ENVIRONMENTAL COMPLIANCE APPROVAL
NUMBER 0955-DXYPUK
Issue Date: October 30, 2026

CHAR Bioveld Thorold LP,
by its General Partner CHAR Tech Thorold GP Inc.
3363 Davis Rd
Thorold, Ontario
L2V 3Z5

Site Location: Biocarbon & RNG Facility
3363 Davis Rd
Thorold, Ontario
L2V 3Z5

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 0.65-hectare waste disposal site (waste processing and transfer site), to receive and process a maximum of 240 tonnes per day / 70,000 tonnes per year of woodwaste to produce biocarbon and renewable natural gas.

Processing of the following types of waste generated in the Province of Ontario:

- solid, non-hazardous waste consisting of clean woodwaste.

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:

"Adverse Effect" has the same meaning as defined in the EPA;

"Approval" means this entire Environmental Compliance Approval and any Schedules attached to it;

"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;

"District Manager" means the District Manager of the appropriate local district office of the Ministry,

where the Site is geographically located;

"ECA" means an Environmental Compliance Approval as defined under Section 27 of the EPA;

"EPA" means the Environmental Protection Act, R.S.O. 1990, c. E. 19;

"Equipment" means the equipment, works or processes described in the Owner's application, this Approval and in the Supporting Documentation, to the extent approved by this Approval;

"Equivalent Equipment" means a substituted equipment or like-for-like equipment that meets the required quality and performance standards of a-named equipment;

"Facility" means the entire operation located on the property where the Equipment is located;

"Ministry" means the ministry of the government of Ontario responsible for the EPA and OWRA and includes all officials, employees or other persons acting on its behalf;

"NMA" means the Nutrient Management Act, 2002, S.O. 2002, c. 4;

"O. Reg. 347" means R.R.O. 1990, O. Reg. 347: (General - Waste Management), made under the EPA;

"Owner" means any person that is responsible for the establishment or operation of the Site being approved by this Approval, and includes CHAR Bioveld Thorold LP, by its General Partner CHAR Tech Thorold GP Inc. and its successors and assigns;

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

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

"Professional Engineer" means a Professional Engineer as defined within the Professional Engineers Act, R.S.O. 1990, c. P.28, as amended;

"Provincial Officer" means any person designated in writing by the Minister as a provincial officer pursuant to Section 5 of the OWRA, Section 5 of the EPA, Section 17 of the PA, Section 4 of the NMA,or Section 8 of the SDWA;

"Rejected Waste" means the waste which is not approved for receipt at the Site;

"Residual Waste" means the waste resulting from the processing of the incoming woodwaste at the Site and which requires final disposal or further processing off-Site;

"Schedules" means the following schedules attached to this Approval and forming part of this Approval namely:

a. Schedule A - Supporting Documentation;

"SDWA" means the Safe Drinking Water Act, 2002, S.O. 2002, c. 32;

"Site" means the waste disposal site approved under this Approval, located at 3363 Davis Road, Thorold, Ontario, L2V 3Z5;

"Spill" is as defined in the EPA;

"Tonnes" means the actual mass of the material including its water content, equivalent to the term wet tonnes;

"t/day" and "t/year" means tonnes per day, and tonnes per year, respectively;

"Trained Personnel" means personnel knowledgeable in the following through instruction and/or practice:

- relevant wastewater and waste management legislation, regulations and guidelines;
- major environmental concerns pertaining to the waste to be handled at the Site;
- occupational health and safety concerns pertaining to the processes and wastes to be handled at the Site;
- management procedures including the use and operation of equipment for the processes and wastes to be handled at the Site;
- records keeping procedures;
- contingency plan and emergency response procedures;
- specific written procedures for the control of adverse effects from the Site;
- specific written procedures for refusal of unacceptable incoming waste loads; and
- 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 GENERAL

1.1 Compliance

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

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

1.2 Build, etc. in Accordance

(1) Except as otherwise provided by this Approval, the Site shall be designed, developed, built, operated and maintained in accordance with the application for this Environmental Compliance Approval dated February 2, 2026, signed by Andrew White, Managing Partner, CHAR Bioveld Thorold LP, by its General Partner CHAR Tech Thorold GP Inc..

(2) The Site shall be constructed and installed and must commence operation within five (5) years of issuance of this Approval, 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) Within thirty (30) days of the following, the Owner shall submit the corresponding to the District Manager:

a. At commencement of construction, the Owner shall prepare and submit to the District Manager a schedule for the completion of construction and commissioning operation of the Site;
b. Upon completion of construction of the Site, the Owner shall prepare and submit to the District Manager a statement, that is certified by a Professional Engineer, that the Site was constructed in accordance with this Approval; and
c. At commissioning operation of the Site, the Owner shall provide notification to the District Manager.

1.3 As-built Drawings

(1) A set of as-built drawings, certified by a Professional Engineer and showing the design of the Site, shall be kept at the Site at all times.

1.4 Interpretation

(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.

(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) 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.

(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.

1.5 Other Legal Obligations

(1) The issuance of, and compliance with the conditions of 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; or
b. limit in any way the authority of the Ministry to require certain steps be taken or to require the Owner to furnish any further information related to compliance with this Approval.

(2) Despite an Owner or any other person fulfilling any obligations imposed by this Approval, the 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 or impairment of water quality.

1.6 Adverse Effect

(1) The Site shall be constructed, operated and maintained in a manner which ensures the health and safety of all persons and prevents generation of negative environmental impacts including but not limited to dust, odours, vectors, pests, birds, litter, vibration, noise and any other negative environmental effects that may cause an Adverse Effect.

(2) If at any time dust, including dust from vehicles leaving the Site, odours, vectors, pests, birds, litter, vibration, noise or other such negative environmental effects are generated at the Site and cause an Adverse Effect, the Owner shall take immediate and appropriate remedial action(s) that is/are necessary to alleviate the Adverse Effect, including suspension of all waste management activities and removal of waste from the Site, if necessary.

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

1.7 Change of Owner

(1) The Owner 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 change in:

a. the ownership of the Site;
b. the operator of the Site;
c. the address of the Owner;
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, as amended, shall be included in the notification; or
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, as amended, shall be included in the notification.

(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. In the event of any change in ownership of the Site, other than change to a successor municipality, the Owner shall notify the successor of and provide the successor with a copy of this Approval, and the Owner shall provide a copy of the notification to the District Manager and the Director.

1.8 Inspections by the Ministry

(1) No person shall hinder or obstruct a Provincial Officer from carrying out any and all inspections authorized by the OWRA, the EPA, the PA, the SDWA or the NMA of any place to which this Approval relates, and without limiting the foregoing:

a. to enter upon the premises where the approved processing is undertaken, 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;
e. to conduct interviews with staff, contractors, agents and assignees of the Owner; and
f. to sample and monitor for the purposes of assessing compliance with the terms and conditions of this Approval or the EPA, the OWRA, the PA, the SDWA or the NMA.

1.9 Information and Record Retention

(1) Any information requested by the Ministry, concerning the operation of the Site and its operation under this Approval, including but not limited to any records required to be kept by this Approval shall, upon request, be provided to the Ministry in a timely manner and in a format specified by the Ministry. All records shall be retained for five (5) years except as otherwise authorized in writing by the Director.

(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.

(3) The Owner shall ensure that a copy of this Approval, in its entirety and including all its Notices of Amendment, and the documentation listed in Schedule "A", are retained on Site at all times.

1.10 Financial Assurance

(1) Within sixty days (60) of issuance of this Approval, the Owner shall submit to the Director, Financial Assurance as defined in Section 131 of the EPA, for the amount of $81,577.00. This Financial

Assurance shall be in a form acceptable to the Director and shall provide sufficient funds for the analysis, transportation, Site clean-up, monitoring and disposal of all quantities of waste on the Site at any one time.

(2) Commencing on October 31, 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 1.10 (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 ten (10) days of written acceptance of the re-evaluation by the Director.

(3) The amount of Financial Assurance is subject to review at any time by the Director and may be amended at his/her discretion. 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) days before the Financial Assurance terminates, the Financial Assurance shall forthwith be replaced by cash.

2.0 SIGNS AND SITE SECURITY

2.1 Signs

(1) The Owner shall ensure that a sign is posted at the entrance to the Site, readable from the nearest public roadway bordering the Site. The following information shall be included on the sign:

a. name of the Owner;
b. this Approval number;
c. normal hours of operation;
d. Owner's telephone number to which complaints may be directed;
e. Ministry's telephone numbers to which complaints may be directed;
f. Owner's twenty-four hour emergency telephone number (if different from above);
g. a warning against unauthorized access; and
h. a warning against dumping at the Site.

2.2 Site Security

(1) The Owner shall ensure that all waste processing, loading, unloading and transfer to or from vehicles or containers at the Site are supervised at all times by Trained Personnel.

(2) The Owner shall ensure the Site is operated in a safe and secure manner, and that all waste is properly handled, contained or stored so as not to pose any threat to the general public and the Site personnel.

(3) The Owner shall ensure that access to the Site is regulated and that the Site is secured to restrict access only to authorized personnel.

(4) The Owner shall ensure that all Site entrances and buildings are gated and locked to restrict access only

to authorized personnel when the Site is not open.

3.0 SERVICE AREA, APPROVED WASTE TYPE AND RATES

3.1 Approved Waste Type

(1) The Owner may only accept non-hazardous, woodwaste sourced from an Ontario woodwaste supplier with a valid ECA that has been pre-processed to a size of no greater than 3 inches wide and 6 inches long and screened by the supplier to contain less than 1% debris (i.e., plastic, aggregate residue, drywall, etc.).

(2) The Owner shall ensure that the received woodwaste is not treated with chemicals, paint, stain or other coatings, and is free of glue.

3.2 Service Area

(1) The Site may only receive waste that is generated within Ontario.

3.3 Waste Receipt Rates

(1) The Owner is approved to receive woodwaste with the maximum quantities of 240 tonnes per day (t/d) and 70,000 tonnes per year (t/yr).

4.0. SITE OPERATIONS

4.1 Operating Hours

(1) The Owner is approved to undertake waste management activities at the Site twenty-four (24) hours per day, seven (7) days per week.

4.2 Incoming Waste Receipt

(1) The Owner shall ensure that all incoming waste is inspected and ensure that only waste that is approved under this Approval is received at the Site.

4.3 Rejected Waste Handling

(1) The Owner shall not receive any incoming waste that is not approved under this Approval and this rejected waste shall be refused at the Site. A record shall be made in the daily log book or in an electronic file of the reason why the waste was refused, the origin of the waste, and the ECA/EASR number of the hauler transporting the rejected waste.

(2) District Manager shall be notified in writing of the receipt of unacceptable loads within three (3) business days.

(3) The following information shall be included in the notification to the District Manager:

a. quantity and type of waste refused;
b. source of the waste;
c. final destination of the rejected waste, if known;
d. the ECA/EASR number of the hauler transporting the rejected waste; and
e. time and date of receipt and time and date of removal from the Site.

4.4 Storage

(1) The Owner is approved to store a maximum amount of waste at the Site, as follows:

a. No more than 450 tonnes of woodwaste shall be stored at the Site, within:
   i. two double stack storage bins with a total storage capacity of 580 m^3; and
   ii. two covered outdoor storage areas with a total storage capacity of 1,478 m^3. The outdoor storage areas shall be paved, covered and will include a berm to ensure no runoff into nearby surface water bodies and infiltration into the subsurface.

b. No more than 75 m^3 of biocarbon that shall be stored within a silo.

c. No more than 50 m^3 of oil and tar waste recovered from the Dissolved Air Flotation (DAF) unit. The oil and tar waste shall be stored in up to Intermediate Bulk Container (IBC) tanks.

d. No more than 7,500 m^3 of wastewater containing grease that will be collected within the grease interceptor.

e. No more that 90 m^3 of residual waste, which consists of 30 m^3 of waste fines, rejected wood chips and dust; 30 m^3 of stones, and 30 m^3 of metal.

(2) The Owner shall ensure that sufficient storage capacity is available, as approved in this Approval, prior to unloading of the woodwaste from its transport vehicles.

(3) Solid putrescible waste generated through activities not relating to the handling and processing of the woodwaste (i.e., office, lunch room, etc.) shall be handled in a manner that does not create an adverse effect and in accordance with the requirements of O. Reg. 347.

(4) Other than the covered outdoor storage areas and double stack storage bins, no outside waste storage is approved under this Approval.

4.5 Approved Processing

(1) The following waste management/processing activities are approved under this Approval:

a. Wet woodwaste may be loaded into an indirect natural gas-fired belt dryer system to reduce the moisture content to 15%.

b. Preprocessing of woodwaste through:
   i. magnetic separator to remove metal contaminants;
   ii. a roller screen to remove fines and oversize wood chips;
   iii. gravimetric separation to remove heavy materials such as stones; and

iv. size deduced via a hammermill and discharged to the metering bins.

c. Residual waste will be deposited into storage bins at each stage of the preprocessing.

d. A dust collector will be used to capture dust generated during the separation preprocessing.

e. Isolating rotary valve acts as an airlock sealing system that feeds the preprocessed woodwaste into pyrolysis kiln.

f. Pyrolysis kiln provides indirect heat between 750°C and 800°C in a non-oxygenated atmosphere for the woodwaste to undergo chemical transformation to produce a biocarbon and pyrogas.

g. Solid biocarbon material is then discharged via the outlet conveyor and the pyrogas exits through the top of the chamber.

h. Biocarbon is cooled and discharged via an airlock system.

i. The biocarbon passed through a grinder, mixed with a binder and process water to produce pellets within a pelletmill/extruder, and dried on a belt dryer.

j. The biocarbon pellets are conveyed into a silo to be stored until transferred off-site.

k. Any fine particles from producing the pellets are removed.

l. Pyrogas will be treated in the Pyrogas Treatment System (PTS) to produce syngas, which is further treated in the Gas Upgrading System (GUS) to be upgraded to renewable natural gas (RNG).

m. RNG will be uploaded directly to the Enbridge/Energir pipeline.

n. Use of emergency thermal oxidizer, during start up and in the event of an emergency or systems failure. The air emissions from the thermal oxidizer are authorized through a separate air emissions ECA.

4.6 Pyrolysis System

(1) Two kilns are a part of the total pyrolysis system. Each kiln will have its own biocarbon pelletmill/extruder system, with one thermal oxidizer serving both kilns.

(2) Kiln 1 may process woodwaste at a rate of up to 2.5 tonnes per hour, which corresponds to a daily feed rate of approximately 60 tonnes.

(3) Kiln 2 may process woodwaste at a rate of up to 3.85 tonnes per hour, which corresponds to a daily feed rate of approximately 92 tonnes.

(4) Pyrogas produced in each kiln will be combined and treated in the PTS to produce syngas.

4.7 Pyrogas Treatment System

(1) The PTS is a four-stage process that provides cooling, water-spray scrubbing, polishing, and dehumidification. This treatment removes moisture, dust, oil, tar, hydrogen sulfide, ammonia, and any remaining undesired materials from the pyrogas to convert it into syngas.

(2) The PTS will be maintained under suction and deliver the gas at a constant pressure and a temperature of 40°C.

4.8 Gas Upgrading System

(1) Syngas shall be directed to the GUS to be upgraded to RNG as follows:

a. compressed to up to 17 bar gauge (barg) using a compressor;
b. mixed with steam from an electric heater in a high temperature Water Gas Shift (WGS) reactor to generate the hydrogen gas;
c. cooled down to approximately 400°C;
d. passed through a series of catalytic reactors, the first being two zinc oxide catalytic bed reactors for the removal of any remaining hydrogen sulfide;
e. through a pre-reformer reactor for hydrocarbon cracking and the partial methanation of the hydrogen gas;
f. a high temperature shift reactor will be used to adjust the carbon monoxide concentration in order to achieve the 3:1 ratio of hydrogen gas to carbon monoxide required for methanation;
g. enter three in-series methanators through which the hydrogen and carbon monoxide gases will be methanated by being catalyzed by an aluminium oxide supported nickel catalyst;
h. moisture will be condensed and removed from the stream inside a cold separator unit, by cooling the gas mixture to 90°C;
i. decompressed to 20 barg through a turbo expander;
j. pass through a series of columns for a pressure swing adsorption process which removes gases such as carbon monoxide and carbon dioxide; and
k. final compression of the produced Renewable Natural Gas to pipeline pressure.

(2) The Owner shall maintain the Thermal Oxidizer as a fully functional stand-by system, so that in the instance of a process upset and/or when the GUS is inoperable or producing Renewable Natural Gas that is out of compliance with the required quality criteria, the Thermal Oxidizer may be utilized to destroy the syngas/RNG.

(3) Any condensate from the treating of the syngas shall be treated as wastewater.

(4) The pyrogas, syngas and the RNG production rate and quality shall be monitored and/or tested in accordance with the proposal set out in the supporting documentation listed in the attached Schedule "A" as required by the natural gas distribution infrastructure owner.

4.9 Biocarbon Handling

(1) The biocarbon pellets generated by the pyrolysis system shall be stored in the silo located outside.

(2) The Owner shall remove the biocarbon pellets from the Site when the silo is full.

(3) The Owner shall ensure that the biocarbon pellets are disposed of at a site for which either an ECA has been issued by the Ministry or will be utilized as a fuel, and either site are approved to receive this type

and quantity of waste.

4.10 Residual Waste Handling

(1) All solid Residual Waste removed from the Site for final disposal shall only be disposed of at a site for which an ECA has been issued by the Ministry and the site is approved to receive this type and quantity of waste.

(2) The Residual Waste shall be stored in three (3) storage bins located outside.

(3) The Owner shall remove the Residual Waste from the Site when the storage bins are full.

(4) The Owner shall ensure that the Residual Waste is covered when removed from the Site and during transport to its final disposal site.

4.11 Wastewater Handling

(1) The Owner shall treat all effluent from the waste processing at the Site prior to discharge to the Bioveld Industrial Hub wastewater system, which then discharges to the City of Thorold's municipal sanitary sewer, as proposed in the supporting documentation listed in the attached Schedule "A".

(2) The Wastewater Treatment shall consist of a three-stage grease separator with pH adjustment.

(3) The Owner shall ensure that the treated effluent meets the City of Thorold's Sewer Use Bylaw prior to discharging into sanitary sewer.

(4) The Owner shall follow any requirements imposed by the City of Thorold regarding the discharge to their municipal sanitary sewer.

5.0 SITE INSPECTIONS AND MAINTENANCE

5.1 Daily Inspections and Inspection Log

(1) A visual inspection of the entire Site and all equipment on the Site shall be conducted each day the Site is open to ensure that:
- (a) the Site is secure;
- (b) the operation of the Site is not causing any nuisances;
- (c) the operation of the Site is not causing any adverse effects on the environment; and
- (d) the Site is being operated in compliance with this Approval.

(2) Any deficiencies discovered as a result of the inspection shall be remedied immediately, including temporarily ceasing operations at the Site if needed**.**

(3) An electronic or written record of the inspections shall be maintained and shall include the following:
- (a) the name and signature of person that conducted the inspection;
- (b) the date and time of the inspection;
- (c) the list of all deficiencies discovered during the inspections;

(d) the recommendations for remedial action to address the identified deficiencies; and
(e) the date, time and description of the remedial actions taken.

5.2 Maintenance

(1) The Owner ensure that the maintenance program for all on-Site equipment associated with the processing and managing of wastes is followed as described in the Design and Operations Report, Item 2 of Schedule "A" of this Approval.

6.0 NUISANCE IMPACT CONTROL AND HOUSEKEEPING

6.1 Trucks and Traffic

(1) The Owner shall ensure that there is no queuing or parking of vehicles that are waiting to enter the Site on any roadway that is not a distinct part of the Site.

(2) All waste must be transported to and from the Site in accordance with the EPA and O. Reg. 347 and in vehicles that have been approved by the Ministry or registered on the EASR, as required.

6.2 Litter

(1) The Owner shall prevent the escape of litter from the Site and pick up litter around the Site on a daily basis, or more frequently if necessary.

6.3 Vectors and Vermin

(1) The Owner shall:

a. implement necessary housekeeping procedures to eliminate sources of attraction for vermin and vectors; and
b. if necessary, hire a qualified, licensed pest control professional to design and implement a pest control plan for the Site.

6.4 Fugitive Emissions to the Atmosphere

(1) The Owner shall ensure that all on-site roads and operations/yard areas are regularly swept/wetted to prevent dust impacts off-Site.

(2) The Owner shall maintain and operate a dust collection system at the Site to minimize any dust emissions from the processing of waste.

7.0 LIMITED OPERATIONAL FLEXIBILITY

(1) The Owner may make modifications to the Site and the Design and Operations Report in accordance with the terms of this condition and the pre-approved limits of the operating envelope as described in the

Design and Operations Report contained within Item 2 of Schedule "A".

(2) For greater certainty, the following modifications to the Site are permitted as part of the operating envelope:

a. the ability to make modifications to the Site's equipment including:
   i. Additional equipment for handing of waste materials or minor equipment modifications (replacement in kind).
   ii. The type and number of pieces of equipment may vary depending on business needs.
   iii. Where required, the equipment inspection and maintenance program shall be updated accordingly.
   iv. This LOF excludes equipment associated with the thermal treatment/RNG process.
b. the ability to make modifications to the Site's residual waste storage bins including:
   i. the residual waste storage bins may be relocated to any portion of the site that is outside and is fully paved;
   ii. the size and number of waste bins may vary depending on operational efficiencies; and
   iii. the total maximum volume of residual waste may not be exceeded.
c. the ability to make modifications to the Site's infrastructure including:
   a. Environmentally insignificant changes to the structural elements of the Site, including buildings, roads, gates, and likewise.
   b. Modifications to the building layout, access points, parking, and likewise to allow for operational efficiency.
   c. Addition of small outbuildings (sheds) to store equipment or general operational materials, but not waste.

(3) The Owner shall provide a written notification to the District Manager and Director at least fifteen (15) days prior to making modifications to the Site in accordance with Condition 7.1. At a minimum the notification shall include the following:

a. a description of the change to the operations of the Site including an assessment of the anticipated environmental effects of the modifications;
b. updated versions of, or amendments to, all relevant technical documents required by this Approval that are affected by the modification including but not necessarily limited to an updated Site Plan drawing, Design and Operations Report and the Emergency Response Plan (ERP) including a record that tracks all changes that were made to the documents; and
c. a statement signed by the Owner and an Professional Engineer declaring that the modifications made to the Site are done so in accordance with the operating envelope, are consistent with industry's best management practices and are not likely to result in an adverse effect.

(4) Notwithstanding Condition 7.3, if the modifications made to the Site require an amendment to the Site's Fire Prevention and Response, within the ERP, the Owner shall obtain the authorization of the local fire services authority prior to instituting the modifications. Confirmation of the local fire services' approval for the proposed modifications must be forwarded to the District Manager.

8.0 COMPLAINT RESPONSE PROCEDURE

(1) If at any time, the Owner receives any environmental complaints from the public regarding the operation

of the Site, the Owner shall respond to these complaints according to the following procedures:

a. Step 1: Receipt of Complaint - The Owner shall record each complaint. The information recorded shall include the following:
   i. the name, address and the telephone number (or contact information) of the complainant, if known;
   ii. the date and time of the complaint; and
   iii. details of the complaint, including the description and duration of the incident.

b. Step 2: Investigation of Complaint - After the complaint has been received by the Owner and recorded, the Owner shall, immediately notify, either the District Manager by phone during office hours or the Ministry's Spills Action Centre at 1-800-268-6060 after office hours. The Owner shall immediately initiate investigation of the complaint. The investigation shall include, as a minimum, the following:
   i. determination of the activities undertaken in the Site at the time of the complaint;
   ii. general meteorological conditions including, but not limited to the ambient temperature, approximate wind speed and its direction, sunny versus cloudy, inversion versus clear and windy, etc. at the time of the complaint;
   iii. location of the person who submitted the complaint, if known, at the time of the incident; and
   iv. determination if the complaint is attributed to activities being undertaken at the Site and if so, determination of all the possible cause(s) of the complaint;

c. Step 3: Corrective Action - The Owner shall determine the remedial action(s) to address the cause(s) of the complaint and implement the remedial action(s) to eliminate the cause(s) of the complaint, as soon as practicably possible, and to prevent a similar occurrence in the future;

d. Step 4: Written Response - The Owner shall forward a formal reply to the complainant, if known and to the District Manager within one (1) week after the receipt of the complaint. The response shall include the results of the investigation of the complaint, the action(s) taken or planned to be taken to address the cause(s) of the complaint, and if follow-up response would be provided.

e. Step 5: Recording - All of the information collected and actions taken must be recorded.

(3) If the District Manager deems the remedial measures taken as per Condition 8.0(1)c. to be unsuitable, insufficient or ineffective, the District Manager may direct the Owner, in writing, pursuant to the remedial order section (s.17) or the preventative measures order section (s.18) of the EPA to take further measures to address the noted failure, upset or malfunction, including but not limited to the following:
   a. reduction in the receipt of waste;
   b. cessation of the receipt of the waste;
   c. removal and off-site disposal of waste;
   d. repairs or modifications to the Equipment or processes at the Site; and
   e. further investigation of possible sources of fugitive air emissions from the Site.

9.0 TRAINING

(1) All operators of the Site shall be trained with respect to the following:
   a. relevant air, noise, wastewater and waste management legislation, regulations and guidelines;

b. major environmental concerns pertaining to the waste to be handled at the Site;
c. occupational health and safety concerns pertaining to the processes and wastes to be handled at the Site;
d. management procedures including the use and operation of equipment for the processes and wastes to be handled at the Site;
e. records keeping procedures;
f. contingency plan and emergency response procedures;
g. specific written procedures for the control of adverse effects from the Site;
h. specific written procedures for refusal of unacceptable incoming waste loads; and
i. the requirements of this Approval.

(2) The training of the operators of the Site shall also include the procedures contained in the Design and Operations Report.

(3) The training of the operators of the Site shall be undertaken:
a. upon commencing employment at the Site;
b. whenever procedures are updated.

10.0 EMERGENCY MEASURES AND CONTINGENCY PLAN

(1) Prior to any processing of the waste at the Site, the Owner shall prepare and finalize a Emergency Response Plan (ERP). The ERP shall be prepared in consultation with the District Manager, the local Municipality and the Fire Department and shall include, as a minimum, the following information:

a. emergency response procedures to be undertaken in the event of a spill, process upset, power failure, fire, explosion or any other emergency situation, including specific clean-up methods for wastes expected to be generated from the emergency situation;

b. procedures to prevent environmental emergencies at the Site;

c. a list of equipment and clean up materials available for dealing with the emergency situations, including the location of these;

d. 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 Fire Department, the local Municipality, the local Medical Officer of Health, and the Ministry of Labour, and the names and telephone numbers of environmental clean-up companies available for emergency response;

e. description of roles and responsibilities;

f. appropriate training and awareness; and

g. a Site diagram showing all storage areas and areas where equipment operates.

(2) Prior to any processing of the waste at the Site, approval of the ERP shall be obtained from the Fire Department and submitted to the District Manager and the local Municipality.

(3) An up-to-date version of the ERP shall be kept at the Site at all times, in a central location available to

all staff, and a copy shall be submitted to the District Manager, the local Municipality and the Fire Department, if requested.

(4) The ERP shall be reviewed on an annual basis and updated, if necessary. The revised version of the ERP shall be submitted to the District Manager, the local Municipality and the Fire Department for comments and concurrence.

11.0 EMERGENCY SITUATIONS RESPONSE AND REPORTING

(1) The Owner shall immediately take all necessary measures, as outlined in the ERP, to handle the emergency situations occurring at the Site.

(2) The Owner shall ensure that the equipment and materials outlined in the ERP are immediately available at the Site at all times and are in a good state of repair and fully operational.

(3) The Owner shall ensure that all Site personnel are fully trained in the use of the equipment and materials outlined in the ERP, and in the procedures to be employed in the event of an emergency.

(4) All Spills shall be immediately reported to the **Ministry's Spills Action Centre at 1-800-268-6060** and shall be recorded in the log book as to the nature and cause of the Spill, and the action taken for clean-up, correction and prevention of similar future occurrences.

(5) 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 three (3) calendar days outlining the nature of the Spill, remedial measure taken and the measures taken to prevent future occurrences at the Site.

12.0 RECORDS KEEPING AND RETENTION

12.1 Daily Activities

(1) The Owner shall maintain an on-site written or digital record of 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. quantity and type of the waste received at the Site;
c. quantity and type of waste processed at the Site;
d. quantity and type of waste present at the Site;
e. amount of biocarbon pellets shipped from the Site and its destination;
f. quantity of the Residual Waste shipped for final disposal, the name of the receiving site and its Environmental Compliance Approval number;
g. quantity and type of any Rejected Waste rejected from the Site;
h. housekeeping activities, including litter collection, washing/cleaning activities, etc.
i. date and the quantity of Renewable Natural Gas transferred from the Site to the natural gas distribution infrastructure;

j. amount of syngas/Renewable Natural Gas being destroyed by the Thermal Oxidizer.

(2) The Owner shall retain all records pertaining to Condition 12.1(1) for a minimum of five (5) years.

12.2 Emergency Situations

(1) The Owner shall maintain an on-Site written or digital record of the emergency situations. The record shall include, as a minimum, the following:

a. the type of an 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.

12.3 Inspections

(1) 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 person that conducted the inspection (if a digital record is made then a physical signature is not required);
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.

12.4 Training

(1) 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 (if a digital record is made then a physical signature is not required); and
c. description of the training provided.

12.5 Complaints Response Records

(1) The Owner shall establish and maintain a written or digital record of complaints received and the responses made as required by this Approval.

12.6 Annual Report

(1) By March 31st following the end of each operating year, the Owner shall prepare and submit to the District Manager 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 signed statement that the Site was in compliance with the Approval;
b. a monthly summary of the quantity of all incoming waste;
c. an annual waste receipt rate of waste as approved in Condition 3.3(1);
d. a monthly summary of the quantity of the outgoing biocarbon pellets, Residual Waste and Rejected Waste shipped from the Site and its destination;
e. annual amount of Renewable Natural Gas transferred from the Site to the natural gas distribution infrastructure;
f. annual amount of gas being destroyed using the thermal oxidizer ;
g. 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;
h. any recommendations to minimize environmental impacts from the operation of the Site and to improve Site operation and monitoring programs in this regard;
i. a summary of any complaints received and the responses made;
j. a summary of any emergency situations that have occurred at the Site and how they were handled;
k. a summary of all inspections and maintenance carried out at the Site; and
l. any other information the District Manager requires from time to time.

12.7 Design and Operations Report

(1) The Company shall maintain an up-to-date Design and Operations Report for the Site, which shall contain at a minimum the information required by the Ministry's "Guide to applying for an Environmental Compliance Approval" as it applies to the Site.

(2) The Design and Operations Report shall be:

a. kept up-to-date at all times so that it accurately reflects the ongoing Site activities as approved under this Approval;
b. retained at the Site;
c. available for inspection by a Provincial Officer upon request; and
d. updated and submitted with all future Environmental Compliance Approval applications for the Site, including a revisions tracking log.

(3) Changes to the Site's operations Design and Operations Report that do not require an amendment to this Approval under Section 27 of the EPA shall be recorded in a revisions tracking log in the Design and Operations Report and submitted to the District Manager for record keeping.

13.0 <u>CLOSURE</u>

(1) The Owner shall submit, for approval by the Director, a written Closure Plan nine (9) months prior to the permanent closure of the Site. This plan must include, as 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.

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

Schedule "A"

This Schedule "A" forms part of this Environmental Compliance Approval

1. Environmental Compliance Approval Application, with supporting documents, signed by Andrew White, Managing Partner, CHAR Bioveld Thorold LP, by its General Partner CHAR Tech Thorold GP Inc., dated February 2, 2026.
2. Design & Operations Report (Revised), Thermal Treatment Facility, Thorold, Ontario. Pinchin Ltd. January 12, 2026.

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

Conditions 1.1, 1.4, 1.5, 1.6 and 1.9 are included to clarify the legal rights and responsibilities of the Owner.

Conditions 1.2 and 1.3 are included to ensure that the Site is build and 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.

Condition 1.7(1) is included 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.

Condition 1.7(2) is included 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.

Condition 1.8 is included to ensure that the appropriate Ministry staff has ready access to the operations of the Site which are approved under this Approval. The Condition is supplementary to the powers of entry afforded a Provincial Officer pursuant to the EPA, the OWRA, the PA, the NMA and the SDWA.

Condition 1.10 is to ensure sufficient funds are available to provide for the clean-up of the Site in the event the Owner is unwilling or unable to clean up the Site.

SIGNS AND SITE SECURITY

Condition 2.0 is included to ensure that the Site's users, operators and the public are fully aware of important information and restrictions related to the operation of the Site. Condition 2.0 is also included to ensure that the Site is sufficiently secured, supervised and operated by properly Trained Personnel and to ensure controlled access and integrity of the Site by preventing unauthorized access when the Site is closed and no Site personnel is on duty.

SERVICE AREA, APPROVED WASTE TYPES AND RATES

Condition 3.0 is included to specify the approved waste receipt rate, the approved waste types and the service area from which the waste may be accepted at the Site based on the Owner's application and supporting documentation.

SITE OPERATIONS

Conditions 4.1 is included to specify the hours of operation for the Site to ensure that the hours of Site's operation are the same as those considered by the Director.

Condition 4.2 is included to ensure that only the approved the waste type are accepted and handled/processed at the Site.

Conditions 4.3 through 4.11 are included to ensure that waste, storage and management are undertaken in a way which does not result in an Adverse Effect or a hazard to the environment or any person and are 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.

Condition 4.4 is also included to identify the amounts of waste approved to be present at the Site at any one time.

SITE INSPECTIONS AND MAINTENANCE

Condition 5.0 is included to require the Site, including the equipment used for waste management and gas upgrading operations at the Site, to be inspected and the equipment be maintained thoroughly and on a regular basis to ensure that the operations at the Site are undertaken in a manner which does not result in an Adverse Effect or a hazard to the health and safety of the environment or any person.

NUISANCE IMPACT CONTROL AND HOUSE KEEPING

Condition 6.0 is included to ensure that the Site is operated and maintained in an environmentally acceptable manner which does not result in a negative impact on the natural environment or any person.

LIMITED OPERATIONAL FLEXIBILITY

Condition 7.0 is included to allow flexibility with the operation of the Site and the Design and Operations Report within pre-approved limits while ensuring safety of the natural environment or any person.

COMPLAINTS RESPONSE PROCEDURE

Condition 8.0 is included to require the Owner to respond to any environmental complaints resulting from the operations at the Site appropriately and in a timely manner and that appropriate actions are taken to prevent any further incidents that may cause complaints in the future.

TRAINING

Condition 9.0 is included to ensure that personnel employed at the Site are fully aware and properly trained on the requirements and restrictions related to Site operations under this Approval.

EMERGENCY MEASURES AND CONTINGENCY PLAN

Condition 10.0 is included to ensure that the Owner is prepared and properly equipped to take action in the event of an emergency situation.

EMERGENCY SITUATIONS RESPONSE AND REPORTING

Condition 11.0 is included to require further spill notification to the Ministry, in addition to the requirements already listed in Part X of the EPA.

RECORDS KEEPING AND RETENTION

Condition 12.0 is included to ensure that detailed records of Site activities, inspections, monitoring and upsets are recorded and maintained for inspection and information purposes.

CLOSURE

Condition 13.0 is included to ensure that final closure of the Site is completed in accordance with Ministry's standards.

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 October, 2026



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

CM/
c: District Manager, MECP Niagara
Alana Valle B. Eng., Pinchin Ltd.