



AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 9151-8VDQQH

Issue Date: January 25, 2013

Heico 2002 Member, Inc.
as the general partner of Ivaco Rolling Mills 2004 L.P.
1040 County Road 17
L'Original, Ontario
K0B 1K0

Site Location: 1040 County Road 17 L'Original
Champlain Township, United Counties of Prescott and Russell

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:

Description Section

- Electric Arc Furnace (EAF) Process with Baghouse Exhaust System;
- Continuous Casting Process;
- Billet Conditioning Process;
- Reheat Furnace;
- Rolling Mill Process; and
- Ladle Curing Process;

including the Equipment and any other ancillary and support processes and activities, operating at a Facility Production Limit of up to 725,000 metric tonnes of steelmaking capacity per year with a peak production capacity of 90 metric tonnes of steel making capacity per hour; and up to 900,000 metric tonnes of wire rod making capacity per year with a peak production capacity of 150 metric tonnes of wire rod per hour and the entire facility discharging to the air as described in the Original ESDM Report.

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

1. "Acceptable Maximum Ground Level Concentration" means a concentration accepted by the Ministry, as described in the Guide to Applying for Approval (Air & Noise), for a Compound of Concern listed in the Original ESDM Report that:

(a) has no Ministry Point of Impingement Limit and no Jurisdictional Screening Level, or

(b) has a concentration at a Point of Impingement that exceeds the Jurisdictional Screening Level.

2. "Acoustic Assessment Report" means the report, prepared in accordance with Publication NPC-233 and Appendix A of the Basic Comprehensive User Guide, by Galen Wong and Joe Tomaselli, Golder Associates Ltd, dated May 7, 2012 submitted in support of the application, that documents all sources of noise emissions and Noise Control Measures present at the Facility and includes all updated Acoustic Assessment Reports as required by the Documentation Requirements conditions of

this *Approval* to demonstrate continued compliance with the *Performance Limits* following the implementation of any *Modification*.

3. "*Acoustic Assessment Summary Table*" means a table prepared in accordance with the *Basic Comprehensive User Guide* summarising the results of the *Acoustic Assessment Report*, up-dated as required by the Documentation Requirements conditions of this *Approval*.

4. "*Acoustic Audit*" means an investigative procedure consisting of measurements and/or acoustic modelling of all sources of noise emissions due to the operation of the *Facility*, assessed to determine compliance with the Performance Limits for the *Facility* regarding noise emissions, completed in accordance with the procedures set in *Publication NPC-103* and reported in accordance with *Publication NPC-233*.

5. "*Acoustic Audit Report*" means a report presenting the results of an *Acoustic Audit*, prepared in accordance with *Publication NPC-233*.

6. "*Acoustical Consultant*" means a person currently active in the field of environmental acoustics and noise/vibration control, who is familiar with *Ministry* noise guidelines and procedures and has a combination of formal university education, training and experience necessary to assess noise emissions from a *Facility*.

7. "*Air Standards Manager*" means the Manager, Human Toxicology and Air Standards Section, Standards Development Branch, or any other person who represents and carries out the duties of the Manager, Human Toxicology and Air Standards Section, Standards Development Branch, as those duties relate to the conditions of this *Approval*.

8. "*Air Quality Monitoring Manual*" means the ambient air monitoring program carried out in accordance with the publication titled "Operations Manual for Air Quality Monitoring" prepared by Ontario Ministry of the Environment Operations Division Technical Support Section, publication No. PIBS 6687e dated March 2008 and includes any subsequent revisions.

9. "*Approval*" means this entire Environmental Compliance Approval and any *Schedules* to it.

10. "*Baghouse Leak Detection System*" means a system that is capable of continuously monitoring relative particulate matter loadings in the exhaust of a baghouse to detect bag leaks and other upset conditions, and is equipped with an audible alarm system, located where it is easily heard by operating personnel at the *Facility*, that will sound automatically when an increase in relative particulate matter emissions over a preset level is detected and alert the operating personnel of the upset condition for implementing corrective action.

11. "*Basic Comprehensive User Guide*" means the *Ministry* document titled "Basic Comprehensive Certificates of Approval (Air) User Guide" dated March 2011, as amended.

12. "*Best Management Practices Plan*" means a document or a set of documents which describe measures to minimize dust emissions from the *Facility* and/or *Equipment*.

13. "*Company*" means Heico 2002 Member, Inc. as the general partner of Ivaco Rolling Mills 2004 L.P. and includes any successors and assigns in accordance with section 19 of the *EPA*.

14. "*Compound of Concern*" means a contaminant that, based on generally available information, may be discharged to the air in a quantity from the *Facility* that:

(a) is non-negligible in accordance with section 26(1)4 of *O. Reg. 419/05* in comparison to the relevant *Ministry Point of Impingement Limit*; or

(b) if a *Ministry Point of Impingement Limit* is not available for the compound, may cause an adverse effect at a *Point of Impingement* based on generally available toxicological information.

15. "*Description Section*" means the section on page one of this *Approval* describing the *Company's* operations and the *Equipment* located at the *Facility* and specifying the *Facility Production Limit* for the *Facility*.
16. "*Director*" means a person appointed by the Minister pursuant to section 5 of the *EPA*.
17. "*District Manager*" means the District Manager of the appropriate local district office of the *Ministry*, where the *Facility* is geographically located.
18. "*Emission Summary Table*" means the most updated table contained in the *ESDM Report*, which is prepared in accordance with section 26 of *O. Reg. 419/05* and the *Procedure Document* listing the appropriate *Point of Impingement* concentration for each *Compound of Concern* from the *Facility* and providing comparison to the corresponding *Ministry Point of Impingement Limit* or *Maximum Concentration Level Assessment*, or *Jurisdictional Screening Level*.
19. "*Environmental Assessment Act*" means the Environmental Assessment Act, R.S.O. 1990, c.E.18, as amended.
20. "*EPA*" means the Environmental Protection Act, R.S.O. 1990, c.E.19, as amended.
21. "*Equipment*" means equipment or processes described in the *ESDM Report*, this *Approval* and in the *Schedules* referred to herein and any other equipment or processes.
22. "*Equipment with Specific Operational Limits*" means any *Equipment* related to the thermal oxidation of waste or waste derived fuels, fume incinerators or any other *Equipment* that is specifically referenced in any published *Ministry* document that outlines specific operational guidance that must be considered by the *Director* in issuing an *Approval*.
23. "*ESDM Report*" means the most current Emission Summary and Dispersion Modelling Report that describes the *Facility*. The *ESDM Report* is based on the *Original ESDM Report*, and is prepared after the issuance of this *Approval* in accordance with section 26 of *O. Reg. 419/05* and the *Procedure Document* by the *Company* or its consultant.
24. "*Facility*" means the entire operation located on the property where the *Equipment* is located.
25. "*Facility Production Limit*" means the production limit placed by the *Director* on the main product(s) or raw materials used by the *Facility*.
26. "*Independent Acoustical Consultant*" means an *Acoustical Consultant* not representing the *Company*, and not involved in the noise impact assessment or the design/implementation of *Noise Control Measures* for the *Facility/Equipment*. The *Independent Acoustical Consultant* shall not be retained by the consultant involved in the noise/vibration impact assessment or the design/implementation of noise/vibration control measures for the *Facility/Equipment*.
27. "*Jurisdictional Screening Level*" means a screening level for a *Compound of Concern* that is listed in the *Ministry* publication titled "Jurisdictional Screening Level (JSL) List, A Screening Tool for Ontario Regulation 419: Air Pollution - Local Air Quality", dated February 2008, as amended.
28. "*Log*" means the up-to-date log that is used to track all *Modifications* to the *Facility* since the date of this *Approval* as required by the Documentation Requirements conditions of this *Approval*.
29. "*Maximum Concentration Level Assessment*" means the Maximum Concentration Level Assessment for the purposes of an *Approval*, described in the *Basic Comprehensive User Guide*, prepared by a *Toxicologist* using currently available toxicological information, that demonstrates that the concentration at any *Point of Impingement* for a *Compound of Concern* that does not have a *Ministry Point of Impingement Limit* is not likely to cause an adverse effect as defined by the *EPA*.

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

31. "*Ministry Point of Impingement Limit*" means the applicable Standard set out in Schedule 2 or 3 of *O.Reg. 419/05* or a limit set out in the *Ministry* publication titled "Summary of Standards and Guidelines to support Ontario Regulation 419: Air Pollution - Local Air Quality (including Schedule 6 of *O. Reg. 419* on Upper Risk Thresholds)", dated April 2012, as amended.

32. "*Modification*" means any construction, alteration, extension or replacement of any plant, structure, equipment, apparatus, mechanism or thing, or alteration of a process or rate of production at the *Facility* that may discharge or alter the rate or manner of discharge of a *Compound of Concern* to the air or discharge or alter noise or vibration emissions from the *Facility*.

33. "*Noise Abatement Action Plan*" means the noise abatement program developed by the *Company*, submitted to the *Director* and *District Manager* and approved by the *Director*, designed to achieve compliance with the sound level limits set in Ministry Publication NPC-205, as applicable. It also means the Revised Ivaco Rolling Mills 2004 L.P. *Noise Abatement Action Plan* dated November 2, 2012 and signed by Galen Wong and Joe Tomaselli, Golder Associates Ltd., described in *Schedule "F"*.

34. "*Noise Control Measures*" means measures to reduce the noise emissions from the *Facility* and/or *Equipment* including, but not limited to, silencers, acoustic louvers, enclosures, absorptive treatment, plenums and barriers, described in the *Company's* application, this *Approval* and in the supporting documentation referred to herein, to the extent approved by this *Approval*.

35. "*O. Reg. 419/05*" means the Ontario Regulation 419/05, Air Pollution – Local Air Quality, as amended.

36. "*Original ESDM Report*" means the Emission Summary and Dispersion Modelling Report which was prepared in accordance with section 26 of *O. Reg. 419/05* and the *Procedure Document* by RWDI Air Inc. and signed by Colin Welburn and dated March 30, 2012 submitted in support of the application, and includes any changes to the report made up to the date of issuance of this *Approval*.

37. "*Performance Limits*" means the performance limits specified in Condition 3.2 of this *Approval* titled Performance Limits.

38. "*Point of Impingement*" has the same meaning as in section 2 of *O. Reg. 419/05*.

39. "*Point of Reception*" means Point of Reception as defined by *Publication NPC-205* and/or *Publication NPC-232*, as applicable.

40. "*Procedure Document*" means *Ministry* guidance document titled "Procedure for Preparing an Emission Summary and Dispersion Modelling Report" dated March 2009, as amended.

41. "*Processes with Significant Environmental Aspects*" means the *Equipment* which, during regular operation, would discharge a contaminant or contaminants into the air at an amount which is not considered as negligible in accordance with section 26(1)4 of *O. Reg. 419/05* and the *Procedure Document*.

42. "*Publication NPC-205*" means the *Ministry* Publication NPC-205, "Sound Level Limits for Stationary Sources in Class 1 & 2 Areas (Urban)", October, 1995, as amended.

43. "*Publication NPC-207*" means the *Ministry* draft technical publication "Impulse Vibration in Residential Buildings", November 1983, supplementing the Model Municipal Noise Control By-Law, Final Report, published by the *Ministry*, August 1978, as amended.

44. "*Publication NPC-232*" means the *Ministry* Publication NPC-232, "Sound Level Limits for Stationary Sources in Class 3 Areas (Rural)", October, 1995, as amended.

45. "*Publication NPC-233*" means the *Ministry* Publication NPC-233, "Information to be Submitted for Approval of Stationary Sources of Sound", October, 1995, as amended. "*Point of Reception*" means Point of Reception as defined by *Publication NPC-205* and/or *Publication NPC-232*, as applicable.

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

Schedule A - Supporting Documentation;

Schedule B - Procedure for Source Testing; Schedule C - Source Testing – Targeted Sources and Test Contaminants;

Schedule D - Canada-wide Standard for Dioxins and Furans; and Schedule E - Noise Abatement Action Plan.

47. "*Source Testing*" means sampling and testing to measure emissions resulting from operating the Equipment under conditions which yield the worst case emissions within the approved operating range of the Equipment which satisfies paragraph 1 of subsection 11(1) of *O.Reg. 419/05*.

48. "*Source Testing Code*" means the Source Testing Code, Version 3, Report No. PIBs #131e03, dated June 2010, prepared by the *Ministry*, as amended.

49. "*Targeted Sources*" means the sources listed in Schedule "C".

50. "*Test Contaminants*" means the contaminants listed in Schedule "C".

51. "*Toxicologist*" means a qualified professional currently active in the field of risk assessment and toxicology that has a combination of formal university education, training and experience necessary to assess contaminants.

52. "*Written Summary Form*" means the electronic questionnaire form, available on the *Ministry* website, and supporting documentation, that documents the activities undertaken at the *Facility* in the previous calendar year that must be submitted annually to the *Ministry* as required by the section of this *Approval* titled Reporting Requirements.

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. GENERAL

1.1 Except as otherwise provided by this *Approval*, the *Facility* shall be designed, developed, built, operated and maintained in accordance with the terms and conditions of this *Approval* and in accordance with the following *Schedules* attached hereto:

Schedule A - Supporting Documentation

Schedule B - Procedure for Source Testing;

Schedule C - Source Testing – Targeted Sources and Test Contaminants;

Schedule D - Canada-wide Standard for Dioxins and Furans; and Schedule E - Noise Abatement Action Plan.

2. LIMITED OPERATIONAL FLEXIBILITY

2.1 Pursuant to section 20.6(1) of the *EPA* and subject to Conditions 2.2 and 2.3 of this *Approval*, future construction, alterations, extensions or replacements are approved in this *Approval* if the future construction, alterations, extensions or replacements are *Modifications* to the *Facility* that:

(a) are within the scope of the operations of the *Facility* as described in the *Description Section* of this *Approval*;

(b) do not result in an increase of the *Facility Production Limit* above the level specified in the *Description Section* of this *Approval*; and

(c) result in compliance with the *Performance Limits*.

2.2 Condition 2.1 does not apply to:

(a) the addition of any new *Equipment with Specific Operational Limits* or to the *Modification* of any existing *Equipment with Specific Operational Limits* at the *Facility*; or

(b) *Modifications* to the *Facility* that would be subject to the *Environmental Assessment Act*.

2.3 Condition 2.1 of this *Approval* shall expire ten (10) years from the date of this *Approval*, unless this *Approval* is revoked prior to the expiry date. The *Company* may apply for renewal of Condition 2.1 of this *Approval* by including an *ESDM Report* and an *Acoustic Assessment Report* that describes the *Facility* as of the date of the renewal application.

3. REQUEST FOR MAXIMUM CONCENTRATION LEVEL ASSESSMENT AND PERFORMANCE LIMITS

3.1 REQUEST FOR MAXIMUM CONCENTRATION LEVEL ASSESSMENT

3.1.1 If the *Company* proposes to make a *Modification* to the *Facility*, the *Company* shall determine if the proposed *Modification* will result in:

(a) a discharge of a *Compound of Concern* that was not previously discharged; or

(b) an increase in the concentration at a *Point of Impingement* of a *Compound of Concern*.

3.1.2 If a proposed *Modification* mentioned in Condition 3.1.1 will result in the discharge of a *Compound of Concern* that was not previously discharged, the *Company* shall submit a *Maximum Concentration Level Assessment* to the *Director* for review by the *Air Standards Manager* in the following circumstances:

(a) The *Compound of Concern* does not have a *Ministry Point of Impingement Limit* or a *Jurisdictional Screening Level*.

(b) The *Compound of Concern* does not have a *Ministry Point of Impingement Limit* and the concentration at a *Point of Impingement* will exceed the *Jurisdictional Screening Level*.

(c) Prior to the proposed *Modification*, a contaminant was discharged in a negligible amount and the proposed *Modification* will result in the discharge of the contaminant being considered a *Compound of Concern* and the *Compound of Concern* does not have a *Ministry Point of Impingement Limit* or a *Jurisdictional Screening Level*.

(d) Prior to the proposed *Modification*, a contaminant was discharged in a negligible amount and the proposed *Modification* will result in the discharge of the contaminant being considered a *Compound of Concern*. Additionally, the *Compound of Concern* does not have a *Ministry Point of Impingement Limit* and the concentration at a *Point of Impingement* will exceed the *Jurisdictional Screening Level*.

3.1.3 If a proposed *Modification* mentioned in Condition 3.1.1 will result in an increase in the concentration at a *Point of Impingement* of a *Compound of Concern*, the *Company* shall submit a *Maximum Concentration Level Assessment* to the *Director* for review by the *Air Standards Manager* in the following circumstances:

(a) The *Compound of Concern* does not have a *Ministry Point of Impingement Limit* or a *Jurisdictional*

Screening Level and the concentration at a *Point of Impingement* will exceed the *Acceptable Maximum Ground Level Concentration*.

(b) The *Compound of Concern* does not have a *Ministry Point of Impingement Limit* or a *Jurisdictional Screening Level* and the concentration at a *Point of Impingement* will exceed the most recently accepted *Maximum Concentration Level Assessment* submitted under Condition 3.1.2 or this Condition.

(c) The *Compound of Concern* does not have a *Ministry Point of Impingement Limit* and the concentration at a *Point of Impingement* will exceed the *Jurisdictional Screening Level* and the *Acceptable Maximum Ground Level Concentration*.

(d) The *Compound of Concern* does not have a *Ministry Point of Impingement Limit* and the concentration at a *Point of Impingement* will exceed the *Jurisdictional Screening Level* and the most recently accepted *Maximum Concentration Level Assessment* submitted under Condition 3.1.2 or this Condition.

(e) The *Compound of Concern* does not have a *Ministry Point of Impingement Limit*, *Acceptable Maximum Ground Level Concentration* or a *Maximum Concentration Level Assessment* and the concentration at a *Point of Impingement* will exceed the *Jurisdictional Screening Level*.

3.1.4 Subject to the Operational Flexibility set out in Condition 2 of this *Approval*, the *Company* may make the *Modification* if the submission of a *Maximum Concentration Level Assessment* under Condition 3.1.2 or 3.1.3 is not required.

3.1.5 A *Company* that is required to submit an assessment under Condition 3.1.2 or 3.1.3 shall submit the assessment at least thirty (30) days before the proposed *Modification* occurs.

3.1.6 The *Ministry* shall provide to the *Company* written confirmation of the receipt of the assessment under Condition 3.1.2 or 3.1.3.

3.1.7 If an assessment is submitted under Condition 3.1.2 or 3.1.3, the *Company* shall not modify the *Facility* unless the *Ministry* accepts the assessment.

3.1.8 If the *Ministry* notifies the *Company* that it does not accept the assessment submitted under Condition 3.1.2 or 3.1.3, the *Company* shall:

(a) revise and resubmit the assessment; or

(b) notify the *Ministry* that the *Company* will not be modifying the *Facility*.

3.1.9 The re-submission under Condition 3.1.8 (a) is considered by the *Ministry* as a new submission.

3.2. PERFORMANCE LIMITS

3.2.1 Subject to Condition 3.2.2, the *Company* shall, at all times, ensure that all *Equipment* that is a source of a *Compound of Concern* is operated to comply with the following *Performance Limits*:

(a) for a *Compound of Concern* that has a *Ministry Point of Impingement Limit*, the maximum concentration of that *Compound of Concern* at any *Point of Impingement* shall not exceed the corresponding *Ministry Point of Impingement Limit*;

(b) for a *Compound of Concern* that has an *Acceptable Maximum Ground Level Concentration* and no *Maximum Concentration Level Assessment*, the maximum concentration of that *Compound of Concern* at any *Point of Impingement* shall not exceed the corresponding *Acceptable Maximum Ground Level Concentration*; and

(c) for a *Compound of Concern* that has a *Maximum Concentration Level Assessment*, the maximum concentration of that *Compound of Concern* at any *Point of Impingement* shall not exceed the most

recently accepted corresponding *Maximum Concentration Level Assessment*.

3.2.2 If the *Company* has modified the *Facility* and was not required to submit a *Maximum Concentration Level Assessment* with respect to a *Compound of Concern* under Condition 3.1.2 or 3.1.3, the *Company* shall, at all times, ensure that all *Equipment* that is a source of the *Compound of Concern* is operated such that the maximum concentration of the *Compound of Concern* shall not exceed the concentration listed for the *Compound of Concern* in the most recent version of the *ESDM Report*.

3.2.3 Following completion of the *Noise Abatement Action Plan* described in *Schedule "F"*, the *Company* shall, at all times, ensure that the noise emissions from the *Facility* comply with the limits set out in *Ministry Publication NPC-205*.

3.2.4 The *Company* shall, at all times, ensure that the vibration emissions from the *Facility* comply with the limits set out in *Ministry Publication NPC-207*.

3.2.5 The *Company* shall ensure and verify through *Source Testing* that the *Electric Arc Furnace* is operated such that the toxicity equivalent concentration of dioxins and furans in the flue gases of the *Electric Arc Furnace Baghouse Exhaust System* does not exceed 100 picograms per dry cubic metre at the operating oxygen level at a reference temperature of 25 degrees Celsius and a reference pressure of 101.3 kilopascals. The toxicity equivalent concentration of dioxins and furans shall be calculated in accordance with the International Scheme set out in *Schedule "D"*, or the latest calculation method established by the *Ministry*, whichever comes later.

4 . DOCUMENTATION REQUIREMENTS

4.1 The *Company* shall, at all times, maintain digital or hard copy documentation that describes the current operations of the *Facility*, including but not limited to:

- (a) an *ESDM Report* that demonstrates compliance with the *Performance Limits* for the *Facility*;
- (b) an *Acoustic Assessment Report* that demonstrates compliance with the *Performance Limits* for the *Facility*;
- (c) an up-to-date *Log* that describes each *Modification* to the *Facility*; and
- (d) a record of the changes to the *ESDM Report* and the *Acoustic Assessment Report* that documents how each *Modification* is in compliance with the *Performance Limits*.

4.2 The *Company* shall, during regular business hours, make the current *Emission Summary Table* and *Acoustic Assessment Summary Table* available for inspection at the *Facility* by any interested member of the public.

4.3 Subject to Condition 4.5, the *Company* shall prepare and complete no later than April 15 of each year documentation that describes the activities undertaken at the *Facility* in the previous calendar year, including but not limited to:

- (a) a list of all *Compounds of Concern* for which a *Maximum Concentration Level Assessment* was submitted to the *Director* for review by the *Air Standards Manager* pursuant to Condition 3.1.2 or 3.1.3 of this *Approval*;
- (b) if the *Company* has modified the *Facility* and was not required to submit a *Maximum Concentration Level Assessment* with respect to a *Compound of Concern* under Condition 3.1.2 or 3.1.3, a list and concentration level of all such *Compounds of Concern*;
- (c) a review of any changes to *Ministry Point of Impingement Limits* that affect any *Compounds of Concern* emitted from the *Facility*; and

(d) a table of the changes in the emission rate of any *Compound of Concern* and the resultant increase or decrease in the *Point of Impingement* concentration reported in the *ESDM Report*.

4.4 Subject to Condition 4.5, the *Company* shall, at all times, maintain the documentation described in Condition 4.3.

4.5 Conditions 4.3 and 4.4 do not apply if Condition 2.1 has expired.

4.6 The *Company* shall, within three (3) months after the expiry of Condition 2.1 of this *Approval*, update the *ESDM Report* and the *Acoustic Assessment Report* such that they describe the *Facility* as it was at the time that Condition 2.1 of this *Approval* expired.

5. REPORTING REQUIREMENTS

5.1 Subject to Condition 5.2, the *Company* shall provide the *Ministry* and the *Director* no later than April 15 of each year, a *Written Summary Form* that shall include the following:

(a) a declaration of whether the *Facility* was in compliance with section 9 of the *EPA, O.Reg. 419/05* and the conditions of this *Approval*;

(b) a summary of each *Modification* that took place in the previous calendar year that resulted in a change in the previously calculated concentration at the *Point of Impingement* for any *Compound of Concern* or resulted in a change in the sound levels reported in the *Acoustic Assessment Summary Table* at any *Point of Reception*.

5.2 Condition 5.1 does not apply if Condition 2.1 has expired.

6. OPERATION AND MAINTENANCE

6.1 The *Company* shall prepare and implement, not later than six (6) months from the date of this *Approval*, operating procedures and maintenance programs for all *Processes with Significant Environmental Aspects*, which shall specify as a minimum:

(a) frequency of inspections and scheduled preventative maintenance;

(b) procedures to prevent upset conditions;

(c) procedures to minimize all fugitive emissions;

(d) procedures to prevent and/or minimize odorous emissions;

(e) procedures to prevent and/or minimize noise emissions; and

(f) procedures for record keeping activities relating to the operation and maintenance programs; and

(g) routine operating and maintenance procedures in accordance with good engineering practices and as recommended by *Equipment* suppliers, including those for the Baghouses and *Baghouse leak detection systems* installed at the *Facility*.

6.2 The *Company* shall ensure that all *Processes with Significant Environmental Aspects* are operated and maintained at all times in accordance with this *Approval*, the operating procedures and maintenance programs.

7. COMPLAINTS RECORDING PROCEDURE

7.1 If at any time, the *Company* receives any environmental complaints from the public regarding the operation of the *Equipment* approved by this *Approval*, the *Company* shall respond to these complaints according to the following procedure:

(a) the *Company* shall inform the local Ministry district office of the complaint as soon as reasonably possible and shall record and number each complaint, either electronically or in a log book, and shall include the following information: the time and date of the complaint and incident to which the complaint relates, the nature of the complaint, wind direction at the time and date of the incident to which the complaint relates and, if known, the address of the complainant;

(b) the *Company*, upon notification of a complaint, shall initiate appropriate steps to determine all possible causes of the complaint, and shall proceed to take the necessary actions to appropriately deal with the cause of the subject matter of the complaint; and

(c) the *Company* shall complete and retain a digital or hard copy on site, a report written within two (2) weeks of the complaint date, listing the actions taken to appropriately deal with the cause of the subject matter of the complaint and any recommendations for remedial measures, and managerial or operational changes to reasonably avoid the recurrence of similar incidents.

8. RECORD KEEPING REQUIREMENTS

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

8.2 The *Company* shall retain, in digital or hard copy for a minimum of five (5) years from the date of their creation, except as noted below, all reports, records and information described in this *Approval* and shall include but not be limited to:

(a) If the *Company* has updated the *ESDM Report* in order to comply with Condition 4.1(a) of this *Approval*, a copy of each new version of the *ESDM Report*;

(b) If the *Company* has updated the *Acoustic Assessment Report*, in order to comply with Condition 4.1(b) of this *Approval*, a copy of each new version of the *Acoustic Assessment Report*;

(c) supporting information used in the emission rate calculations performed in the *ESDM Reports* and *Acoustic Assessment Reports* to document compliance with the *Performance Limits* (superseded information must be retained for a period of three (3) years after *Modification*);

(d) the *Log* that describes each *Modification* to the *Facility*;

(e) all documentation prepared in accordance with Condition 4.3 of this *Approval*;

(f) copies of any *Written Summary Forms* provided to the *Ministry* under Condition 5.1 of this *Approval*;

(g) the operating procedures and maintenance programs, including records on the maintenance, repair and inspection of the *Equipment* related to all *Processes with Significant Environmental Aspects*; and

(h) the complaints recording procedure, including records related to all environmental complaints made by the public as required by Condition 7.1 of this *Approval*.

(i) records related to *Source Testing* events as required by the section titled "*Source Testing*" of this *Approval*.

(j) records related to the prevention and control measures implemented as required by the section titled "*Fugitive Dust Control*" of this *Approval*

9. REVOCATION OF PREVIOUS APPROVALS

9.1 This *Approval* replaces and revokes all Certificates of Approval (Air) issued under section 9

EPA and Environmental Compliance Approvals issued under Part II.1 *EPA* to the *Facility* in regards to the activities mentioned in subsection 9(1) of the *EPA* and dated prior to the date of this *Approval*.

10. SOURCE TESTING

10.1 The *Company* shall perform *Source Testing* in accordance with the procedure in Schedule "B" to determine the rate of emission of the *Test Contaminants* from the *Targeted Sources* at the frequencies listed in Schedule "C".

10.2 The *Company* shall perform *Source Testing* to monitor the emissions and operation of the *Electric Arc Furnace Baghouse Exhaust System* as follows:

(a) The *Company* shall perform one annual *Source Testing* to determine the concentrations of dioxins and furans in the flue gases of the *Electric Arc Furnace Baghouse Exhaust System* every calendar year. After the *Company* has demonstrated, by means of five (5) consecutive annual *Source Testings* in the flue gases of *Electric Arc Furnace Baghouse Exhaust System* for dioxins and furans, with all results below the Level of Quantification for dioxins and furans (LoQ as defined in the Canada-wide Standard as 32 pgI_{TEQ}/Rm³), the *Company* may change the schedule for *Source Testing* on the *Electric Arc Furnace Baghouse Exhaust System* for dioxins and furans to once every two calendar years so long as all subsequent test results remain below the LoQ.

(b) For every *Source Testing* on the *Electric Arc Furnace Baghouse Exhaust System*, the *Company* shall submit, not later than four (4) weeks prior to the date of *Source Testing*, to the *Manager* a test protocol, including the *Pre-Test Information* for the *Source Testing* required by the *Source Testing Code*. The *Company* shall finalize the test protocol in consultation with the *Manager*.

(c) For every *Source Testing* on the *Electric Arc Furnace Baghouse Exhaust System*, the *Company* shall not commence the *Source Testing* until the *Manager* has accepted the test protocol.

(d) For every *Source Testing* on the *Electric Arc Furnace Baghouse Exhaust System*, the *Company* shall notify the *District Manager* and the *Manager* in writing of the location, date and time of any impending *Source Testing* on the *Electric Arc Furnace Baghouse Exhaust System* required by this *Approval*, at least fifteen (15) days prior to the *Source Testing*.

(e) For every *Source Testing* on the *Electric Arc Furnace Baghouse Exhaust System*, the *Company* shall submit a report on the *Source Testing* on the *Electric Arc Furnace Baghouse Exhaust System* to the *District Manager* and the *Manager* not later than ninety (90) calendar days after completing the *Source Testing* on the *Electric Arc Furnace Baghouse Exhaust System*. The report shall be in the format described in the *Source Testing Code*, and shall also include, but not be limited to:

- (i) an executive summary;
- (ii) dates when *Source Testing* on the *Electric Arc Furnace* was carried out;
- (iii) process description, records of production rate and heat duration during the *Source Testing*;
- (iv) records of operating conditions, including but not limited to:

(a) records of all continuous emission monitoring systems, including temperature and pressure sensors, during *Source Testing* on the *Electric Arc Furnace Baghouse Exhaust*

System ;

(b) liquid and/or reagent and gas flow rates for all components of the air pollution control system(s);

(c) any other records that may affect the evaluation of the *Source Testing* report;

(v) procedures followed during the *Source Testing* on the *Electric Arc Furnace Baghouse Exhaust System* and any deviation from the proposed test protocol and the reasons therefore;

(vi) the results of *Source Testing* on the *Electric Arc Furnace Baghouse Exhaust System* indicating the emission concentrations of dioxins and furans in the flue gases of the *Electric Arc Furnace Baghouse Exhaust System* ;

(vii) a summary table that compares the *Source Testing* results, the monitoring data and the records of operating conditions during the *Source Testing* on *Electric Arc Furnace Baghouse Exhaust System* .

(f) For every *Source Testing* where the *Source Testing* does not meet the following requirements the *Company* shall re-test in accordance with Conditions No. 10.2(a) to 10.2(e)

(i) the *Source Testing Code* or the test protocol was not followed; or

(ii) the *Company* did not notify the *District Manager* and the *Manager* of the *Source Testing* ; or

(iii) the *Company* failed to provide a complete report on the *Source Testing*

(g) If the *Source Testing* results indicate the emission estimates are higher than the original emission estimates described in the *Company* 's application and the *ESDM Report* , the *Company* shall update their *ESDM Report* in accordance with Section 26 of *O. Reg. 419/05* with the emission estimates from the source testing report and make these records available for review by staff of the *Ministry* upon request. The updated *Emission Summary Table* from the updated *ESDM Report* shall be submitted with the report on the *Source Testing* .

10.3 The *Company* shall perform *Source Testing* in accordance with the procedure in Schedule "B" to determine the rate of contaminants as outlined in Schedule "E" from the operation of the *Electric Arc Furnace Baghouse Exhaust System* to demonstrate compliance with Regulation 419 requirements. Refer to Conditions Nos. 10. 2 (b) to (g) as outlined above which shall apply.

11. FUGITIVE DUST CONTROL

11.1 The *Company* shall develop in consultation with the *District Manager* and acceptable to the *Director* , a *Best Management Practices Plan* for the control of fugitive dust emissions. This *Best Management Practices Plan* shall include, but not be limited to:

(a) identification of the main sources of fugitive dust emissions such as:

(i) on-site traffic;

- (ii) paved roads/areas;
- (iii) unpaved roads/areas;
- (iv) material stock piles;
- (v) loading/unloading areas and loading/unloading techniques;
- (vi) material spills; and
- (vii) material conveyance systems.

(b) potential causes for high dust emissions resulting from these sources;

(c) preventative and control measures in place or under development to minimize the likelihood of high dust emissions from the sources of fugitive dust emissions identified above. Details of the preventative and control measures shall include:

- (i) a description of the control equipment to be installed;
- (ii) a description of the preventative procedures to be implemented; and/or
- (iii) the frequency of occurrence of periodic preventative activities, including material application rates, as applicable.

(d) an implementation schedule for the *Best Management Practices Plan* , including training of facility personnel;

(e) inspection and maintenance procedures as applicable, and monitoring initiatives to ensure effective implementation of the preventative and control measures; and

(f) a list of all *Ministry* comments received, if any, on the development of the *Best Management Practices Plan* , and a description of how each *Ministry* comment was addressed in the *Best Management Practices Plan*.

11.2 The *Company* shall submit the *Best Management Practices Plan* to the *Director* and the *District Manager* not later than three (3) months after the date of this *Approval* .

(a) The *Director* may not accept the *Best Management Practices Plan* if the minimum requirements described in Condition No. 11.1 were not included in the *Best Management Practices Plan* ; and

(b) If the *Best Management Practices Plan* is not accepted by the *Director* , the *Company* shall submit a *Best Management Practices Plan* acceptable to the *Director* not later than 90 days after the date of the review of the *Best Management Practices Plan* by the *District Manager*.

11.3 Upon acceptance of the *Best Management Practices Plan* by the *Director* , the *Company* shall immediately implement the *Best Management Practices Plan* for the control of fugitive dust emissions to provide effective dust suppression measures to any potential sources of fugitive dust emissions resulting from the operation of the *Facility* .

Documentation Requirements - *Best Management Practices Plan*

11.4 The *Company* shall record and retain such records, each time a specific preventative and control measure described in the *Best Management Practices Plan* is implemented. The *Company* shall record, as a minimum:

(a) the date when each emission control measure is installed, including a description of the control measure;

(b) the date when each new preventative measure or operating procedure to minimize emissions is

implemented, including a description of the preventative measure or operating procedure; and

(c) the date, time of commencement, and time of completion of each periodic activity conducted to minimize emissions, including a description of the preventative measure/procedure and the name of the individual performing the periodic activity.

12. AMBIENT AIR MONITORING

12.1 The *Company* shall carry out and maintain an ambient air monitoring program in accordance with the *Air Quality Monitoring Manual* at locations agreed to by the *District Manager* and the *Company*, for the measurement of contaminants as outlined and or an alternate list acceptable to the *District Manager* by methods and equipment accepted by the *District Manager*.

List of contaminants to be included in the Ambient Air Monitoring Program

Total suspended particulate matter	Calcium	Magnesium
Aluminum	Chromium	Manganese
Arsenic	Cobalt	Nickel
Beryllium	Copper	Tin
Cadmium	Iron	Zinc
	Lead	

12.2 The *Company* shall submit a detailed plan of the ambient air monitoring program in accordance with the *Air Quality Monitoring Manual* to the *District Manager* within a time period acceptable to the *District Manager*. The *Company* shall finalize the monitoring program in consultation with the *District Manager*.

12.3 The *Company* shall implement the ambient air monitoring program within a time period acceptable to the *District Manager*, after the program has been accepted by the *District Manager*.

12.4 The *Company* shall submit the ambient air monitoring data and summary reports on the ambient air quality monitoring program as per the requirements of the *Air Quality Monitoring Manual* to the *District Manager*, or on an alternative frequency acceptable to the *District Manager*. The *Company* shall make available a copy of the ambient air monitoring result for inspection at the *Facility* by any interested member of the public.

12.5 The *Company* may revise the scope and duration of the ambient air monitoring program or discontinue the program with the written agreement from the *District Manager*.

13. NOISE ABATEMENT ACTION PLAN

13.1 The *Company* shall implement the *Noise Abatement Action Plan* described in *Schedule "F"*.

13.2 The *Company* shall ensure that the *Noise Abatement Action Plan* shall achieve compliance of the noise emissions from the *Facility* with the limits set out in *Ministry Publication NPC-205*.

13.3 The *Company* shall, not later than the date(s) specified in the *Noise Abatement Action Plan*, ensure that all reports on the progress of the *Noise Abatement Action Plan* are submitted to the *District Manager* and the *Director*.

14. ACOUSTIC AUDIT

14.1 The *Company* shall carry out *Acoustic Audit* measurements on the actual noise emissions due to the operation of the *Facility*, following the completion of the *Noise Abatement Action Plan*. The *Company*:

(a) shall carry out *Acoustic Audit* measurements in accordance with the procedures in *Publication NPC-103*;

(b) shall submit an *Acoustic Audit Report* on the results of the *Acoustic Audit* , prepared by an *Independent Acoustical Consultant* , in accordance with the requirements of *Publication NPC-233*, to the *District Manager* and the *Director*, not later than three (3) months after the completion of the *Noise Abatement Action Plan*.

14.2 The *Director*:

(a) may not accept the results of the *Acoustic Audit* if the requirements of *Publication NPC-233* were not followed;

(b) may require the *Company* to repeat the *Acoustic Audit* if the results of the *Acoustic Audit* are found unacceptable to the *Director*.

SCHEDULE "A"

Supporting Documentation

(a) Application for Approval (Air & Noise), dated March 19, 2012 signed by Joe Olenick, General Manager and submitted by the *Company*;

(b) Emission Summary and Dispersion Modelling Report, prepared by RWDI Air Inc. and signed by Colin Welburn and dated March 30, 2012;

(c) Acoustic Assessment Report dated May 7, 2012 and signed by Galen Wong and Joe Tomaselli, Golder Associates Ltd.,

(d) Revised Ivaco Rolling Mills 2004 L.P. Noise Abatement Action Plan dated November 2, 2012 and signed by Galen Wong and Joe Tomaselli, Golder Associates Ltd.

(e) The letters (e-mails) November 9 and 21, 2012 all provided by Galen Wong and Joe Tomaselli, Golder Associates Ltd.

(f) All supporting information associated with the application as well as the communication provided by the consultant.

SCHEDULE "B"

Procedure for Source Testing

1. The *Company* shall submit, not later than three (3) months from the date of this Approval, to the *Manager* a *Pre-Test Plan* for the *Source Testing* of the *Targeted Sources* in Schedule "C". The *Company* shall finalize the *Pre-Test Plan* in consultation with the *Manager*.

2. The *Company* shall not commence the *Source Testing* required under this *Approval* until the *Manager* has approved the *Pre-Test Plan* .

3. The *Company* shall complete the *Source Testing* not later than three (3) months after the *Manager* has approved the *Pre-Test Plan* or within a period as directed or agreed to in writing by the *Manager* and the *District Manager* .

4. The *Company* shall notify the *Manager*, the *District Manager* and the *Director* in writing of the location, date and time of any impending *Source Testing* required by this *Approval*, at least fifteen (15) days prior to the *Source Testing*.

5. The *Company* shall submit a report (hardcopy and electronic format) on the *Source Testing* to the *Manager*, the *District Manager* and the *Director* not later than three (3) months after completing the *Source Testing*. The report shall be in the format described in the *Source Testing Code*, and shall also include, but not be limited to:

(1) an executive summary;

(2) an identification of the applicable North American Industry Classification System Code (NAICS) for the facility;

(3) records of operating conditions at the time of *Source Testing*;

(4) results of *Source Testing*, including the emission rate, emission concentration and relevant emission factor of the *Test Contaminants* from the *Targeted Sources* listed in *Schedule C*;

(5) a tabular comparison of *Source Testing* results for the *Targeted Sources* and *Test Contaminants* listed in *Schedule C* to original emission estimates described in the *Company's* application and the *ESDM Report*.

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

(1) the *Source Testing Code* or the requirements of the *Manager* were not followed;

(2) the *Company* did not notify the *District Manager*, the *Manager* and the *Director* of the *Source Testing*; or

(3) the *Company* failed to provide a complete report on the *Source Testing*.

SCHEDULE "B"(Continued)

Procedure for Source Testing

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

8. If the *Source Testing* results indicate the emission estimates are higher than the original emission estimates described in the *Company's* application and the *ESDM Report*, the *Company* shall update their *ESDM Report* in accordance with Section 26 of *O. Reg. 419/05* with the emission estimates from the source testing report and make these records available for review by staff of the *Ministry* upon request. The updated *Emission Summary Table* from the updated *ESDM Report* shall be submitted with the report on the *Source Testing*.

SCHEDULE "C"

Source Testing - Targeted Source and Test Contaminants

Targeted Source

Stack ID	Description	Frequency of Source Testing
EAF	Electric Arc Furnace Baghouse Exhaust System	One Time

Test contaminants for Sources EAF

1. 7440-47-3 Total Chromium
2. 7439-92-1 Lead
3. 7439-96-5 Manganese and manganese compounds
4. 7440-02-0 Nickel and nickel compounds
5. Total Suspended Particulate Matter

SCHEDULE "D"

Canada-wide Standard for Dioxins and Furans

International toxicity equivalency factors (I-TEFs) are applied to 17 dioxin and furan isomers of concern to convert them into 2,3,7,8-TCDD (tetrachlorodibenzo-p-dioxin) toxicity equivalents. The conversion involves multiplying the concentration of the isomer by the appropriate I-TEF to yield the TEQ for this isomer. Summing the individual TEQ values for each of the isomers of concern provides the total toxicity equivalent level for the sample mixture.

A table listing the 17 isomers of concern and their I-TEFs can be found in the *Ministry*'s publication entitled: Environmental Information - Dioxins & Furans; PIBS 681b, revised 08/91 or in the example provided below.

Dioxin/Furan Isomers of Concern	International Toxicity Equivalency Factors (I-TEF's)
2,3,7,8-Tetrachlorodibenzo-p-dioxin	1.0
1,2,3,7,8-Pentachlorodibenzo-p-dioxin	0.5
1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin	0.1
1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin	0.1
1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin	0.1
1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin	0.01
1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin	0.001
2,3,7,8-Tetrachlorodibenzofuran	0.1
2,3,4,7,8-Pentachlorodibenzofuran	0.5
1,2,3,7,8-Pentachlorodibenzofuran	0.05
1,2,3,4,7,8-Hexachlorodibenzofuran	0.1
1,2,3,6,7,8-Hexachlorodibenzofuran	0.1
1,2,3,7,8,9-Hexachlorodibenzofuran	0.1
2,3,4,6,7,8-Hexachlorodibenzofuran	0.1

1,2,3,4,6,7,8-Heptachlorodibenzofuran	0.01
1,2,3,4,7,8,9-Heptachlorodibenzofuran	0.01
1,2,3,4,6,7,8,9-Octachlorodibenzofuran	0.001

The I-TEF scheme is intended to be used with isomer specific analytical results.

The emission limits on dioxins and furans and the annual stack testing requirement for these contaminants are required in accordance with the endorsement of the following standards by the Canadian Council of Ministers of the Environment Council of Ministers:

Canada-wide Standard for Dioxins and Furans - Emissions from Steel Manufacturing Electric Arc Furnaces, March, 2003.

SCHEDULE "E"

The air standard for dioxins, furans, and dioxin-like PCBs requires the calculation of the total toxicity equivalent (TEQ) concentration contributed by all dioxin-like compounds in the mixture. This is a legal requirement set out in s.1(2.0.2) and Schedule 8 of Regulation 419. Table below lists 29 specific dioxins, furans, and dioxin-like PCBs (along with the corresponding WHO 2005 toxic equivalency factors (TEFs)) to which the standards would apply. The following formula should be used in order to meet the requirement in the regulation of calculating the total concentration of dioxins, furans and dioxin-like PCBs:

$A = \Sigma(B \times C)$, where,

A = the amount (or concentration) of total dioxins, furans and dioxin-like PCBs in TEQ

B = the amount (or concentration) of each dioxin-like compound listed in table below (**Table for 29 dioxins, furans and dioxin-like PCBs**)

C = the corresponding TEF for each dioxin-like compound listed in the table below (**Table for 29 dioxins, furans and dioxin-like PCBs**)

For the purpose of calculating the total TEQ concentration for a mixture of dioxin-like compounds, a value of half the minimum detection limit (MDL) should be substituted for concentrations less than the MDL.

Table for 29 dioxins, furans and dioxin-like PCBs

No.	Dioxins, Furans and Dioxin-like PCBs	CASRN	WHO 2005 Toxic Equivalency Facotrs (TEFs)
1	2,3,7,8-Tetrachlorodibenzo-p-dioxin [2,3,7,8-TCDD]	1746-01-6	1
2	1,2,3,7,8-Pentachlorodibenzo-p-dioxin [1,2,3,7,8-PeCDD]	40321-76-4	1
3	1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin [1,2,3,4,7,8-HxCDD]	39227-28-6	0.1
4	1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin [1,2,3,6,7,8-	57653-85-7	0.1

	HxCDD]		
5	1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin [1,2,3,7,8,9-HxCDD]	19408-74-3	0.1
6	1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin [1,2,3,4,6,7,8-HpCDD]	35822-46-9	0.01
7	1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin [1,2,3,4,6,7,8,9-OCDD]	3268-87-9	0.0003
8	2,3,7,8-Tetrachlorodibenzofuran [2,3,7,8-TCDF]	51207-31-9	0.1
9	1,2,3,7,8-Pentachlorodibenzofuran [1,2,3,7,8-PeCDF]	57117-41-6	0.03
10	2,3,4,7,8-Pentachlorodibenzofuran [2,3,4,7,8-PeCDF]	57117-31-4	0.3
11	1,2,3,4,7,8-Hexachlorodibenzofuran [1,2,3,4,7,8-HxCDF]	70648-26-9	0.1
12	1,2,3,6,7,8-Hexachlorodibenzofuran [1,2,3,6,7,8-HxCDF]	57117-44-9	0.1
13	1,2,3,7,8,9-Hexachlorodibenzofuran [1,2,3,7,8,9-HxCDF]	72918-21-9	0.1
14	2,3,4,6,7,8-Hexachlorodibenzofuran [2,3,4,6,7,8-HxCDF]	60851-34-5	0.1
16	1,2,3,4,7,8,9-Heptachlorodibenzofuran [1,2,3,4,7,8,9-HpCDF]	55673-89-7	0.01
17	1,2,3,4,6,7,8,9-Octachlorodibenzofuran [1,2,3,4,6,7,8,9-OCDF]	39001-02-0	0.0003
18	3,3',4,4'-Tetrachlorobiphenyl [3,3',4,4'-tetraCB (PCB 77)]	32598-13-3	0.0001
19	3,4,4',5-Tetrachlorobiphenyl [3,4,4',5-tetraCB (PCB 81)]	70362-50-4	0.0003
20	3,3',4,4',5-Pentachlorobiphenyl	57465-28-8	0.1

	(PCB 126) [3,3',4,4',5-pentaCB (PCB 126)]		
21	3,3',4,4',5,5'-Hexachlorobiphenyl [3,3',4,4',5,5'-hexaCB (PCB 169)]	32774-16-6	0.03
22	2,3,3',4,4'-Pentachlorobiphenyl [2,3,3',4,4'-pentaCB (PCB 105)]	32598-14-4	0.00003
23	2,3,4,4',5-Pentachlorobiphenyl [2,3,4,4',5-pentaCB (PCB 114)]	74472-37-0	0.00003
24	2,3',4,4',5-Pentachlorobiphenyl [2,3',4,4',5-pentaCB (PCB 118)]	31508-00-6	0.00003
25	2',3,4,4',5-Pentachlorobiphenyl [2',3,4,4',5-pentaCB (PCB 123)]	65510-44-3	0.00003
26	2,3,3',4,4',5-Hexachlorobiphenyl [2,3,3',4,4',5-hexaCB (PCB 156)]	38380-08-4	0.00003
25	2,3,3',4,4',5'-Hexachlorobiphenyl [2,3,3',4,4',5'-hexaCB (PCB 157)]	69782-90-7	0.00003
28	2,3',4,4',5,5'-Hexachlorobiphenyl [2,3',4,4',5,5'-hexaCB (PCB 167)]	52663-72-6	0.00003
29	2,3,3',4,4',5,5'-Heptachlorobiphenyl [2,3,3',4,4',5,5'-heptaCB (PCB 189)]	39635-31-9	0.00003

SCHEDULE "F"

Noise Abatement Action Plan

The *Noise Abatement Action Plan* shall consist of the *Noise Control Measures* identified as Phase 1, Phase 2 and Phase 3, as outlined in the Revised Ivaco Rolling Mills *Noise Abatement Action Plan* dated November 2, 2012 and signed by Galen Wong and Joe Tomaselli, Golder Associates Ltd. , and implemented according to the following schedule:

- December 31, 2012 – complete Phase 1 *Noise Control Measures*;
- September 30, 2013 – complete Phase 2 *Noise Control Measures*;
- December 31, 2013 – submit an *Acoustic Audit Report*, prepared by an *Acoustical Consultant*, on the results of an *Acoustic Audit* conducted to demonstrate conditions following completion of the Phase 1 and Phase 2 *Noise Control Measures*;
- June 30, 2014 – complete Phase 3 *Noise Control Measures*, representing completion of the *Noise Abatement Action Plan*.

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

GENERAL

1. Condition No. 1 is included to require the *Approval* holder to build, operate and maintain the *Facility* in accordance with the Supporting Documentation in Schedule A considered by the *Director* in issuing this *Approval*.

LIMITED OPERATIONAL FLEXIBILITY, REQUEST FOR *MAXIMUM CONCENTRATION LEVEL ASSESSMENT AND PERFORMANCE LIMITS*

2. Conditions No. 2 and 3 are included to limit and define the *Modifications* permitted by this *Approval*, and to set out the circumstances in which the *Company* shall submit a *Maximum Concentration Level Assessment* prior to making *Modifications*. The holder of the *Approval* is approved for operational flexibility for the *Facility* that is consistent with the description of the operations included with the application up to the *Facility Production Limit*. In return for the operational flexibility, the *Approval* places performance based limits that cannot be exceeded under the terms of this *Approval*. *Approval* holders will still have to obtain other relevant approvals required to operate the *Facility*, including requirements under other environmental legislation such as the *Environmental Assessment Act*.

DOCUMENTATION REQUIREMENTS

3. Condition No. 4 is included to require the *Company* to maintain ongoing documentation that demonstrates compliance with the *Performance Limits* of this *Approval* and allows the *Ministry* to monitor on-going compliance with these *Performance Limits*. The *Company* is required to have an up to date *ESDM Report* and *Acoustic Assessment Report* that describe the *Facility* at all times and make the *Emission Summary Table* and *Acoustic Assessment Summary Table* from these reports available to the public on an ongoing basis in order to maintain public communication with regard to the emissions from the *Facility*.

REPORTING REQUIREMENTS

4. Condition No. 5 is included to require the *Company* to provide a yearly *Written Summary Form* to the *Ministry*, to assist the *Ministry* with the review of the site's compliance with the *EPA*, the regulations and this *Approval*.

OPERATION AND MAINTENANCE

5. Condition No. 6 is included to require the *Company* to properly operate and maintain the *Processes with Significant Environmental Aspects* to minimize the impact to the environment from these processes.

COMPLAINTS RECORDING PROCEDURE

6. Condition No. 7 is included to require the *Company* to respond to any environmental complaints regarding the operation of the *Equipment*, according to a procedure that includes methods for preventing recurrence of similar incidents and a requirement to prepare and retain a written report.

RECORD KEEPING REQUIREMENTS

7. Condition No. 8 is included to require the *Company* to retain all documentation related to this *Approval* and provide access to employees in or agents of the *Ministry*, upon request, so that the *Ministry* can determine if a more detailed review of compliance with the *Performance Limits* is necessary.

REVOCATION OF PREVIOUS APPROVALS

8. Condition No. 9 is included to identify that this *Approval* replaces all Section 9 Certificate(s) of Approval and Part II.1 Approvals in regards to the activities mentioned in subsection 9(1) of the *EPA* and dated prior to the date of this *Approval*.

SOURCE TESTING

9. Condition No. 10 is included to require the *Company* to gather and retain accurate information so that compliance with the *EPA* , *Regulation 419/05* and this *Approval* may be verified.

FUGITIVE DUST CONTROL

10. Condition No. 11 is included to emphasize that the *Equipment* and *Facility* must be maintained and operated in accordance with a procedure that will result in compliance with the *EPA*, *Regulation 419/05* and this *Approval* and to require the *Company* to keep records and to provide information to staff of the *Ministry* so that compliance with the *EPA*, *Regulation 419/05* and this *Approval* can be verified.

AMBIENT AIR MONITORING

11. Condition No. 12 is included to require the *Company* to gather accurate information so that the environmental impact and subsequent compliance with the *EPA* , the *Regulation* and this *Approval* can be verified.

NOISE ABATEMENT ACTION PLAN

12. Condition No. 13 is included to require the *Company* to implement a *Noise Abatement Action Plan* designed to ensure that the noise emissions from the *Facility* will be in compliance with applicable limits set in the *Ministry* 's noise guidelines.

ACOUSTIC AUDIT

13. Condition No. 14 is included to require the *Company* to gather accurate information and submit an *Acoustic Audit Report* in accordance with procedures set in the *Ministry's* noise guidelines, so that the environmental impact and subsequent compliance with the *EPA*, the regulation and this *Approval* can be verified.

Upon issuance of the environmental compliance approval, I hereby revoke Approval No(s). 8-4137-92-936, 9323-5NZPQE, 8-4138-97-006, 8-4011-95-006, 8-4113-95-006, 8-4057-88-006, 8-4074-80-816, 104/4/71-T, 8-4047-91-006 issued on January 12, 1993, June 30, 2003, August 22, 1997, March 17, 1995, August 10, 1995, June 30, 1988, February 24, 1981, January 13, 1975, May 31, 1991

In accordance with Section 139 of the Environmental Protection Act, you may by written Notice served upon me, the Environmental Review Tribunal and in accordance with Section 47 of the Environmental Bill of Rights, 1993 , S.O. 1993, c. 28 (Environmental Bill of Rights), the Environmental Commissioner, within 15 days after receipt of this Notice, require a hearing by the Tribunal. The Environmental Commissioner will place notice of your appeal on the Environmental Registry. Section 142 of the Environmental Protection Act provides that the Notice requiring the hearing shall state:

1. 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;
2. The grounds on which you intend to rely at the hearing in relation to each portion appealed.

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

The Notice should also include:

3. The name of the appellant;
4. The address of the appellant;
5. The environmental compliance approval number;
6. The date of the environmental compliance approval;
7. The name of the Director, and;
8. 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:

The Secretary*		The Environmental		The Director appointed for the
Environmental Review		Commissioner		purposes of Part II.1 of the
Tribunal		1075 Bay Street, Suite		Environmental Protection Act
655 Bay Street, Suite	AND	605	AND	Ministry of the Environment
1500		Toronto, Ontario		2 St. Clair Avenue West, Floor
Toronto, Ontario		M5S 2B1		12A
M5G 1E5				Toronto, Ontario
				M4V 1L5

*** Further information on the Environmental Review Tribunal 's requirements for an appeal can be obtained directly from the Tribunal at: Tel: (416) 212-6349, Fax: (416) 314-4506 or www.ert.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 www.ebr.gov.on.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 25th day of January, 2013

Ian Greason, P.Eng.

Director

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

AK/

c: District Manager, MOE Cornwall

Galen Wong, Golder Associates Ltd.