parking of vehicles that are waiting to enter this Site on any roadway that is not part of this Site.

16.2 The Owner shall ensure that all vehicles transporting waste to and from the Site use the designated on-Site traffic routes.

16.3 The Owner shall ensure that all vehicles hauling waste are adequately covered to prevent fugitive odour or dust emissions during transport.

16.4 The Owner shall take all necessary measures to prevent the vehicles leaving the Site from dragging out

mud or waste onto the public roadways and promptly clean up any dragged out mud or waste if drag-out occurs.

17.0 Nuisance Control

17.1 The Owner shall operate and maintain the Site such that the dust, odours, vectors, vermin, rodents, litter, vibration, noise and traffic do not create a nuisance.

17.2 If at any time problems such as odours, dust, litter, noise, vectors, vermin, rodents or other nuisances are generated at the Site, the Owner shall take appropriate, immediate remedial action to eliminate the problem. Appropriate measures may include the removal of waste from the Site and temporary stoppage of all operations until the problem has been rectified and measures have been undertaken to prevent future occurrence.

17.3 If at any time dust becomes a nuisance, the Owner shall implement an approach satisfactory to the District Manager, which shall detail all practical steps to control dust at the Site.

17.4 If at any time odours are generated at the Site resulting in complaints, the Owner shall implement appropriate actions, including the removal of waste from the Site and the temporary stoppage of all waste management activities at the Site until the problem has been rectified and measures have been undertaken to prevent future occurrence.

18.0 Other Approvals

18.1 The Site shall not be operated unless all Approvals under the EPA and OWRA, where applicable, have been obtained, including Air, Noise and Sewage Works Approvals.

19.0 Stormwater and Erosion Management

19.1 The Owner shall ensure that the Site is graded and/or constructed and maintained in good order such that surface water runoff is diverted away from waste storage areas.

19.2 The Owner shall install and maintain heavy duty silt fencing outlined in Section 3.4 and Figure 1 - Site Plan of the "Supporting Documentation for ECA Application Exolon Blending and Recycling Site Allanport Road, Thorold Ontario" provided in Item 1 of Schedule A and Ontario Provincial Standard Drawing 219.130, or otherwise determined by the District Manager, where necessary to prevent the off-Site migration of waste impacted sediment and waste-laden surface water.

19.3 The silt fencing shall:

a. be installed prior to commencing waste processing activities or other activities that may result in the generation or migration of sediments;

b. be installed in accordance with the manufacturer's specifications and good engineering and environmental practices;

c. be securely anchored into the ground and installed in a manner that prevents the passage of sediment beneath or around the silt fencing;

d. be installed with sufficient overlap, anchoring and end treatment to prevent the bypass of sediment-laden surface water;

e. be supplemented or replaced with additional sediment and erosion control measures where, in the opinion of the Owner, the silt fencing alone is not sufficient to prevent the migration of sediment from the Site; and

f. extend a minimum of three (3) metres beyond the eastern extent of the waste storage areas on both the northern and southern property boundaries towards Allanport Road.

19.4 The Owner shall inspect the silt fencing:

a. at a minimum of at least once per month, with a minimum of 21 day between inspections;

b. following significant rainfall events; and

c. whenever Site conditions indicate that the silt fencing may have been damaged, displaced or rendered ineffective.

19.5 The Owner shall promptly repair, reinforce or replace any section of silt fencing that is damaged, displaced, undermined, clogged with sediment, or otherwise no longer functioning effectively.

19.6 Accumulated sediment shall be removed when it is greater than 200 mm in depth or when necessary to maintain the effectiveness of the control measure. Removed sediment shall be managed in accordance with all applicable legislation.

19.7 The Owner shall ensure that silt fencing remains in place and functional for the duration of activities at the Site that have the potential to generate or transport sediment. Unless approved by the District Manager, silt fencing shall not be removed, relocated or modified unless suitable alternative sediment and erosion control measures are in place or the silt fencing is no longer required to prevent the migration of sediment from the Site.

19.8 Where an inspection identifies a failure or deficiency in the silt fencing, the Owner shall take immediate corrective action to prevent the release or further migration of sediment from the Site.

19.9 In the event sediment has migrated beyond the Site as a result of a failure of the sediment control measures, the Owner shall undertake appropriate measures to contain, collect and manage the released sediment and shall restore affected areas.

19.10 The Owner shall maintain a record of inspections and any maintenance or corrective actions undertaken and be included in the annual report required by Condition 26.5 of this Approval.

20.0 Operations Manual

20.1 Prior to the first receipt of waste at the Site, the Owner shall prepare an Operations Manual for use by the Trained Personnel. As a minimum, the Operations Manual shall contain the following:

a. an outline of the responsibilities of Trained Personnel;

b. training protocols;

c. waste receiving and screening procedures;

d. waste unloading, handling, and storage procedures;

e. sampling and testing procedures;

f. Site inspections, spill, fire, upset and leakage recording procedures under the procedure for handling complaints, Dust Best Management Practices Protocol, and Odour Best Management Practices Protocol as described in this Approval.

20.2 A copy of the Operations Manual shall be kept at the Site, must be accessible to all personnel at all times and must be updated, as required.

21.0 Site Inspections

21.1 Trained Personnel shall carry out a monthly inspection of the entire Site to ensure that:

a. the Site is secure;

b. no unapproved waste is present at the Site;

c. the operation of the Site is not the cause of any nuisances or Adverse Effects;

d. all facilities are in good working order and operated in a manner that will not negatively impact the environment;

e. waste storage, unloading and loading areas are orderly; and

f. the Site is being operated in compliance with this Approval.

21.2 Any deficiencies discovered as a result of an inspection carried out under Condition 21.1 shall be remedied immediately, with corrective measures including temporarily ceasing operations at the Site

and/or removing all waste from the Site as necessary.

22.0 Complaints

22.1 If at any time the Owner receives complaints regarding the operation of the Site, the Owner shall respond to these complaints according to the following procedure:

a. The Owner shall record and number each complaint, either electronically or in a log book, and shall include the following information:

i. the nature of the complaint;

ii. the name, address and the telephone number of the complainant if the complainant will provide this information;

iii. the time and date of the complaint;

iv. weather conditions at the time of the complaint; and

v. Site operations being carried out at the time of the complaint.

b. The Owner shall inform the District Manager and the Ministry's Spills Action Centre of the complaint forthwith.

c. The Owner shall initiate appropriate steps to determine all possible causes of the complaint, proceed to take the necessary actions to eliminate the cause of the complaint and forward a formal reply to the complainant within one (1) week of the complaint date.

d. The Owner shall provide the District Manager with a report written within one (1) week of the complaint date, listing the actions taken regarding the complaint and any recommendations for remedial measures, and managerial or operational changes to reasonably avoid the recurrence of similar incidents.

23.0 Spill Response and Contingency Measures

23.1 All spills, as defined in the EPA, shall be immediately reported to the Ministry's Spills Action Centre at 1-800-268-6060.

23.2 Should a Spill occur at the Site, in addition to fulfilling the requirements from the EPA, the Owner shall submit to the District Manager a written report within seven (7) calendar days outlining the nature of the Spill, remedial measure taken and the measures taken to prevent future occurrences at the Site.

23.3 The Owner shall implement and maintain an Emergency Response and Contingency Plan for the Site. This Plan shall include, but not necessarily be limited to:

a. maps and drawings showing the location, maximum quantity and types of all waste stored at the Site;

b. emergency response procedures to be undertaken in the event of a spill, fire, natural disaster, medical emergency or process upset;

c. a list of equipment and spill clean up materials available in case of an emergency;

d. contingency procedures to be followed in the event of equipment malfunction, a labour disruption, transportation disruption, inability of receiving sites to accept waste or other business disruption to the operation;

e. notification protocol with names and telephone numbers of persons to be contacted, including persons responsible for the Site, the Ministry's District Office and Spills Action Centre, the local municipal fire department, the City of Thorold, the Regional Municipality of Niagara, the local Medical Officer of Health, the Ministry of Labour, and the names and telephone numbers of companies available for emergency response.

23.4 The equipment, materials and personnel requirements outlined in the Emergency Response and Contingency Plan are required to be kept on Site and shall be immediately available on the Site at all times. The equipment shall be kept in a good state of repair and in a fully operational condition.

23.5 An up-to-date version of the Emergency Response and Contingency Plan shall be kept at the Site at all times, in a central location available to all staff, and shall be available for inspection by a Provincial Officer upon request.

23.6 The Owner shall ensure that all operating personnel are fully trained in the use of the contingency equipment and materials outlined in the Emergency Preparedness and Response Plan, and in the procedures to be employed in the event of an emergency.

23.7 The Owner shall promptly take all necessary steps to contain and clean up any spills or upsets which result from this operation.

23.8 Within 30 days of the date of issuance of this Approval, the Owner shall submit a Fire Safety Plan to the local fire department for their review. A copy of the Fire Safety Plan accompanied by written concurrence of the plan from the fire department shall be retained on-site and shall be made available to any Provincial Officer upon request.

24.0 Training

24.1 A training plan shall be developed and maintained for all employees that operate the Site. Only Trained Personnel may operate the Site or carry out any activity required under this Approval.

24.2 The Owner shall ensure that Trained personnel are available at all times during the hours of operation of this Site. Trained personnel shall supervise all transfer and processing of waste material at the Site.

25.0 Environmental Monitoring

Compliance

25.1 The Site shall be operated in such a way as to ensure compliance with the following:

a. Reasonable Use Guideline B-7 for the protection of the groundwater at the Site; and

b. Provincial Water Quality Objectives included in the July 1994 publication entitled Water Management Policies, Guidelines, Provincial Water Quality Objectives, as amended from time to time or limits set by the Regional Director, or the Canadian Water Quality Guidelines published by the Canadian Council of Ministers of the Environment, 1999 for the protection of the surface water at and off the Site.

Monitoring Plan

25.2 The Owner shall retain qualified professionals to conduct the groundwater and surface water monitoring program as summarized in Schedule "B".

Groundwater Wells and Monitors

25.3 The Owner shall ensure that all groundwater monitoring wells which form part of the monitoring program are properly capped, locked and protected from damage.

25.4 Any groundwater monitoring well included in the on-going monitoring program that are damaged shall be assessed, repaired, replaced or decommissioned by the Owner, as required.

(a) The Owner shall repair or replace any monitoring well which is destroyed or in any way made to be inoperable for sampling such that no more than one regular sampling event is missed.

(b) All monitoring wells which are no longer required as part of the groundwater monitoring program, and have been approved by the District Manager for abandonment, shall be decommissioned by the Owner, as required, in accordance with Regulation 903, that will prevent contamination through the abandoned well. A report on the decommissioning of the well shall be included in the Annual Report for the period during which the well was decommissioned.

Contingency Plans

25.5 Should surface water monitoring results at a given location meet or exceed PWQOs for two (2) consecutive sampling events, then a focussed technical assessment shall be completed and included as part of the Annual Report for the Site. The focussed technical assessment shall include the likely cause for the exceedance, requirements for enhanced monitoring, as needed, and corrective actions as needed including improved environmental control systems and/or modifications to Site operating procedures and practices.

Changes to the Monitoring Plan

25.6 The Owner may request to make changes to the monitoring program(s) to the District Manager in accordance with the recommendations of the annual report. The Owner shall make clear reference to the proposed changes in separate letter that shall accompany the annual report.

25.7 Within thirty (30) days of receiving the written correspondence from the District Manager confirming that the District Manager is in agreement with the proposed changes to the environmental monitoring program, the Owner shall forward a letter identifying the proposed changes and a copy of the correspondences from the District Manager and all other correspondences and responses related to the changes to the monitoring program, to the Director requesting the Approval be amended to approve the proposed changes to the environmental monitoring plan prior to implementation.

25.8 In the event any other changes to the environmental monitoring program are proposed outside of the recommendation of the annual report, the Owner shall follow current ministry procedures for seeking approval for amending the Approval.

26.0 Reporting

26.1 The Owner shall maintain an on-site written or digital record of daily activities undertaken at the Site. All measurements shall be recorded in consistent metric units of measurement. The record shall include, as a minimum, the following:

a. date of record;

b. types, quantities and source of waste received at the Site that day;

c. quantity and type of the waste present at the Site at the end of each operating day;

d. types, quantities and destination of waste shipped from the Site that day;

e. the source, waste type and quantity of any waste rejected and the reason for the rejection; and

f. a description of any problems, upsets, spills, or complaints which occurred on the date of record and any remedial actions undertaken to mitigate or prevent a recurrence.

26.2 The Owner shall maintain an on-Site written or digital record of the emergency situations, including the situations mentioned in Condition 23.3. The record shall include, as a minimum, the following:

a. the type of emergency situation;

b. description of how the emergency situation was handled;

c. the type and amount of material spilled, if applicable;

d. a description of how the material was cleaned up and stored, if generated; and

e. the location and time of final disposal, if applicable.

26.3 The Owner shall maintain an on-Site written or digital record of inspections as required by this Approval. The record shall include, as a minimum, the following:

a. the name and signature of the Trained Personnel that conducted the inspection;

b. the date and time of the inspection;

c. the list of any deficiencies discovered;

d. the recommendations for remedial action; and

e. the date, time and description of actions taken.

26.4 The Owner shall maintain an on-Site written or digital record of training as required by this Approval. The record shall include, as a minimum, the following:

a. date of training;

b. name and signature of person who has been trained; and

c. description of the training provided.

26.5 By March 31st following the end of each operating year, the Owner shall prepare and maintain on-site an Annual Report summarizing the operation of the Site covering the previous calendar year. This Annual Report shall include, as a minimum, the following information:

a. a detailed monthly summary of the type and quantity of all incoming and outgoing wastes and an estimate of total tonnages remaining on-Site by waste type as of December 31st each year;

b. dates and quantities of blending and loading operations at the Site

c. a site plan with all active storage areas identified;

d. a summary and interpretation of surface water and groundwater results;

e. any environmental and operational problems, that could negatively impact the environment, encountered during the operation of the Site or during Site inspections and any mitigative actions taken;

f. any recommendations to minimize environmental impacts from the operation of the Site and to

improve Site operation and monitoring programs in this regard;

g. a summary of any complaints received and the responses made;

h. a summary of all inspections and maintenance carried out at the Site;

i. a written statement that the Site was in compliance with the Approval; and

j. any other information the District Manager requires from time to time.

26.6 Prior to commencing operations at the Site, the Owner shall submit an up-to-date Design and Operations Report and as-built drawings to the Director and District Manager.

27.0 Closure

27.1 The Owner shall submit, for approval by the Director, a written Closure Plan six (6) months prior to the permanent closure of the Site. This plan must include, at a minimum, a description of the work that will be done to facilitate closure of the Site and a schedule for completion of that work.

27.2 Within ten (10) business days after closure of the Site, the Owner must notify the Director and District Manager, in writing, that the Site is closed and that the Closure Plan has been implemented.

Schedule "A"

This Schedule "A" forms part of this Approval.

1. Environmental Compliance Approval application dated August 29, 2025 signed by Tony DiFruscio, Manager, Nova Core Communities, including supporting information.

2. E-mail dated September 17, 2026 from Jon Astley, Downing Street Brownfield Partners, to Craig Fowler, Lead Engineer, Waste, Ministry of the Environment, Conservation and Parks, providing updated Site Plan and review of ECA conditions.

Schedule "B"

This Schedule "B" forms part of this Approval.

Groundwater Monitoring

Location	Parameters	Frequency
MW1, MW2, and MW3	hardness, pH, total and dissolved metals field measurements: pH, conductivity, temperature, turbidity	annually (fall)

Surface Water Monitoring

Location	Parameter	Frequency
SW1, SW2, and SW3	hardness, pH, total suspended solids, total and dissolved metals, dissolved organic carbon field measurements: temperature, pH, conductivity, dissolved oxygen, visual assessment of channel flow (e.g. dry, stagnate, flowing)	4x per year (spring, summer, fall, and winter) 2 of the 4 sampling events are to follow a significant rain event of more than 15 mm within a 24-hour period

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

1. The reason for Conditions 1.0, 3.0, 4.0, 5.0 and 9.0 is to clarify the legal rights and responsibilities of the Owner and the Operator.
2. The reason for Condition 2.0 and 20.0 is to ensure that the Site is operated in accordance with the application and supporting documentation submitted by the Owner, and not in a manner which the Director has not been asked to consider.
3. The reasons for Condition 6.0 are to ensure that the Site is operated under the corporate name which appears on the application form submitted for this approval and to ensure that the Director is informed of any changes, and to restrict potential transfer or encumbrance of the Site without the approval of the Director and to ensure that any transfer of encumbrance can be made only on the basis that it will not endanger

compliance with this Approval.

4. The reason for Condition 7.0 is to ensure that sufficient funds are available to the Ministry to clean up the Site in the event that the Owner is unable or unwilling to do so.
5. The reason for Condition 8.0 is to ensure that appropriate Ministry staff have ready access to the Site for inspection of facilities, equipment, practices and operations required by the conditions in this Approval. This condition is supplementary to the powers of entry afforded to a Provincial Officer pursuant to the EPA, OWRA and PA.
6. The reasons for Condition 10.0, 12.0, 13.0 and 14.0 are to specify the service area, hours of operation, the types of waste that may be received at the Site, the maximum amount of waste that may be received and stored at the Site, the manner in which waste may be stored at the Site and the waste activities that may be carried out at the Site.
7. The reason for Condition 11.0 is to ensure that users of the Site are fully aware of important information and restrictions related to Site operations, access and emergency response under this Approval, and to ensure the controlled access and integrity of the Site by preventing unauthorized access when the Site is closed and no site attendant is on duty.
8. The reason for Condition 15.0 is to ensure that all wastes are properly classified to ensure that they are managed, processed and disposed in accordance with Regulation 347 and in a manner that protects the health and safety of people and the public.
9. The reason for Conditions 16.0 and 18.0 is to ensure that the Site is operated and maintained in an environmentally acceptable manner, which does not result in a hazard or nuisance to the natural environment or any person.
10. The reasons for Condition 17.0, 19.0 and 21.0 are to ensure that the Site is not the cause of any nuisance impacts or Adverse Effects and to ensure that the Site is inspected on a regular basis to maintain this status.
11. The reason for Condition 22.0 is to ensure that all complaints received are recorded and addressed in a timely manner.
12. The reason for Condition 23.0 is to ensure that all spills and emergencies are properly addressed in a timely manner.
13. The reason for Condition 24.0 is to ensure that the Site is operated by properly trained staff so that the operation of the Site does not result in a hazard or nuisance to people or the environment.
14. The reason for Condition 25.0 is to require the Owner to undertake the monitoring activities, ensure the integrity of the groundwater monitoring network, there is a plan with an organized set of procedures for identifying and responding to potential issues relating to groundwater and surface water contamination at the Site's compliance point and to outline the process for making changes to the monitoring plan and amending the Approval.
15. The reason for Condition 26.0 is to provide for the proper assessment of effectiveness and efficiency of site design and operation, their effect or relationship to any nuisance or environmental impacts, and the occurrence of any public complaints or concerns. Record keeping is necessary to determine compliance with this Approval, the EPA and its regulations.
16. The reason for Condition 27.0 is to ensure that the Site is closed in accordance with Ministry standards in a

manner that protects the health and safety of the public and the environment.

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
40 St. Clair Avenue West, 2nd Floor
Toronto, Ontario
M4V 1M2

*** 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 30th day of September, 2026

Mohsen Keyvani, P.Eng.
Director
appointed for the purposes of Part II.1 of the
Environmental Protection Act

CF/
c: District Manager, MECP Niagara
Tony DiFruscio, DSLR Inc.