ENVIRONMENTAL COMPLIANCE APPROVAL
NUMBER 8158-DUPHHB
Issue Date: October 9, 2026

Greenfield Global Inc.
20 Toronto Street, Suite 1400
Toronto, Ontario
M5C 2B8

Chatham-Kent Public Utilities Commission
325 Grand Avenue East
Chatham, Ontario
N7M 5L8

Site Location: Chatham-Kent Waste-To-Energy Project
175 Bloomfield Rd
Chatham-Kent Municipality,
N7M 0N2

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 5.425-hectare waste disposal site (anaerobic digestion facility), to receive and process a maximum of 900,000 tonnes of organic waste per year to generate approximately 27,933,000 Nm3 of biogas per year, maximum 92,345 tonnes of solid digestate per year and maximum 994,625 m3 of wastewater per year.

to be used for processing of the following types of waste generated in the Province of Ontario:

Organic Waste, limited to:

- Sewage sludge from Chatham-Kent Public Utilities Commission
- Biodegradable and Clean organics from Industrial, Commercial, and Institutional sources
- Thin stillage from the Greenfield Ethanol Plant
- Wastewater from the Greenfield Ethanol Plant

and further described in Condition 3.0 of this Approval.

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;

"Anaerobic Digester" means the anaerobic digester used for anaerobic digestion of the approved Organic Waste;

"Anaerobic Digestion" or "AD" means the anaerobic digestion of the approved Organic Waste;

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

"Biogas Treatment and Upgrading System" means the Biogas Treatment and Upgrading System described in the Owner's application, this Approval and in the supporting documentation submitted with the application, to the extent approved by this Approval;

"Biogas Flare" means the biogas flare system described in the Owner's application, this Approval and in the supporting documentation submitted with the application, to the extent approved by this Approval;

"Digestate" means the Organic Waste anaerobically digested through the AD or UASB Reactor at the Site;

"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;

"Human Body Waste" means waste derived from or containing wastes from the human body and are waste from the operation of a sewage works;

"Malfunction" means any sudden, unplanned, infrequent and not reasonably preventable failure of the equipment associated with maintaining or monitoring negative pressure and/or negative air balance in

the WWTP & Process Building, excluding failures that may be caused in part by poor maintenance or negligent operation;

"Manual" means a document or a set of documents that provide written instructions to staff of the Owner;

"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. O. Reg. 267/03" means Ontario Regulation 267/03: (General), made under the NMA;

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

"Organic Waste" means solid and liquid non-hazardous readily biodegradable waste and as further described in Condition 3.1 of this Approval to be received and managed by the Owner;

"Owner" means any person that is responsible for the establishment or operation of the Site being approved by this Approval, and includes Greenfield Global Inc. & Chatham-Kent Public Utilities Commission 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;

"Processed Organic Waste" is as defined as defined in O. Reg. 347;

"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 Organic Waste at the Site and which requires final disposal or further processing off-Site.

"Secondary Containment Area" means the engineered containment system which is designed to provide an effective volume containment of stormwater and spills from tanks and waste processing equipment, as per the Guidelines for Environmental Protection Measures at Chemical and Waste Storage Facilities.

"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 175 Bloomfield Road, Chatham-Kent, Ontario, N7M 0N2;

"Spill" is as defined in the EPA;

"SSO" means organic waste that has been separated from other waste under a program operated by or for a municipality;

"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 Organic Waste loads; and
- the requirements of this Approval.

"UASB" means the Upflow Anaerobic Sludge Blanket; and

"WWTP & Process Building" means the building that houses, in two different zones, both the Wastewater Treatment Plant, and where the Organic Waste is received by truck and pre-processed, prior to transfer to the Buffer Tank and then to the Anaerobic Digester.

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 January 30, 2026, signed by Hisham Hafez, Greenfield Global 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.

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 TYPES AND RATES

3.1 Service Area and Approved Waste Types

(1) The Owner may only accept the following described Organic Waste from the Province of Ontario:

a. Sewage sludge from the Chatham-Kent Public Utilities Commission through:
   i. 80 mm force main from the Chatham Pollution Control Plant (WPCP) into the Dilution Tank and then the Buffer Tank; and
   ii. tanker trucks from the Chatham-Kent's outlying wastewater treatment plants (WWTP) that will unload in the liquid unloading bay next to the WWTP & Process Building.

b. Biodegradable and Clean organics from Industrial, Commercial, and Institutional (ICI) sources that would be received by truck and off-loaded into the live-bottom hopper of the receiving building. These wastes (referred to as "ICI biomass waste" in this Approval) shall meet the waste definition of “waste biomass” from food processing and preparation operations, as per in O.Reg 347 and be limited to the wastes outlined in Schedule 1 and Schedule 2A in O. Reg. 267/03, with the following exclusion:
   i. Paunch manure.

c. Thin stillage from the Greenfield Ethanol Plant will be received through a 200 mm pipeline into the Buffer Tank or Dilution Tank; and

d. Wastewater from the Greenfield Ethanol Plant will be received through a 100 mm pipeline through an in-line basket strainer, then into the Rapid Mix Tank and then into the Upflow Anaerobic Sludge Blanket (UASB) Reactor.

(2) The Owner shall not accept at the Site:

a. any waste that is classified as hazardous waste in accordance with O. Reg. 347;
b. any waste that is classified as "Specified Risk Materials" as defined by the Canadian Food Inspection Agency Feed Act,1993, as amended;
c. manure; and
d. any SSO from curbside collection programs.

3.2 Waste Receipt Rates

(1) The Owner is approved to receive Organic Waste with the combined in maximum quantities of 2,500 tonnes per day (t/d) and 900,000 tonnes per year (t/yr), and individual maximum quantities as follows:

a. Sewage sludge from Chatham WPCP (piped): 290 t/d and 95,800 t/yr
b. Sewage sludge from Chatham-Kent's WWTPs (trucked): 165 t/d and 39,100 t/yr
c. ICI biomass waste (trucked): 75 t/d and 24,300 t/yr
d. Thin stillage from the Greenfield Ethanol Plant (piped): 875 t/d and 280,900 t/yr

e. Wastewater from the Greenfield Ethanol Plant (piped): 1,440 t/d and 482,700 t/yr

4.0. SITE OPERATIONS

4.1 Operating Hours

(1) The Owner shall ensure that the Organic Waste received at the Site by truck or tanker, and waste and Digestate that are removed from the Site by truck occur between the hours of 8:00 a.m. to 7:00 p.m. seven (7) days per week. Organic Waste delivered by pipeline may be received twenty-four (24) hours per day, seven (7) days per week.

(2) 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 Organic Waste Receipt (Truck and Pipeline)

(1) The Owner shall ensure that only waste that is approved under this Approval is received at the Site by following their incoming waste inspection procedure outlined the "Design & Operations Manual", Item 2 of Schedule "A" of this Approval.

(2) For trucks and tankers delivering approved waste types, the incoming waste inspection procedure shall include:

a. Controlling access of trucks and tankers entering the Facility;
b. Each truck and tanker be weighed on the weigh scale and their respective load documentation be examined and recorded;
c. Restricting access to pre-approved haulers with contractual agreements to deliver waste;
d. Conducting waste load inspections prior to unloading which shall include, at a minimum:
    i. Load documentation is verified.
    ii. Visual inspection for load consistency, contaminants (plastics, metals, debris), and odour anomalies.
    iii. Random sampling for solids content and the presence of foreign material, with a minimum sampling rate of 1 per day.

No unloading shall occur until inspection confirms compliance with waste that is approved under this Approval.

(3) For approved waste types delivered by pipeline, the incoming waste inspection procedure shall include:

a. Prior to transfer the source facility shall ensure the waste is as approved waste under this Approval;
b. The owner shall monitor incoming waste for:
    i. Flow rate and totalized volume;
    ii. Temperature and pH; and
    iii. Visual inspection.
c. At least once a week, the owner shall collect grab samples and analyse for COD, BOD, total

solids, and ammonia.

(4) Waste that has not been characterized in accordance with this Approval or that is not accompanied by the required documentation shall not be accepted at the Site and shall immediately be directed off-Site.

(5) Upon arriving at the Site, the truck loaded ICI biomass waste shall be forthwith unloaded within the confines of the WWTP & Process Building.

4.3 Rejected Waste Handling

(1) In the event that an Organic Waste load is 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 250 m^3 of waste shall be stored within the Dilution Tank located outdoors, at any one time. This tank primarily receives sewage sludge piped directly from the Chatham WPCP, and can receive thin stillage from the Greenfield Ethanol Plant for temperature control. This tank is within the Secondary Containment Area.

b. No more than 22.7 m^3 of waste shall be stored within the Pumping Tank located within the WWTP & Process Building, at any one time. This tank receives sewage sludge from Chatham-Kent's WWTP that is delivered by trucked and after the sludge has been pumped through a a macerator and stone trap.

c. No more than 2,300 m^3 of waste shall be stored within the Feedstock Buffer Tank located outdoors, at any one time. This tank receives waste from the dilution tank, the pumping tank, thin stillage piped directly from the Greenfield Ethanol Plant, and ICI biomass waste that have been diluted from liquid wastes originating from the Dilution Tank. This tank is within the Secondary Containment Area.

d. No more than 1,500 m^3 of waste shall be stored within the Wastewater Buffer Tank (WW

Buffer Tank) located outdoors, at any one time. This tank serves as an intermediate equalization and blending tank within the solids handling and dewatering train. The primary function of this tank is to receive and homogenize: Pressate from the dewatering screw presses, and Filtrate from the recuperative thickening unit, prior to controlled and metered discharge to the downstream DAF process. This tank is within the Secondary Containment Area.

e. No more than 85 m^3 of waste shall be stored within the live bottom receiving hopper located within the WWTP & Process Building, at any one time. This hopper receives ICI biomass waste which measures and dispenses the material to a hopper-fed dilution pump then into the Feedstock Buffer Tank.

f. No more than 3 m^3 of Residual Waste shall be stored within a single roll-off bin located within the WWTP & Process Building, at any one time. This waste material is predominantly inorganic (sand, silt, grit), not biosolids, not NASM, and not hazardous waste. It is generated as part of normal PUC sludge pre-processing operations.

(2) No waste may be stored on the floor of the receiving bays within the WWTP & Process Building.

(3) The Owner shall ensure that sufficient storage capacity, as approved in this Approval, is available in the storage areas prior to unloading of the Organic Waste from its transport vehicles or receiving through the associated pipelines.

(4) The Owner shall ensure that the levels in the liquid Organic Waste storage and the processing tanks are monitored and controlled on a continuous basis and that the high level alarms are operational at all times.

(5) There is no storage for dewatered digestate within the Facility. Dewatered digestate shall be loaded directly into trucks within the WWTP & Process Building for removal from site.

(6) Solid putrescible waste generated through activities not relating to the handling and processing of the Organic Waste (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.

(7) Other than the outdoor storage tanks within the Secondary Containment Area, no outside waste storage is approved under this Approval.

(8) In the event that Organic Waste cannot be processed at the Site and the Site is at its approved waste storage capacity, the Owner shall cease accepting additional Organic Waste. Receipt of additional Organic Waste may be resumed once such receipt complies with the waste storage limits approved in this Approval.

4.5 Approved Processing

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

a. receipt of sewage sludge via closed-transfer systems, including hoses and quick-connect couplings located in a dedicated, enclosed liquid reception bay on the outside of the WWTP

& Process Building.

b. processing of sewage sludge through a a macerator and stone trap and the transfer of the processed sewage sludge to the Pumping Tank located within the WWTP & Process Building.

c. receipt of ICI biomass waste into the live bottom receiving hopper located within the WWTP & Process Building. The hopper uses two agitator screws with blades prevent bridging and maintain uniform flow. A discharge screw feeds the waste into the hopper-fed dilution pump, which dilutes the ICI biomass waste with liquid wastes originating from the Dilution Tank, then delivers it into the Feedstock Buffer Tank.

d. receipt of sewage sludge via 80 mm force main from the Chatham WPCP into the Dilution Tank and then the Buffer Tank. Since the material is pumped via a pipeline direct from the WPCP, this material should be clean and free of settleable solids and contaminants, but the sewage sludge can be diverted into the Pumping Tank and from there (if need be), it can be pre-treated for grit separation and then stored in the Buffer Tank.

e. receipt of Thin stillage from the Greenfield Ethanol Plant via a 200 mm pipeline into the Buffer Tank or delivered to the Dilution Tank to maintain adequate operating temperature off the Dilution Tank.

f. receipt of Wastewater from the Greenfield Ethanol Plant via a 100 mm pipeline through an in-line basket strainer, then into the Rapid Mix Tank and then into the UASB Reactor.

g. flow meters will be used to accurately measure the amount received of each liquid waste stream.

h. transfer of the solid Residual Waste to the roll-off bin located within the WWTP & Process Building for temporary storage prior to shipping to a Ministry-approved waste disposal site for final disposal or further processing

i. transfer of the sewage sludges, thin stillage, and ICI biomass waste, from the Buffer Tank, to the Primary and Secondary Anaerobic Digesters for anaerobic digestion;

j. anaerobic digestion of the waste in the Anaerobic Digesters and the temporary storage of the Biogas within the Anaerobic Digester's double membrane.

k. the UASB Reactor will treat the Wastewater from the Greenfield Ethanol Plant and collect Biogas.

l. digestate from both the Anaerobic Digesters and the UASB Reactor will be combined, treated with Ferric Chloride and dry polymer, dewatered, and transferred directly into trucks within the WWTP & Process Building for removal from site.

m. treating of wastewater from both the filtrate and pressate from dewatering digestate from the Anaerobic Digestion process and the wastewater discharged from the UASB Reactor.

n. Biogas treatment and upgrading in the Biogas Treatment and Upgrading System.

o. emergency flaring of the Biogas.

p. use of emergency pressure relief valves.

(2) The Owner shall ensure that the incoming Organic Waste received at the Site, and handled in accordance with this Approval, is used as a feedstock in the on-Site Anaerobic Digesters or used in the UASB Reactor.

(3) The Owner shall ensure that all windows and doors of the WWTP & Process Building are closed at all times, except when the doors are used for necessary personnel or vehicle entrance and exit.

(4) The Owner shall ensure that continous airflow into the building or negative air pressure is maintained at all times within the WWTP & Process Building where waste is exposed to the air.

4.6 Anaerobic Digestion

(1) No more than 10,200 m^3 of the Organic Waste shall be contained and processed within each of the two (2) Anaerobic Digesters located at the Site, at any one time.

(2) The Anaerobic Digesters shall be located outdoors, be constructed above grade, as proposed in the supporting documentation listed in the attached Schedule "A".

(3) The Anaerobic Digesters shall be mechanically mixed, insulated, heated and covered with a double membrane cover with a maximum permeability of <400 cm^3/m^2.bar.d., as proposed in the supporting documentation listed in the attached Schedule “A”.

(4) The treatment of the Organic Waste in the Anaerobic Digesters shall be carried out in the mesophilic temperature range, with the minimum operating temperature of 35°C during normal operations, as proposed in the supporting documentation listed in the attached Schedule "A", at all times.

(5) The Owner shall operate the Anaerobic Digesters such that the yearly average hydraulic retention time of the Organic Waste is maintained at not less than 20 days.

(6) The liquid level, temperature and duration of the processing in the Anaerobic Digesters shall be monitored to verify compliance with Conditions 4.6(4) and (5).

(7) Hydrogen sulphide removal shall be carried out in accordance with the supporting documentation listed in the attached Schedule "A".

(8) The Owner shall electronically monitor the over/under pressure relief valves on the Anaerobic Digesters, to ensure that if they are open, it is recorded and the Owner is notified. Should any unintentional raw (untreated) Biogas be released from the over/under pressure relief values to the atmosphere, regardless of quantity, the Owner shall immediately notify the **Ministry's Spills Action Centre at 1-800-268-6060**.

(9) The Owner shall ensure that head space of the anaerobic digesters and UASB Reactor is treated

through the Biogas Treatment and Upgrading System, as proposed in the supporting documentation listed in Schedule "A" and approved in this Approval.

(10) The Owner shall obtain an Environmental Compliance Approval under Section 9 of the EPA, and follow the conditions within that approval to ensure that the air space between the double membrane roof for the anaerobic digesters and UASB Reactor prior to being released to the atmosphere.

4.7 Upflow Anaerobic Sludge Blanket (UASB) Reactor

(1) The Wastewater from the Greenfield Ethanol Plant shall be the only feedstock for the UASB Reactor, where Biogas is produced and captured.

(2) The Wastewater from the Greenfield Ethanol Plant shall pass through a Influent Static Mixer and enter the Rapid Mix Tank prior to being pumped into the UASB Reactor. Within the Mixer and Rapid Mix Tank chemicals and nutrients including Ferric Chloride, Sodium Hydroxide, and Micronutrients shall be added to condition the wastewater for efficient anaerobic digesting in the UASB Reactor, as proposed in the supporting documentation listed in the attached Schedule "A".

(3) The UASB Reactor shall be operated, as proposed in the supporting documentation listed in the attached Schedule "A".

(4) The effluent from the UASB Reactor shall be combined with the Filtrate and Pressate from the AD process, and treated by the Wastewater Treatment System.

(5) The Digestate from the UASB Reactor shall be combined with the Digestate from the AD process, treated and dewatered, and shipped from the Site.

4.8 Biogas Management

(1) Biogas shall be treated as follows in the Biogas Treatment and Upgrading System:

a. cooling, condensing and and moisture removal;
b. use of a biogas pressure boosting blower system to ensure that the biogas can pass through the treatment system;
c. removal of hydrogen sulphide using ferric based adsorption media;
d. removal of VOCs and siloxanes using selective Activated Carbon Adsorption media;
e. compression, chilling, and further moisture removal;
f. removal of any oil mist from the compressor using an activated carbon system;
g. upgrade to renewable natural gas in a 3-stage membrane system by removing carbon dioxide from methane; and
h. final compression of the produced Renewable Natural Gas to pipeline pressure.

(2) The Owner shall maintain the Biogas flare system as a fully functional stand-by system, so that in the instance of a process upset and/or when the Biogas Treatment and Upgrading System is inoperable or producing Renewable Natural Gas that is out of compliance with the required quality criteria, the flare

may be utilized to combust the Biogas.

(3) Treated Biogas which does not meet the required Renewable Natural Gas quality criteria shall be transferred to the flare for flaring.

(4) Any condensate from the treating of the Biogas shall be directed to either the Buffer Tank or the Wastewater Treatment System.

(5) The Biogas and the Renewable Natural Gas 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 Digestate Handling

(1) The Digestate generated by the Anaerobic Digesters and UASB Reactor shall be treated and dewatered prior to being loaded into the transfer vehicles within the confines of the WWTP & Process Building. The resulting pressate shall be pumped into the WW Buffer Tank.

(2) Any spills or drips of the Digestate shall be promptly cleaned up before the transfer vehicle leaves the loading area.

(3) The Owner shall ensure that the Digestate is covered when removed from the WWTP & Process Building and during transport to its final disposal site.

(4) If the Digestate is managed as a waste either destined for further waste processing, application on non-agricultural land or final disposal, the Digestate shall be considered a Processed Organic Waste and the Owner shall ensure that the Digestate:

a. is transferred to a site that is approved to accept such waste through an ECA, as required under Section 27 of the EPA; and
b. is sampled, tested and meets quality requirements of the ECA of the receiving site.

(5) If the Digestate is managed as a material destined for land application on agricultural land, the Digestate shall be considered a NASM and the Owner shall ensure that the Digestate:

a. is transferred to a site that is approved to accept NASM in accordance with the requirements set out under a NASM Plan, as required O.Reg. 267/03 of the NMA;
b. is sampled, tested and meets quality requirements under the NASM Plan for the receiving site; and
c. written notification must be supplied to the receiving site's owner that the Digestate contains Human Body Waste so that the receiving site owner can determine the applicable regulatory requirements under O.Reg. 267/03.

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 a single roll-off bin located in the WWTP & Process Building.

(3) The Owner shall remove the Residual Waste from the Site when the roll-off bin is full.

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

4.11 Wastewater Treatment

(1) The Owner shall treat all effluent from the waste processing at the Site prior to discharge to the Chatham-Kent's municipal sanitary sewer, as proposed in the supporting documentation listed in the attached Schedule "A".

(2) The Wastewater Treatment shall consist of:

a. WW Buffer tank;
b. two (2) Dissolved Air Flotation (DAF) units;
c. Anoxic Tank;
d. two (2) Aeration Tanks;
e. Membrane Backpulse Tank;
f. Membrane Tank with Overflow Tank;
g. Filtrate Buffer Tank;
h. Caustic Tank;
i. Chemical dosing of Sodium Hypochlorite, Sodium hydroxide, Citric Acid, Antifoam, Polymer, Methanol (Carbon Source), and Ferric chloride; and
j. associated equipment such as pumps, strainers, blowers, pipes, valves, and other equipment as needed.

(3) Prior to discharging into Chatham-Kent's municipal sanitary sewer, the Owner shall ensure that the treated effluent meets either

a. the Chatham-Kent's Sewer Use Bylaw; or
b. effluent limits agreed up, in writing, with the Corporation of the Municipality of Chatham-Kent.

(4) The Owner shall follow any requirements imposed by the Municipality of Chatham-Kent regarding the discharge to their municipal sanitary sewer.

4.12 Secondary Containment Area

(1) The Owner shall ensure that if the following are located outside they shall be within the Secondary Containment Area:

a. all tanks;
b. Anaerobic Digesters; and
c. waste processing equipment that contain waste or process waste.

(2) The Secondary Containment Area shall be constructed and operated as described in Items 1 through 5, and 7 of Schedule "A" of this Approval, which includes, but not limited to:

a. four secondary containment areas (not including transformer or interior of buildings) consisting of;
   i. Ferric chloride containment area;
   ii. Buffer Tank and Dilution Tank containment area;
   iii. Main secondary containment area housing the rest of the tanks, Anaerobic Digesters and the waste processing equipment that contain waste or process waste; and
   iv. Additional secondary containment capacity area.
b. The secondary containment areas listed in Condition 4.12(2)a.i., ii. and iii, above, shall be lined using a Linear Low-Density Polyethylene (LLDPE) synthetic liner with the minimum requirements of 40 mil thickness and a hydraulic conductivity of $1x10^{-9}$ m/sec.
c. The additional secondary containment capacity area (Condition 4.12(2)a.iv. above) shall be lined using a geosynthetic clay liner with the minimum requirements of a high swelling sodium bentonite between two (2) layers of geotextile fabric having a saturated hydraulic conductivity of $1x10^{-9}$ m/sec.
d. All piping connecting the tanks, Anaerobic Digesters and the waste processing equipment that are within the Secondary Containment Area shall be located above ground level.
e. Twelve (12) Primary Containment Monitoring Stations shall be installed as shown in Item 5 of Schedule "A". This consists of two (2) monitoring stations at each of the following tanks: Digester 1; Digester 2; Buffer Tank for AD; Wastewater Buffer Tank; and 2 Aeration Tanks. The top of the monitors shall be surveyed for location and elevation. The elevation survey shall be to a local or Provincial/Federal benchmark.

(3) The Owner shall monitor and collect samples at each Primary Containment Monitoring Station on a monthly basis, or if a tank leak is suspected, whichever is less frequent, for the following minimum parameters:

a. Elevation of top of water within the monitor;
b. pH (field);
c. Total Suspended Solids (TSS)
d. Oil and Grease (O&G)
e. Chemical Oxygen Demand (COD)
f. Dissolved Organic Carbon (DOC)
g. Biochemical Oxygen Demand, 5-Day (BOD_5)

(4) The Owner shall enact the Contaminated Secondary Containment Area Protocol, as described in Item 7 of Schedule "A", if any parameter monitored in Condition 4.12(3) exceeds the applicable Discharge Trigger Concentrations as outlined below:

a. pH (field): 6.0 to 8.5 (above or below these values)

b. Total Suspended Solids (TSS): 50 mg/L
c. Oil and Grease (O&G): 15 mg/L
d. Chemical Oxygen Demand (COD): 20 mg/L
e. Dissolved Organic Carbon (DOC): 15 mg/L
f. Biochemical Oxygen Demand, 5-Day (BOD_5): 15 mg/L

(5) Construction of the at the Secondary Containment Area and associated equipment listed in Condition 4.12(1) shall not commence until the Owner has submitted to the Director an updated Hydrogeological Assessment of the Site, as per Condition 7, and this Hydrogeological Assessment is approved by the Director.

4.13 Ventilation

(1) The Owner shall develop a negative pressure assessment plan, prepared by a Professional Engineer, not later than six (6) months prior to receipt of any Organic Waste at the Site, or as directed or agreed to in writing by the District Manager, for performing negative pressure assessment for the fully enclosed WWTP & Process Building and for identifying ideal methodology for achieving and monitoring negative pressure. The plan shall include as a minimum, but not limited to, the following:

a. drawings showing:
   i. layout of the Site and the Facility;
   ii. identification of enclosures, if required; and
   iii. proposed locations for the pressure monitoring sensors for each enclosure;
b. details of the monitoring instruments;
c. identification of:
   i. pressure monitoring sensor technology, numbers and location of negative pressure monitoring sensors within the fully enclosed WWTP & Process Building to avoid false positive readings;
   ii. weather and other atmospheric impacts; and
   iii. ideal target negative pressure and negative air balance for the fully enclosed WWTP & Process Building, including the need to install any additional fans required to maintain the target negative pressure and negative air balance within the fully enclosed WWTP & Process Building;
d. impacts of the four (4) bay doors operating practices, including a recommendation on appropriate face-velocity on doors and entranceways;
e. air changes in the fully enclosed WWTP & Process Building with a recommendation of minimum air exchanges;
f. instrument calibration schedule;
g. data collection, logging and reporting frequency;
h. alarm levels and triggers;
i. consideration of remedial actions if an alarm is triggered;
j. an evaluation of the negative pressure and air balance inside the fully enclosed WWTP & Process Building;
k. the monitoring period duration for the negative pressure assessment for the fully enclosed WWTP & Process Building;
l. frequency and methodology for performing the negative pressure assessment;
m. smoke test;

n. detailed evaluation of the SCADA control system associated with negative pressure ventilation, including adequacy and accuracy;
o. notification requirement to the District Manager; and
p. reporting on the negative pressure assessment, including an analysis of the results and recommendations.

(2) The Owner shall perform the negative pressure assessment for the fully enclosed WWTP & Process Building, not later than three (3) months prior to receipt of any waste at the Facility, or as directed or agreed to in writing by the District Manager.

(3) The Owner shall submit a report, prepared by a Professional Engineer, on the negative pressure assessment for the fully enclosed WWTP & Process Building to the Director and the District Manager not later than two (2) months after completing the negative pressure assessment. The report shall include but not be limited to:

a. an executive summary;

b. description of the building ventilation and negative pressure monitoring system;

c. results of the negative pressure assessment, including an indication of,

i. whether the ventilation system is capable of achieving and maintaining 1) at all times, adequate negative pressure (rolling arithmetic average over 30 minute period) as compared to the ambient atmospheric pressure, excluding any time periods of Malfunction, 2) at all times, adequate negative air balance (rolling arithmetic average over 30 minute period), excluding any time periods of Malfunction, 3) the appropriate face-velocity on doors and entranceways, and 4) the appropriate number of air changes per hour in the WWTP & Process Building;

ii. whether the negative pressure monitoring system follows ideal methodology for data collection, monitoring and reporting of the negative pressure within the WWTP & Process Building;

iii. whether any part of the negative pressure ventilation and monitoring system is inadequate for the purposes of odour containment within the WWTP & Process Building;

d. recommendations including the need to install any additional fans or ducting required to maintain the target air changes per hour, negative pressure and negative air balance within the WWTP & Process Building and to maintain the appropriate face-velocity on doors and entranceways;

(4) The Owner shall implement the recommendations identified in the negative pressure assessment report, prior to receipt of any Organic Waste at the Site, or as directed or agreed to in writing by the District Manager.

(5) If the District Manager is of the opinion that, the ventilation system, or part thereof, is not adequately maintaining negative pressure within the WWTP & Process Building, or the negative pressure assessment is not prepared in accordance with the negative pressure assessment plan required by this Approval, then the District Manager may require re-assessment of the ventilation system.

5.0 SITE INSPECTIONS AND MAINTENANCE

5.1 Inspections

(1) Thirty (30) days prior to the first receipt of Organic Waste at the Site or as acceptable to the District Manager, the Owner shall prepare a comprehensive written inspection program which includes procedures for inspections of all aspects of the Site's operations including the following:

a. Organic Waste, Digestate and any other waste loading/unloading/storage/handling areas;
b. condition of all major pieces of the Equipment;
c. condition of all instruments for monitoring required under this Approval;
d. security fence and property line; and
e. presence of the on and off-Site litter.

(2) The inspection program shall be up-dated, as required, shall be retained at the Site and be made available for inspection by a Provincial Officer, upon request.

(3) The inspections required in Condition 5.1(1) shall be undertaken daily by the Trained Personnel in accordance with the inspection program to ensure that all Equipment and facilities at the Site are maintained in good working order at all times and that no off-Site impacts are occurring. Any deficiencies detected during these regular inspections must be promptly corrected.

5.2 Spare Parts

(1) The Owner shall prepare a list of critical spare parts and update this list annually or more frequently, if necessary, to ensure that this list is maintained up-to-date. The list shall be retained at the Site and be made available for inspection by a Provincial Officer, upon request.

(2) The Owner shall ensure that the critical spare parts are available at the Site at all times or be immediately available from an off-Site supplier.

5.3 Maintenance

(1) The Owner shall develop and implement a preventative maintenance program for all on-Site equipment associated with the processing and managing of wastes.

(2) The preventative maintenance program referred to in Condition 5.3(1) shall be maintained up-to-date, be retained at the Site and be available for inspection by a Provincial Officer, upon request.

6.0 NUISANCE IMPACT CONTROL AND HOUSEKEEPING

6.1 Trucks and Traffic

(1) The Owner shall visually inspect the vehicles that have delivered the Organic Waste to the Site for evidence of leaking or dripping waste. The Owner of the vehicles that leak shall be given a

written notice of the presence of the leak. The notice shall include the vehicle owner's name, the vehicle Environmental Compliance Approval number, the type of Organic Waste delivered to the Site and the date of the delivery. A copy of the notice shall be retained at the Site and it shall be provided to the Ministry staff upon request.

(2) The Owner shall ensure that the exterior of all vehicles delivering the Organic Waste to the Site are washed prior to their departure from the Site, as appropriate.

(3) 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.

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

(5) The Owner shall ensure that all new drivers of vehicles transporting waste to and from the Site are instructed/trained on the acceptable on-Site traffic routes.

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

(7) 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.

(8) The Owner shall ensure that all drivers of vehicles making deliveries and removing waste from to the Site are made aware of the protocols to manage opening and closing of the doors in the buildings at the Site.

(9) The Owner shall determine the Site access truck traffic routes and shall ensure that all drivers of vehicles making deliveries and removing waste from to the Site are made aware of the traffic routes restrictions and requirements.

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 the floor of the Organics Receiving Building is cleaned regularly, including being washed down, as required.

(2) The Owner shall regularly clean all equipment used to handle and process the Organic Waste at the Site, as required.

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

7.0 HYDROGEOLOGICAL ASSESSMENT

(1) The Owner shall update the Hydrogeological Assessment as outlined in Item 6 of Schedule "A" of this Approval.

(2) The Owner shall submit to the Director for approval the results of the updated Hydrogeological Assessment in a completed Hydrogeology Study Report.

(3) The Owner shall ensure that the Hydrogeology Study Report contains details on any groundwater monitoring and/or contingency plans, if they are determined to be needed.

8.0 COMPLAINT RESPONSE PROCEDURE

(1) A designated representative of the Owner shall be available to receive public complaints caused by the operations at the Site twenty-four (24) hours per day, seven (7) days per week.

(2) 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 in a computerized tracking system. 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 in the tracking system, 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 Facility 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 Facility 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 in the tracking system.

(3) If the District Manager deems the remedial measures taken as per Condition 8.0(2)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 OPERATIONS MANUAL AND STAFF TRAINING

9.0 Operations Manual

(1) Three (3) months prior to receiving Organic Waste at the Site, the Owner shall prepare and submit to the District Manager an Operations Manual for use by the Site personnel. As a minimum, the Operations Manual shall contain the following:

a. outline the responsibilities of Site personnel;
b. personnel training protocols;
c. waste receiving and screening procedures;
d. waste unloading, handling, storage and processing procedures;
e. process monitoring procedures;
f. sampling and testing procedures;
g. Site inspections, spill, fire, upset and leakage recording procedures;
h. procedure for handling complaints as described in this Approval.

(2) A copy of the Operations Manual shall be kept at the Site, must be accessible to personnel at all

times and must be updated, as required.

9.2 Staff 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 Organic 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 Operations Manual.

(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 <u>CONTINGENCY MEASURES AND EMERGENCY SITUATION RESPONSE PLAN</u>

(1) Prior to any processing of the Organic Waste in the Anaerobic Digesters, the Owner shall prepare and finalize a Contingency Measures and Emergency Situation Response Plan. The Contingency Measures and Emergency Situation Response Plan shall be prepared in consultation with the District Manager, the local Municipality and the Fire Department. The Contingency Measures and Emergency Situation Response Plan, as a minimum, shall include 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. a list of equipment and clean up materials available for dealing with the emergency situations, including the location of these;

c. 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;

d. procedures and actions to be taken should the incoming Organic Waste not meet the quality

criteria specified by this Approval and requires removal from the Site as set out in this Approval; and

e. procedures and actions to be taken should the occurrence of the substantiated complaints require the Owner to suspend the Organic Waste processing activities at the Site.

(2) Prior to any processing of the Organic Waste in the Anaerobic Digesters, approval of the Contingency Measures and Emergency Situation Response Plan shall be obtained from the Fire Department and the municipality and submitted to the District Manager.

(3) An up-to-date version of the Contingency Measures and Emergency Situation Response Plan 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 Contingency Measures and Emergency Situation Response Plan shall be reviewed on an annual basis and updated, if necessary. The revised version of the Contingency Measures and Emergency Situation Response Plan 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 Contingency Measures and Emergency Situation Response Plan, to handle the emergency situations occurring at the Site.

(2) The Owner shall ensure that the equipment and materials outlined in the Contingency Measures and Emergency Situation Response Plan 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 Contingency Measures and Emergency Situation Response Plan, 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 Organic Waste received at the Site by truck and pipeline, including the incoming Organic Waste characterization results, or published characterization data, as applicable;
c. quantity and type of waste processed at the Site, including the waste inputted into the Anaerobic Digester*;*
d. quantity and type of waste present at the Site, including the Organic Waste in storage and the Organic Waste levels in the Anaerobic Digester and the UASB Reactor;
e. amount of Digestate transferred from the Anaerobic Digester through the Truck Loading Conveyor to the loading of trucks;
f. amount of Digestate shipped from the Site, its categorization and destination;
g. amount of Treated Wastewater discharged from the Site and into the Chatham-Kent Sanitary Sewer;
h. quantity of the Residual Waste shipped for final disposal, the name of the receiving site and its Environmental Compliance Approval number;
i. quantity and type of any Rejected Waste rejected from the Site;
j. housekeeping activities, including litter collection, washing/cleaning activities, etc.
k. date and the quantity of Biogas generated at the Site;
l. date and the quantity of Renewable Natural Gas transferred from the Site to the natural gas distribution infrastructure, including any required characterization results;
m. date and duration of the flare being used for Biogas flaring.

(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 Sampling and Testing Records

(1) The Owner shall establish and maintain a written or digital record of all sampling and testing activities at the Site. This record shall include, as a minimum, the following information:

a. waste sampled, sample collection locations and volume collected;
b. day and time of collection;
c. sample handling procedures;
d. parameters tested for and the resulting concentrations;
e. name of the laboratory facility conducting the testing; and
f. conclusions drawn with respect to the results of the monitoring and testing.

12.6 Monitoring Records

(1) The Owner shall establish and maintain a written or digital record of all monitoring activities at the Site as required by this Approval.

12.7 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.

12.8 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 quality and the quantity of all incoming Organic Waste and outgoing Digestate, Residual Waste and Rejected Waste, including analytical data required to

characterize the waste;

c. an annual waste receipt rates of Organic Waste as approved in Condition 3.2(1);
d. material balance for each month documenting the amount of Organic Waste present/stored and in-process at the Site;
e. a monthly summary of the quality and the quantity of the Digestate transferred through the Truck Loading Conveyor to the loading of trucks;
f. a monthly summary of the quality and the quantity of the Digestate shipped from the Site and its end-use designation and its final end-use destination and address;
g. a monthly summary of the quality and the quantity of the Treated Wastewater discharged from the Site and into the Chatham-Kent Sanitary Sewer;
h. a monthly summary of the monitoring of the Primary Containment Monitoring Stations;
i. an annual summary of any groundwater monitoring and/or contingency plans, if they are determined to be needed through the Hydrogeological Assessment;
j. annual amount of Biogas produced at the Site;
k. annual amount of Renewable Natural Gas transferred from the Site to the natural gas distribution infrastructure;
l. annual duration of the flare being used for Biogas flaring;
m. 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;
n. any recommendations to minimize environmental impacts from the operation of the Site and to improve Site operation and monitoring programs in this regard;
o. a summary of any complaints received and the responses made;
p. a summary of any emergency situations that have occurred at the Site and how they were handled;
q. a summary of all inspections and maintenance carried out at the Site; and
r. any other information the District Manager requires from time to time.

12.9 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 CLOSURE

(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 Hisham Hafez, Senior Director, RNG Projects and dated January 30, 2026, and co-signed by Darren Galbraith, General Manager, Chatham-Kent PUC, dated June 4, 2026.
2. Design & Operations Manual, Chatham-Kent Anaerobic Digestion Facility, Greenfield Global, Anaerobic Digestion Facility. Stonecrest Engineering Inc. June 25, 2026.
3. Emails and attachments from Steve Smith, RWDI to Christopher Munro, MECP, dated:
   a. June 12, 2026
   b. June 17, 2026
   c. June 26, 2026
   d. July 8, 2026
   e. August 20, 2026
   f. August 26, 2026
   g. September 3, 2026
4. Chatham Anaerobic Digestion Poject, Stormwater Management and Secondary Containment Design Brief, 175 Bloomfield Road, Chatham, Ontario. Stonecrest Engineering Inc. June 11, 2026.
5. Greenfield Global Inc., Anaerobic Digester Site, Environmental Compliance Drawings, Signed and Sealed by N.A. Hendry, Stonecrest Engineering Inc. September 2, 2026:
   a. Secondary Containment Details, Page Number SC1.0
   b. Secondary Containment Details, Page Number SC1.1
   c. Secondary Containment Details, Page Number SC1.2
6. Memorandum to Hisham Hafez, Greenfield Global Inc., from Brad Bergeron and Phil Janisse, RWDI. Re: Hydrogeology Study: RWDI Reference No. 2402117. Dated August 25, 2026.
7. Report on the Geotechnical Investigation for the Future Development at the South End of 650 Riverview Drive, Chatham, Ontario. Soil & Materials Engineering Inc. August 20, 2015.
8. Proposed Stormwater and Secondary Containment Water Monitoring Program, Version 04, Dated June 18, 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.

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 Organic Waste receipt rate, the approved Organic Waste types and the service area from which the Organic 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 Organic Waste types are accepted and handled/processed at the Site.

Conditions 4.3 through 4.13 are included to ensure that waste, including Biogas, 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 Biogas 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.

HYDROGEOLOGICAL ASSESSMENT

Condition 7.0 is included to ensure that the groundwater at the Site is assessed and monitored in an environmentally acceptable manner which does not result in a negative impact on 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.

OPERATIONS MANUAL AND STAFF 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.

CONTINGENCY MEASURES AND EMERGENCY SITUATION RESPONSE 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
135 St. Clair Avenue West, 1st Floor
Toronto, Ontario
M4V 1P5

*** Further information on the Ontario Land Tribunal's requirements for an appeal can be obtained directly from the Tribunal at: Tel: (416) 212-6349 or 1 (866) 448-2248, or www.olt.gov.on.ca**

This instrument is subject to Section 38 of the *Environmental Bill of Rights,* 1993, that allows residents of Ontario to seek leave to appeal the decision on this instrument. Residents of Ontario may seek leave to appeal within 15 days from the date this decision is placed on the Environmental Registry. By accessing the Environmental Registry at https://ero.ontario.ca/, you can determine when the leave to appeal period ends.

The above noted activity is approved under s.20.3 of Part II.1 of the *Environmental Protection Act.*

DATED AT TORONTO this 9th day of October, 2026



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

CM/
c: Area Manager, MECP Windsor
c: District Manager, MECP Sarnia
Scott Pitsch, RWDI AIR Inc.