AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL
NUMBER A620166
Issue Date: August 24, 2025

Curran Recycling Ltd.
526 McGregor Side Rd
Sarnia, Ontario
N7T 7H5

Site Location: 526 McGregor Side Road
526 McGregor Side Rd
Sarnia City, County Of Lambton
N7T 7H5

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 4.8 hectare Waste Disposal Site including:

a Transfer Facility to be used for the transfer of Non-hazardous solid waste;

a Processing Facility to be used for the processing and transfer of Non-hazardous solid waste limited to the items listed in Schedule "B" of this Approval; and

the transfer and processing of the following types of liquid industrial waste:

liquid industrial waste from spill clean-ups, excavation of soils by hydro-excavating or daylighting, catch basin clean out, infiltration of ground/surface water into an excavation and also includes the following liquid industrial waste classes; 111, 112, 113, 114, 121, 122, 123, 131, 132, 133, 134, 135, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 211, 212, 213, 221, 222, 231, 232, 233, 241, 242, 251, 252, 253, 254, 261, 262, 263, 266, 267, 268, 269, 270, 281, 282 as described in the Ministry's document entitled "New Ontario Waste Classes" dated January 1986 and as amended from time to time.

all in accordance with the following plans and specifications as listed in Schedule "A".

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

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

1. DEFINITIONS

“Adverse Effect” is as defined in the EPA;

“Approval” means this Environmental Compliance Approval and any Schedules to it, including the application and supporting documentation listed in Schedule "A";

“ARA” means the *Aggregate Resources Act*, R.S.O. 1990, c. A.8, as amended;

"Director" means any Ministry employee appointed in writing by the Minister pursuant to Section 5 of the EPA as a Director for the purposes of Part V of the EPA;

“District Manager” means the District Manager, Sarnia District Office, Ontario Ministry of the Environment;

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

“Inert Fill” is as defined in Reg. 347;

"Liquid Waste" means waste that has a slump of more than 150 millimetres using Test Method for the Determination of Liquid Waste (slump test) detailed in Reg. 347;

“m^3” means cubic metres;

"Ministry" means Ontario Ministry of the Environment;

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

“O. Reg. 153/04” means Ontario Regulation 153/04: Record of Site Condition – Part XV.1 of the EPA;

“O. Reg. 406/19” means Ontario Regulation 406/19: (On-site and Excess Soil Management), made under the EPA;

"Owner" means any person that is responsible for the establishment or operation of the site being approved by this Approval, and includes Curran Recycling Ltd., its successors and assigns;

“OWRA” means the Ontario Water Resources Act, R.S.O. 1990, c. O-40, as amended from time to time;

“PA” means the Pesticides Act, R.S.O. 1990, c. P-11, as amend from time to time;

"Permit" means any instrument under a provincial Act or any instrument under a federal

Act that can regulate the quality or quantity of Tested Soil deposited at a receiving site, and includes the following:

a. a by-law under section 142 of the Municipal Act, S.O. 2001, c.25 or a permit issued pursuant to a by-law passed under that section,

b. a development permit for the receiving site granted under a Regulation made pursuant to section 28 of the Conservation Authorities Act, R.S.O. 1990. c. C.27, as amended; or

c. an approval under the Planning Act, R.S.O. 1990, c. P.13 that can regulate the quality and quantity of Tested Soil deposited at a receiving site;

"Phase I ESA" means Phase I Environmental Site Assessment, as defined in Ontario Regulation 153/04, as amended;

"Phase II ESA" means Phase II Environmental Site Assessment, as defined in Ontario Regulation 153/04, as amended;

"Processed Waste Material" means concrete, asphalt, shingles, brick, wood, metals, aggregate, lime, cardboard, paper, glass, rubber and plastics which have been separated, crushed, screened;

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

"Qualified Person" means a person who meets the qualifications to be a qualified person for conducting a phase one and a phase two environmental site assessment and for completing certifications in a record of site condition, as set out in Section 5 of O. Regulation 153/04 made under the EPA;

"Reg. 347" means Regulation 347, R.R.O. 1990, made under the EPA, as amended from time to time;

“Residual Waste” means waste remaining after processing that is destined for final disposal or further processing at another approved waste disposal facility;

"Rock" means a naturally occurring aggregation of one or more naturally occurring minerals that is 2 millimetres or larger in size or that does not pass the US #10 sieve. Rock is an earth material limited to coarse sand, gravel, cobbles and boulders, as defined by Unified Soil Classification System;

"RSC" means the record of site condition;

"Site" means the Processing Facility and the Transfer Site located at 526 McGregor Side Road, in the City of Sarnia, Ontario;

"Soil" means unconsolidated naturally occurring mineral particles and other naturally occurring material resulting from the natural breakdown of rock or organic matter by physical, chemical or biological processes that are smaller than 2 millimetres in size or that pass the US #10 sieve. Soil is an earth material limited to medium sand, fine sand, silt and clay, as defined by Unified Soil Classification System;

"Soil Rules" is as defined O. Reg. 406/19;

"Soil Standards" means the soil standards in the Standards Document;

"Standards Document" means the Ministry document entitled *"Soil, Ground Water and Sediment Standards for Use Under Part XV.1 of the Environmental Protection Act"*, revised version April 15, 2011, as amended;

"Table 2 Soil Standards" means the full depth generic site condition standards for non-potable ground water site conditions for industrial/commercial/community property use listed in Table 2 of the Standards Document;

"TCLP" means Toxicity Characteristic Leaching Procedure as described in Reg. 347; and

"Tested Soil" means the Soil that has been tested in accordance with this Approval to demonstrate compliance with the appropriate soil quality criteria set out in Condition 41;

"Trained Person" means a person knowledgeable in the following through instruction and/or practice:

i. relevant waste management legislation, regulations and guidelines;

ii. major environmental concerns pertaining to the waste to be handled;

iii. occupational health and safety concerns pertaining to the processes and wastes to be handled;

iv. management procedures including the use and operation of equipment for the processes and wastes to be handled;

v. emergency response procedures;

vi. specific written procedures for the control of nuisance conditions;

vii. specific written procedures for refusal of unacceptable waste loads; and

viii. the requirements of this Approval.

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

TERMS AND CONDITIONS

GENERAL

Compliance

2. 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 is notified of this Approval and the conditions herein and shall take all reasonable measures to ensure any such person complies with the same.

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

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

Build, etc. in Accordance

5. Except as otherwise provided by these conditions, the Site shall be designed, developed, used, maintained and operated, and all facilities, equipment and fixtures shall be built and installed, in accordance with the conditions of this Approval, the Design and Operations Report, as amended from time to time, and all other supporting documents listed in Schedule "A" of this Approval.

Interpretation

6. 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.

7. 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.

8. 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.

9. 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.

Other Legal Obligations

10. 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.

Adverse Effects

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

12. 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 to the natural environment or impairment of water quality.

Change of Owner

13. The Owner shall notify the Director in writing, and forward a copy of the notification to the District Manager *,* within 30 days of the occurrence of any changes to:

a. the ownership of the Site *;*

b. the Operator of the Site *;*

c. the address of the Owner or Operator;

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

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

Financial Assurance

15. The Owner shall maintain with the Director, Financial Assurance, as defined in Section 131 of the Act, for the amount of $233,874. This Financial Assurance shall be in a form acceptable to the Director and shall provide sufficient funds for the analysis, transportation, Site clean-up, monitoring and disposal of all quantities of waste on the Site at any one time.

16. Commencing on July 31, 2025 and at intervals of five (5) years thereafter, the Owner shall submit to the Director, a re-evaluation of the amount of Financial Assurance to implement the actions required under Condition 15. The re-evaluation shall include an assessment based on any new information relating to the environmental conditions of the Site and shall include the costs of additional monitoring and/or implementation of contingency plans required by the Director upon review of the closure plan and annual reports. The Financial Assurance must be submitted to the Director within ten (10) days of written acceptance of the re-evaluation by the Director.

17. The amount of Financial Assurance is subject to review at any time by the Director and may be amended at his/her discretion. If any Financial Assurance is scheduled to expire or notice is received, indicating Financial Assurance will not be renewed, and satisfactory methods have not been made to replace the Financial Assurance at least sixty (60) days before the Financial Assurance terminates, the Financial Assurance shall forthwith be replaced by cash.

Inspections

18. No person shall hinder or obstruct a Provincial Officer in the performance of their duties, including any and all inspections authorized by the OWRA, the EPA or the PA of any place to which this Approval relates, and without limiting the foregoing to:

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

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

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

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

Information and Record Retention

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

20. 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.

CONSTRUCTION

21. A set of as-built drawings, including a Site Plan, showing the Site as constructed shall be kept up to date and shall be submitted to the Director and the District Manager. An amendment to this Approval shall be sought for changes requiring approval.

OPERATION AND MAINTENANCE

Operation

22. The Owner shall operate and maintain the Site in a manner such that vermin, vectors, dust, litter, odour, noise and traffic do not create a nuisance. The Owner shall develop and implement a nuisance control program for the Site that includes inspection, mitigation and contingency plans to ensure that vermin, vectors, dust, litter, odour, noise and traffic do not create an adverse effect.

23. The Owner shall ensure that a vegetated strip is maintained as shown on the most recently approved version of the Site Plan found in Schedule "A" of this Approval.

24. The Owner shall ensure that all reasonable measures are taken to prevent the generation of fugitive emissions from the Site. If fugitive emissions from the Site cause or have the potential to cause an adverse effect, as defined in the EPA, immediate action shall be taken to abate the emission. If these measures do not abate the emission, the Site operations contributing to the emission shall cease immediately until the cause of the emission has been abated to the satisfaction of the District Manager .

Waste Type

25. Only the following types of waste shall be accepted at the Site:

a. non-hazardous solid waste to be accepted at the Transfer Facility and non-hazardous solid waste limited to the wastes listed in Schedule "B" of this Approval to be processed at the Processing Facility;

b. liquid industrial waste from spill clean ups, excavation of soils by hydro-excavating or daylighting, catch basin clean out, infiltration of ground/surface water into an excavation and also includes the following liquid industrial waste classes; 111, 112, 113, 114, 121, 122, 123, 131, 132, 133, 134, 135, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 211, 212, 213, 221, 222, 231, 232, 233, 241, 242, 251, 252, 253, 254, 261, 262, 263, 266, 267, 268, 269, 270, 281, 282 as described in the Ministry's document entitled "New Ontario Waste Classes" dated January 1986 and as amended from time to time;

c. further to the limitations specified in Condition 25. b), the Owner shall not accept the following hazardous wastes as defined in Reg. 347:

i. pathological waste (P);
ii. PCB waste (D);
iii. radioactive waste;
iv. acute hazardous waste chemical (A);
v. hazardous industrial waste (H);

vi. hazardous waste chemical (B);
vii. ignitable waste (I);
viii. corrosive waste (C);
ix. reactive waste (R);
x. severely toxic waste (S)
xi. leachate toxic waste(T).

26. Waste that is classified as hazardous waste and/or PCB Waste, as defined in Reg. 347, as well as putrescible waste and food related waste may not be received at this Site.

Waste Limits

27. a. i. no more than 1350 tonnes per day of waste shall be accepted at the Site;

ii. no more than 116,000 tonnes of non-hazardous waste shall be accepted at the Site, on an annual calendar year basis;

b. i. no more than 100 tonnes of liquid industrial waste shall be stored or be present at the Site at any one time;

ii. no more than 1500 tonnes of solid non-hazardous waste shall be stored at the Transfer Station at any one time; and
iii. no more than 55,000 tonnes of solid non-hazardous waste and/or processed waste material shall be stored at the Processing Facility at any one time.

c. If for any reason waste cannot be transferred from the Site, the Site must cease accepting waste.

28. a. The total amount of waste leaving the Site for final disposal, comprised of waste from the transfer operation and Residual Waste arising from the processing operation, shall not exceed, on annual basis, one thousand (1,000) tonnes per day;
b. The amount of Residual Waste generated at the Site shall not exceed fifty (50) tonnes per day; and
c. The amount of Residual Waste stored at the Site shall not exceed fifty (50) tonnes at any time.

29. a. The Owner shall ensure that any Residual Waste generated at the Site that is found to be odorous and/or putrescible, including all food related wastes, shall be segregated and disposed of immediately;
b. The Owner shall ensure that all other Residual Waste generated at the Site shall be disposed of within thirty (30) days; and

c. Notwithstanding the requirements of Conditions 29. a and 29. b. of this Approval, the Owner shall ensure that all waste received at the Transfer Station is not stored at the Site for a period not longer than twelve (12) months.

Service Area

30. The Site may only receive waste that has been generated within the Province of Ontario.

Hours of Operation

31. a. Except when an emergency situation exists, waste may be received at the Site or transferred from the Site between the hours of 6:00 a.m. and 9:00 p.m. The off-loading of vehicles already received at the Site and processing and processing operations may be performed at the Site between the hours of 6:00 a.m. Monday and 12:00 a.m. Saturday (midnight).

b. In the event of an emergency situation the Owner shall notify the District Manager in writing on the day following that day in which waste was either received at the Site or transferred from the Site outside the approved hours of 6:00 am to 9:00 pm Monday to Saturday. The notification shall include the following information:

i. the name of the trained person who was at the Site;
ii. the date and time of the waste shipment;
iii. a description of the type of waste;
iv. the quantity of waste;
v. the source or receiving location of the waste; and
vi. the reason for the emergency.

Site Security and Signage

32. The Owner shall ensure that the Site is secured to prevent unauthorized access. The Owner shall construct and maintain Site fencing as shown in the most recently approved version of the Site Plan as found in Schedule “A” of this Approval. The gates shall be closed and locked whenever a Trained Person is not present to operate the Site.

33. A sign shall be posted and maintained at the main entrance/exit to the Site displaying in a manner that is clear and legible at a distance of twenty-five metres from the public roadway bordering the Site. The sign shall contain the following information:

a. the name of the Site and Owner;
b. the number of this Approval;
c. the normal hours of operation;
d. the allowable and prohibited waste types;
e. a telephone number to which complaints may be directed;
f. a twenty-four (24) hour emergency telephone number (if different from above); and
g. a warning against dumping outside the Site.

34. There shall be no queuing or parking of trucks that are waiting to enter this Site.

Waste Inspection

35. All waste shall be inspected by a Trained Person prior to being accepted at the Site to ensure that the waste is of a type approved for acceptance under this Approval.

36.(1) All incoming and outgoing wastes, except Soil, shall be inspected and tested, as described in the Design and Operation Report, by a Trained Person prior to being received, processed, transferred and shipped to ensure wastes are being managed and disposed of in accordance with the EPA and Reg. 347 .
(2) Furthermore, before accepting any Soil at the Site, the Owner shall require documentation from the generator as to the origin of the Soil and providing, as a minimum, the following Soil characterization information:
a. the generator's name and/or company name, address, and contact information;
b. the source site location;
c. current source site activities and land use;
d. past source site activities and land use, if known;

e. estimated quantity of the Soil to be received at the Site;

f. for Soil destined for transfer for final disposal at an approved non-hazardous waste disposal site, the following Soil sampling and analytical results data as required to demonstrate compliance with the waste disposal site's waste receipt restrictions:

i. sampling protocols, including the number of samples taken and their locations, the sampling methods used and handling of the samples;

ii. analytical results for Regulation 347 Schedule 9 slump test if the Soil has a high moisture content; and

iii. any applicable analytical results demonstrating that the Soil does not trigger any criteria from the hazardous waste definition from Regulation 347, including TCLP analysis;
g. for Soil destined for further processing or re-use as set out in Conditions 44.(1)a. through 44.(1)e., the results of any Phase I ESA or Phase II ESA site assessments

undertaken for the source site in accordance with the Ministry’s requirements under O. Regulation 153/04 or the following Soil sampling and analytical results data, as applicable:

i. sampling protocols, including the number of samples taken and their locations, the sampling methods used and handling of the samples;

ii. analytical results for Regulation 347 Schedule 9 slump test if the Soil has a high moisture content;

iii. any applicable analytical results demonstrating that the Soil does not trigger any criteria from the hazardous waste definition from Regulation 347, including TCLP analysis;

iv. concentrations of petroleum hydrocarbons;

v. concentrations of heavy metals;

vi. other potential contaminants of concern, including volatile organic compounds and semi-volatile organic compounds, based on the current and past source site activities and land use; and

vii. explanation and justification why the requirements listed in Condition 36.(2)g.i. through 36.(2)g.vi. are not applicable.

(3) Any applicable analytical results required by Condition 36.(2) shall be from an

accredited laboratory (Canadian Association for Laboratory Accreditation or equivalent).
37. Notwithstanding the requirements of Condition 36. of this Approval, all reasonable measures in the way of laboratory, compatibility and bench testing of waste and materials shall be taken to ensure that the bulking, blending, mixing, transfer and processing of wastes at the Site will not result in uncontrollable reactions that could result in a fire or release of contaminants to the natural environment.
38. In the event that a load of waste is refused, a record shall be maintained identifying the reason the waste was refused, the type of waste that was refused and the generator and/or the origin of the waste, if known.
39. a. The Owner shall ensure that all Residual Wastes generated at the Site are disposed of in accordance with Reg. 347; and
b. The Owner shall ensure that only haulers approved by the Ministry are used to transport waste and any Residual Waste from the Site.

Processing and Storage

40. Processing and storage of waste at the Site shall be carried out as follows:

a. Processing carried out at the Site for non-hazardous solid waste, except for Soil, is limited to crushing, grinding, screening and picking/sorting operations as described in the Design and Operations Report, as amended from time to time, as listed in the attached Schedule "A".

b. Processing carried out at the Site for liquid industrial waste is limited to the solidification of liquid industrial waste as described in the Design and Operations Report, as amended from time to time, as found within Schedule "A" which forms part of this Approval.

c. Storage and secondary containment of the liquid industrial waste shall be handled in accordance with the following conditions:

i. liquid industrial waste shall be stored in the mixing bin and covered at all times;

ii. the secondary containment shall be clear of debris including vehicles, soil, and waste at all times; and

iii. if precipitation accumulates over 40% of the storage capacity of the secondary containment system, the Owner shall immediately pump the precipitation into the mixing bin for processing and disposal.

d. Soil mixing, bulking or blending shall be carried out as follows:

i. only Soils intended for re-use and with characteristics that comply with the quality criteria set out in Condition 41. may be bulked, mixed or blended together;

ii. at no time, shall any Soil intended for re-use be mixed or blended with any waste that is subject to the requirements under section 20.2 of Part II.1 of the *EPA* requirements;

iii. at no time, shall any Soil intended for re-use be mixed, bulked or blended with any other Soil, Rock or any other material if the principal purpose of the mixing, bulking or blending is to reduce the contaminant concentrations in the Soil;

iv. Soil intended for re-use may be mixed or blended with Rock to meet the customer's specifications, if Rock is an Inert Fill; and

v. only Tested Soil intended for re-use may be mixed or blended with Rock to meet the customer's specifications.

e. The Owner shall prepare and retain at the Site a written justification for the mixing, bulking or blending of Soil intended for re-use, as approved in Condition 40.d., including confirmation that the mixing, bulking or blending will not affect the ability of the Tested Soil to be used as fill at the proposed receiving site.

Soil Disposal Site Requirements

41. The Tested Soil shall meet the following quality criteria:

(1) the quality criteria required for the specific end-use of the Tested Soil as set out in Condition 44.; and

(2) any other applicable requirements for the receiving site as required by the local municipality, the local conservation authority and any applicable provincial/federal legislation.

42. Characterization of the Soil shall be carried out as follows:

(1) The Owner shall verify the generator's characterization of the incoming Soil from each source, including the incoming Soil from emergency spill response activities, as follows:

a. the Owner shall collect a minimum of one (1) representative sample from a stockpile during its construction in order to verify the quality of the Soil;

b. samples shall be collected in accordance with the requirements set out in Condition 43.(2) and submitted to an accredited laboratory for the required analysis;

c. if Soil is destined for transfer to an approved waste disposal site, the following parameters shall be tested for:

i. the parameters required to demonstrate compliance with the waste disposal site's waste receipt restrictions;

d. if Soil is destined for re-use as set out in Conditions 44.(1)b. through 44.(1)e., the following parameters shall be tested for:

i. parameters required to confirm that the incoming Soil is a solid and a non-hazardous waste, including relevant parameters set out in Schedule 4 entitled “Leachate Quality Criteria” of Regulation 347;

ii. petroleum hydrocarbon fractions: F1 (C6-C10), F2 (>C10-C16), F3 (>C16-C34), and F4 (>C34);

iii. Benzene, Toluene, Ethyl Benzene and any other volatile organic compounds based on the source site uses and history;

iv. semi-volatile organic compounds based on the source site uses and history;

v. heavy metals based on the source site uses and history; and

vi. any other contaminants based on the source site uses and history.

e. testing shall be done in accordance with the requirements set out in Condition 43.(3).;

(2) Within twenty four (24) hours from its receipt, or on the next business day, whichever comes first, the Owner shall characterize the incoming Soil from emergency spill response activities, as follows:

a. if Soil is destined for final disposal at a non-hazardous waste landfill site, and no testing has been done by the contractor at the site of the spill, the Owner shall test the Soil for the parameters required to determine if the incoming Soil is a solid and a non-hazardous waste, including relevant parameters set out in Schedule 4 entitled “Leachate Quality Criteria” of Regulation 347;

b. if Soil is destined for transfer to an approved waste disposal site, the Owner shall test the Soil for the following parameters:

i. the parameters required to demonstrate compliance with the waste disposal site's waste receipt restrictions;

c. if Soil is destined for re-use as set out in Conditions 44.(1)b. through 44.(1)e., the Owner shall test the Soil for the following parameters:

i. parameters required to determine if the incoming Soil is a solid and a non-hazardous waste, including relevant parameters set out in Schedule 4 entitled “Leachate Quality Criteria” of Regulation 347;

ii. petroleum hydrocarbon fractions: F1 (C6-C10), F2 (>C10-C16), F3 (>C16-C34), and F4 (>C34);

iii. Benzene, Toluene, Ethyl Benzene and any other volatile organic compounds based on the source site uses and history and the nature of the spill;

iv. semi-volatile organic compounds based on the source site uses an history and the nature of the spill;

v. heavy metals based on the source site uses and history and the nature of the spill; and

vi. any other contaminants based on the source site uses and history and the nature of the spill.

d. the Owner shall collect samples from the storage stockpiles of the Soil generated from each location where the emergency spill response activities took place;

e. samples shall be collected in accordance with the requirements set out in Conditions 43.(1) and (2) and submitted to an accredited laboratory for the required analysis; and

f. testing for the required parameters shall be done in accordance with the requirements set out in Condition 43.(3).

(3) The Owner shall characterize the Soil destined for re-use off-Site, the mixed, blended or bulked Soil destined for re-use off-Site and prior to mixing or blending, the Soil intended to be mixed or blended with the Rock to confirm compliance of the Tested Soil with the quality criteria set out in Condition 41.

(4) All of the Soil destined for the same final destination shall be sampled and tested in accordance with the requirements in set out in Condition 43.

43. Soil sampling and testing shall be carried out as follows:

(1) Soil sampling frequency shall be as follows:

a. For the Soil stockpiles size smaller than 3 m^3, the Owner shall ensure that a minimum of three (3) aliquots are taken for each cubic meter of the Soil and that a composite sample of the Soil is prepared for the required analysis.

b. For the Soil stockpiles of size greater than 3 m^3 but less than 5,000 m^3, the Owner shall ensure that the Soil representative individual grab samples are taken in accordance with the following sampling frequency for the required analysis:

i. for stockpile volume of less than 50 m^3, a minimum of 1 sample shall be collected;
ii. for stockpile volume of more than 50 m^3 but less than 150 m^3, a minimum of 3 samples shall be collected;
iii. for stockpile volume of more than 150 m^3 but less than 500 m^3, a minimum of 5 samples shall be collected;
iv. for stockpile volume of more than 500 m^3 but less than 1500 m^3, a minimum of 10 samples shall be collected;
v. for stockpile volume of more than 1500 m^3, a minimum of 15 samples shall be collected;

c. For the Soil stockpiles of size greater than 5,000 m^3, the sampling frequency shall be determined in accordance with the formula set out in the Ministry’s document entitled *"Principles of Sampling and Analysis of Waste for TCLP under Regulation 347"* dated February, 2002, as amended, and the Owner shall ensure that the Soil representative individual grab samples are taken for the required analysis.

(2) Sampling shall be carried out as follows:

a. All Soil stockpiles sampling shall be carried out in accordance with procedures set out in the Ministry's document entitled " *Principles of Sampling and Analysis of Waste for TCLP under Regulation 347* " dated February, 2002, as amended.

b. Samples shall be handled in accordance with the instructions of the accredited laboratory carrying out the analytical testing.

(3) Testing shall be carried out as follows:

a. To verify compliance with the Soil Standards, the analysis shall be undertaken in compliance with the *"Protocol for Analytical Methods Used in the Assessment of Properties under Part XV.1 of the Environmental Protection Act",* dated July 1, 2011, as amended, at an accredited laboratory and in accordance with the industry standards.

b. To determine if the Soil is a solid, the testing shall be carried out in compliance with the procedure in Regulation 347.

c. To confirm that the Soil is not a leachate toxic waste, the testing shall be carried out in accordance with the TCLP in Regulation 347.

44. The Tested Soil may be re-used as follows:

(1) Tested Soil may leave the Site only to be deposited at any one of the following receiving sites:

a. a waste disposal site approved under Part II.1 of the EPA to accept the Tested Soil;

b. a RSC property within the meaning of O. Reg. 153/04, provided that the Tested Soil deposition on, in or under the property complies with the requirements set out in s. 55 of O. Reg. 153/04;

c. a property that is a pit or quarry under the ARA, if:

i. the Qualified Person has confirmed in writing that the concentrations of constituent contaminants of the Tested Soil and the deposition of the Tested Soil at the pit or quarry complies with the requirements of the ARA, and the regulations, the site plan and the conditions of the licence or permit under the ARA; and

ii. the Qualified Person has determined it is appropriate to bring the Tested Soil to the site and this determination was done with consideration given to the contaminant volumes and loading, the impacts on the existing conditions at the receiving site and the introduction of new contaminants to the receiving site;

d. a property for which a Permit has been issued and the Tested Soil complies with the requirements outlined in the Permit;

e. any other receiving site not already listed in paragraphs 44.(1)a. though 44.(1)d., above, provided that, this receiving site has been assessed by a Qualified Person and the Qualified Person has confirmed in writing that the maximum concentrations of constituent contaminants of the Tested Soil do not exceed the following quality criteria:

i. the receiving site's existing average concentrations of said constituents in the soil horizon in which the Tested Soil is to be deposited, or in the soil horizon of equivalent depth immediately below the fill if the Tested Soil is to be placed on top of the existing soil surface;

ii. the appropriate Table 2 Soil Standards for the current land use of the receiving site if the said Table 2 Soil Standards are lower than the receiving site's existing average concentrations referred to in 44.(1)(e)i., above; or

iii. the appropriate Table 2 Soil Standards for the current land use of the receiving site if a Qualified Person has confirmed in writing that:

A. the Qualified Person has determined it is appropriate to use the applicable Soil Standards for bringing the Tested Soil to the receiving site; and

B. has determined this with consideration given to the Ministry document *"Rationale for the Development of Soil and Ground Water Standards for Use at Contaminated Sites in Ontario, revised version April 15, 2011",* including consideration of the factors used in setting the Soil Standards.

(2) Notwithstanding Condition 44.(1)e., the sites covered under Condition 44.(1)e. cannot include a type of property described in section 41.(1) of O. Reg. 153/04.

(3) Before shipping any Tested Soil from the Site, the Owner shall obtain from the receiving site's owner a written confirmation certified by the Qualified Person, that:

a. the Tested Soil quality and quantity is appropriate for the receiving site;

b. the receiving site's owner agrees to accept the Tested Soil; and
c. the deposition of the Tested Soil at the receiving site will not cause an Adverse Effect to human health or the environment.

(4) The Qualified Person shall certify that the confirmations required in Conditions 44.(1) and 44.(3), above, have been based on engineering or scientific opinions made in accordance with generally accepted principles and practices as recognized by members of the environmental engineering or science profession or discipline practising at the same time and in the same or similar location.

(5) Any Tested Soil that exceeds the quality criteria appropriate for its intended site/property end-use shall be:

a. segregated from all other waste and Tested Soil at the Site; and

b. removed from the Site within fourteen (14) days of the date of the compliance testing report using an approved hauler, as required, unless otherwise authorized in writing by the District Manager.

45. The Owner shall ensure that all Rock that does not meet the definition of *Inert Fill,* all *Soil* that contains more than de minimis amounts of construction and/or demolition waste or other non-hazardous waste debris and all *Soil* that contains foundry sands, slag, emission control dusts or treatment residues is transferred to:

(1) a waste disposal site approved to accept that type of waste to be further processed, used or disposed of in accordance with the Environmental Compliance Approval for that site; or

(2) a location not required to obtain an Environmental Compliance Approval but having an appropriate jurisdictional approval or a license, if required.

Site Inspection

46. The Owner must conduct daily inspections of the equipment and facilities to ensure that all equipment and facilities at the Site are maintained in good working order at all times. Any deficiencies detected during these regular inspections must be promptly corrected. A written record must be maintained at the Site, which includes the following:
a. name and signature of trained personnel conducting the inspection;
b. date and time of the inspection;
c. list of equipment inspected and all deficiencies observed;
d. a detailed description of the maintenance activity;
e. date and time of maintenance activity; and
f. recommendations for remedial action and actions undertaken.
47. The Owner, in addition to inspections and documentation requirements carried out in Condition 46. of this Approval, must conduct on each operating day, a visual inspection of the following areas to ensure the Site is secure and that no off-site impacts such as vermin, vectors, odour, noise, dust and litter, result from the Site's operation:
a. waste loading/unloading areas and associated containment areas;
b. waste storage areas and associated containment areas; and
c. security fence, barriers and property line.

Surface and Groundwater Monitoring

48. Groundwater and surface water monitoring and reporting shall be conducted in accordance with the requirements of the Site's Environmental Compliance Approval for an Industrial Sewage Works, as amended from time to time, that has been issued by the Ministry pursuant to the requirements of Section 53 of the OWRA.

Other approvals

49. The Owner shall ensure that Site processes and equipment are not operated unless all air approvals under Section 9 of the EPA, where applicable, have been obtained.
50. At no time is burning or incineration of any materials allowed on the Site.
51. The Owner shall manage all direct discharges from this Site including stormwater run-off in accordance with appropriate Municipal, Provincial and or Federal Legislation, Regulations and By-laws.

Training

52. A training plan shall be developed and maintained for all employees that operate the Site. Only a Trained Person may operate the Site or carry out any activity required

under this Approval. The training plan shall ensure through proper written records that all personnel directly involved with activities relating to the Site have been trained with respect to:

a. the terms, Conditions and operating requirements of this Approval;

b. the operation and management of all transfer, processing, storage and contingency measures equipment and procedures;

c. any environmental and occupational health and safety concerns pertaining to the Site and wastes to be transferred/processed; and

d. relevant waste management legislation and Regulations under the EPA, and OWRA.

53. The Owner shall ensure that a Trained Person is available at all times during the hours of operation of this Site to supervise all loading, unloading, transfer or processing of waste material at the Site **.**

Complaint Response

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

a. Record and number each complaint, either electronically or in a separate log book, and shall include the following information:

i. the nature of the complaint,
ii. if complaint is odour or nuisance related, the weather conditions and wind direction at the time of the complaint;
iii. the name, address and the telephone number of the complainant (if provided);
iv. the time and date of the complaint;

b. The Owner, upon notification of the complaint, shall initiate appropriate steps to determine all possible causes of the complaint, proceed to take the necessary actions to eliminate the cause of the complaint and forward a formal reply to the complainant; and

c. The Owner shall complete and retain on-site a report written within one (1) week of the complaint date, listing the actions taken to resolve the complaint and any recommendations for remedial measures, and managerial or operational changes to reasonably avoid the recurrence of similar incidents.

Spill Contingency and Emergency Response Plan

55. The Owner shall ensure that the Spill Contingency and Emergency Response Plan for the Site be kept up to date, and a copy shall be retained in a central location on the Site and shall be accessible to all staff at all times. Additional copies shall be provided to the District Manager, the local Municipality and the Fire Department. The Emergency Response Plan shall include, but is not necessarily limited to:

a. emergency response procedures to be undertaken in the event of a spill or process upset, including specific clean up methods for each different type of waste the Site is

approved to accept;
b. a list of equipment and spill clean up materials available in case of an emergency; and
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 waste management companies available for emergency response.
56. Changes to the Spill Contingency and Emergency Response Plan shall be submitted to the Director for approval.
57. The equipment, materials and personnel requirements outlined in the Spill Contingency and Emergency Response Plan shall be immediately available on the Site at all times. The equipment shall be kept in a good state of repair and in a fully operational condition.
58. All staff that operate the Site shall be fully trained in the use of the Spill Contingency and Emergency Response Plan, and in the procedures to be employed in the event of an emergency.
59. The Owner shall immediately take all measures necessary to contain and clean up any spill or leak which may result from the operation of this Site and immediately implement the emergency response plan if required.

Design and Operations Report

60. The Design and Operations Report shall be retained at the Site; kept up to date; and be available for inspection by Ministry staff. The Design and Operations Report shall contain at a minimum the information specified for a waste processing site as described in the most recent version of the Ministry publication "Guide For Applying For Approval of Waste Disposal Site".
(1) No later than six (6) months from the date of this Approval, the Owner shall prepare and submit an updated Design and Operations Report to the Director for approval. This report shall be reflective of the current operations at the Site and shall include the following information as a minimum:

1. a high-level description of the operations at the Site;

2. conceptual design of the operations at the Site;

3. site map(s) showing the geographic location of the Site and details of the surrounding areas;

4. a site plan showing the property, the exterior of the Transfer Facility and the interior of the Transfer Facility, with labels describing all boundaries, delineation of the Transfer Facility, the Processing Facility and the Soil Management Site areas of the Site, security measures, constructed surfaces, waste handling and designated storage locations (indoor and outdoor) for various waste types approved under this Approval,

waste management equipment, spill containment areas, drains, on-Site roads and other details relating to the operation of the Site;

5. the hours of operation for the Site;

6. a description of all wastes that may be received at, processed and shipped from the Site;

7. service area for the Site;

8. a description of the reagents to be received at the Site to be used in the solidification activities (including safety data sheets and technical data sheets);

9. written procedures to ensure the safe use of the reagents (e.g., mixing rates, amount of liquid soil, analytical results demonstrating reagents affect on contaminant concentrations, etc.) during the liquid soil dewatering or solidification process prepared by a Qualified Person or supervisee of a Qualified Person;

10. a detailed description of all waste receiving, handling, processing and storage procedures that may be carried out at the Site, including waste screening and testing procedures, waste refusal procedures, waste sorting procedures, waste bulking, blending and mixing procedures, waste storage procedures, waste shipping procedures, record keeping procedures and any other procedures relating to the management of waste at the Site;

11. details of spill containment at the Site, including a description of all spill containment procedures and infrastructure employed at the Site and calculations used to design the existing spill containment;

12. a description of all emergency response and spill response procedures employed at the Site;

13. details of staff training;

14. details of site inspections carried out at the Site;

15. a description of how process wastewater will be managed;

16. details on how excess soil will be segregated and stockpiled in accordance with the Soil Rules;

17. a description of the sampling/testing requirements of excess soil completed by or supervised by a Qualified Person as required under O. Reg. 406/19;

18. Quality Assurance/Quality Control Program for Sampling/Testing of waste required under this Approval; and

19. drawings, diagrams and photographs that support the information required above where available.

61. Changes to the Design and Operations Report shall be submitted to the Director for approval.

Labeling

62. All waste storage containers at the Site, shall have a label or sign with the following information: volume, waste class(es), waste characteristic (such as WHMIS and TDGA classification when applicable). The label or sign shall be clearly visible for inspection and record keeping.

Segregation

63. The Owner shall ensure that all waste shall be stored in accordance with Ministry publication “Guidelines of EPA Measures at Chemical Storage Facilities, dated October 1978, as amended. Wastes shall be segregated from other incompatible wastes and materials.

Daily Log Book

64. The Owner shall maintain, at the Site for a minimum of five years, a log book or electronic file format which records daily the following information. All amounts must be recorded in Metric:

a. the date, time, source, type, waste class and quantity of all waste received;
b. the results of all analyses of all incoming waste;
c. the total quantity and type of all waste processed on-site each day;
d. the date, time, destination, type, waste class and quantity of all waste, soil and Processed Waste Material shipped off-site;
e. the date, time, source, type, waste class and quantity of any incoming waste rejected and the reason for the rejection;
f. the date, time, destination, type, waste class and quantity of any rejected waste shipped off-site;
g. a running daily total of all waste remaining on-site within the Transfer Station;
h. a running daily total of all waste and Processed Waste Material remaining on-site within the Processing Facility;
i. a running daily total of all waste received on-site;
j. a running total of the quantity of waste currently being processed;
k. the amount of any Processed Waste Material or unprocessed waste which was used on the Site or for site development;
l. A description of any problems, upsets, spills, or complaints which occurred and any remedial actions undertaken to mitigate or prevent a recurrence; and
m. the signature of the Trained Person completing the report.

Annual Report

65. By March 31, 2006, and on an annual basis thereafter, the Owner shall submit an annual report to the District Manager for the previous calendar year. Each report shall include the following information

a. A detailed monthly and yearly summary of Condition 64. including a mass balance for the year of operation;

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

c. any changes to the Spill Contingency and Emergency Response Plan, the Design and Operations Report and the Closure Plan that have been approved by the Director since the last Annual Report; and

d. any recommendations to minimize environmental impacts from the operation of the Site and to improve Site operations and monitoring programs in this regard.

Closure Plan

66. Six (6) months prior to the planned closure of this Site, the Owner shall provide to the Director, for written approval, a written Closure Plan for 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.

67. The Site shall be closed in accordance with the approved Closure Plan.

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

69 *.* a *.* Prior to accepting waste at this Site *,* for each new generator and for new each waste class produced by the generator, the Owner shall ensure a representative sample for each waste class is taken on a semi annual basis and analyzed for, as a minimum the parameters in Schedule “C”, and in addition to any other parameters and analyses to ensure proper waste classification and characterization in accordance with Reg. 347 and EPA.

b *.* The Owner shall request in writing that generators of waste notify the Owner of any changes or process modifications which may affect the waste class and/or characteristics. Upon receipt of notification of changes, the Owner shall again undertake the waste analysis as described in Condition 69. a) prior to accepting the waste at the Site.

c. Prior to being received, bulked, transferred and shipped, the Owner must ensure that all wastes are being managed and disposed of in accordance with the EPA and Reg. 347.

70. TCLP sampling of liquid industrial waste and solidified waste shall be done in accordance with the Ministry document entitled "Principles of Sampling and Analysis of Waste for TCLP under Ontario Regulation 347" dated February 2002, and revised from time to time.

71. a. At a minimum requirement, each batch of processed waste must be in compliance with at least two slump tests drawn from different locations of the batch waste to indicate that the waste is not a Liquid Waste prior to loading the waste for

transportation from the Site.
b. Processed waste must be in compliance with all slump tests to indicate that the processed waste is not a Liquid Waste as detailed in the Design and Operations Report.
c. As a minimum requirement, one TCLP test shall be taken for every 200 tonnes of processed waste and shall meet the TCLP test as per Schedule 4 of Reg. 347 prior to loading the waste for transportation from the Site.
d. All TCLP and slump tests and results shall be recorded in a daily log book and be included as part of the annual report as described in Condition 65.
72. The Owner shall provide an area of containment around the liquid industrial waste storage and processing area which provides sufficient storage volume to contain, as a minimum, 110% of the capacity of the largest storage tank's volume, and accounting for all spill trajectories from pressurized and unpressurized containers or systems.

SCHEDULE "A"

This Schedule "A" forms part of the Environmental Compliance Approval: A620166
1. Application for a Certificate of Approval for a Waste Disposal Site (Processing) dated January 16, 1997 with supporting information.
2. Application for a Certificate of Approval for a Waste Disposal Site, signed by P. Fleischer, dated March 15, 2001.
3. Proposed Changes to Certificate of Approval #A620166 prepared by Curran Recycling Ltd., dated March 22, 2001.
4. Facsimile received from P. Fleisher, Curran Recycling Ltd., to E. Zaltsberg, MOE, including additional information in support of the application, dated July 11, 2001.
5. Letter from P. Fleischer of Curran Recycling Ltd. (re: Site FA) to E. Zaltsberg of the Ministry, dated September 28, 2001.
6. Letter from P. Fleischer of Curran Recycling Ltd. to T. Edwards, MOE, regarding the annual capacity of the Site, dated June 30, 2003.
7. Letter from P. Fleischer of Curran Recycling Ltd. to T. Edwards, MOE, regarding spent lime storage, sent via email and dated December 16, 2004.
8. Design and Operations Report, Curran Recycling Ltd., dated December 16, 2004.
9. Site Plan of 526 McGregor Sideroad, drawing number C100-REV.9, prepared by BKL Consulting Engineers, dated June 10, 2005.
10. Stormwater Management Plan of 526 McGregor Sideroad, drawing number C101-REV.9, prepared by BKL Consulting Engineers, dated June 10, 2005.
11. Report entitled "Proposed Amendment to Provisional Certificate of Approval No. A620166, Curran Recycling" dated March 21, 2006 that includes the following information:
a. Copy of Previous EBR Registry;
b. Public Consultation/Participation;
c. Copy of the Public Notice;
d. Copy of Area Map and Mailing List of Recipients of Public Notice;
e. Open House: Summary of Participation, information handout;
f. Revised Design and Operation Report (March 2006).

12. Letter dated April 11, 2006 from Paul Fleisher (Curran Recycling) to Ministry of the Environment (EAAB) which includes the following information:
a. A completed application for a Provisional Certificate of Approval for a Waste Disposal Site, signed by Mr. Chris Curran, President, Curran Recycling, dated April 11, 2005;
b. EBR project description;
c. Public Notice;
d. Updated Financial Assurance and Liability Insurance.
13. Fax dated June 14, 2006 from Mr. Paul Fleisher (Curran Recycling) to Richard Saunders (MOE) regarding public notice and list of recipients.
14. Email dated June 15, 2006 from Mr. Paul Fleisher (Curran Recycling) to Richard Saunders (MOE) regarding the dimensions of the "Stone Mizer", maximum amount of LIW per day, calculations for containment area, waste segregation, waste screening, slump testing, run-off water.
15. Email dated August 4, 2006 from Mr. Paul Fleisher (Curran Recycling) to Richard Saunders (MOE) regarding the volume of "Stone Mizer", ramp up to the "Stone Mizer", and cleaning of the "Stone Mizer."
16. Email dated August 31, 2006 from Mr. Paul Fleisher (Curran Recycling) to Richard Saunders (MOE) regarding waste storage on site and waste screening.
17 Email dated September 18, 2006 from Mr. Paul Fleisher (Curran Recycling) to Richard Saunders (MOE) regarding minimum requirements for the waste screening.
18. Email dated November 2, 2006 from Mr. Paul Fleisher (Curran Recycling) to Richard Saunders (MOE) regarding additional requirements for outgoing solidified waste characterization.
19. Letter dated October 29, 2007 from Paul Fleischer, Curran Recycling Ltd. to Michelle Vandenheuvel, London District Office, Ministry of the Environment regarding Financial Assurance calculations.
20. Letter dated September 12, 2008 from Francis Chang, P. Eng., Senior Review Engineer - Waste, EAAB, Ministry of the Environment to Paul Fleischer, Curran Recycling Ltd. regarding Financial Assurance calculations.
21. Electronic mail dated September 30, 2008 from Paul Fleischer to Francis Chang and Chris Hutt (London District Office) with electronic copy of a Letter of Credit #SBGT701569 issued by CIBC in the amount of $25,829.07 as an amendment to previous Letter of Credit in the amount of $153,343.
22. Letter dated September 30, 2008 from Paul Fleischer, Curran Recycling Ltd. to Francis Chang, P. Eng., Senior Review Engineer - Waste, EAAB, Ministry of the Environment with attached revised Financial Assurance calculations.
23. Letter dated November 8, 2011 from Paul Fleischer, Curran Recycling Ltd., to the Director, MOE EAAB regarding submission of Financial Assurance re-evaluation information.
24. E-mail dated July 20, 2012 from Paul Fleischer, Curran Recycling Ltd to Roman Lysiak, MOE regarding submission of additional information.
25. E-mail dated September 10, 2012 from Paul Fleischer, Curran Recycling Ltd to

Roman Lysiak, MOE regarding submission of additional information.
26. Application for amendment to Environmental Compliance Approval dated August 14, 2012, including supporting documentation.
27. Email dated August 30, 2012 [4:18 P.M.] from David Kidd, Curran Recycling Ltd. to Andrea Solis, MOE regarding additional information requested by the Ministry.
28. Letter dated October 18,2012 from K.H. Bresee, Director, Planning and Building Department, The Corporation of the City of Sarnia to T. Gebrezghi, P.Eng., Supervisor, Environmental Approvals Branch, MOE, re: Application for Approval of Waste Disposal Site, Application of Non Hazardous (Liquid) Waste class, City of Sarnia, County of Lambton, MOE Ref: 7211-8XCR2A.
29. Email dated December 18, 2012 [10:53 A.M.] from David Kidd, Curran Recycling Ltd. to Lucie Guichelaar, MOE, re: Approval No. A620166, including supporting documentation.
30. Email dated January 7, 2013 [1:50 P.M.] from David Kidd, Curran Recycling Ltd. to Lucie Guichelaar, MOE regarding additional information requested by the Ministry.
31. Email dated January 14, 2013 [2:18 P.M.] from David Kidd, Curran Recycling Ltd. to Lucie Guichelaar, MOE regarding additional information requested by the Ministry.

SCHEDULE "B"

This Schedule forms part of the Environmental Compliance Approval #A620166 and defines the list of materials to be accepted at the Site.

The following materials have been approved for acceptance at the Site:
Concrete, asphalt, shingles (non asbestos type), brick and block, brush and stumps, scrap metals, clean wood (excluding painted or laminated wood), Soil (as defined in this Approval), cardboard, paper, Rock (as defined in this Approval), glass, plastic, rubber and spent lime.

SCHEDULE "C"

This Schedule "C" forms part of this Environmental Compliance Approval :

Additional Monitoring Parameters for Incoming Waste*

Waste Class 111 to 114: pH, TCLP Metals, TCLP Anions and TCLP for known or suspected contaminants.

Waste Class 121 to123: pH, TCLP Metals, TCLP Anions and TCLP for known or suspected contaminants.

Waste Class 131 to 135: pH, TCLP Metals, TCLP Anions and TCLP for known or suspected contaminants.

Waste Class 141 to 150: pH, Flash Point test, TCLP Metals, TCLP Anions and TCLP for known or suspected contaminants.

Waste Class 211 to 213: pH, Flash Point test, TCLP Volatile Organic Compounds and TCLP for known or suspected contaminants, PCB if suspected or known.

Waste Class 231 to 233: pH, Flash Point test and TCLP for known or suspected contaminants, PCB if suspected or known.

Waste Class 241 to 243: pH, Flash Point test and TCLP for known or suspected contaminants, PCB if suspected or known.

Waste Class 251 to 254: pH, Flash Point test, TCLP Volatile Organic Compounds and TCLP for known or suspected contaminants, PCB if suspected or known.

Waste Class 261 to 270: pH, Flash Point test and TCLP for known or suspected contaminants, PCB if suspected or known.

Waste Class 281 to 282: pH, Flash Point test, TCLP Volatile Organic Compounds and TCLP for known or suspected contaminants, PCB if suspected or known.

Waste from Hydro Excavating Operations (HEO) consisting of soil that has been mixed with water. Existing TCLP analysis for the soil which indicates that the soil is non-hazardous may be used to classify the resulting soil / water mixture if potable water is used in the process.

Waste from the infiltration of groundwater into an excavation creating a liquid industrial waste consisting of a mixture of soil and groundwater can be classified in accordance with existing TCLP analysis for the soil at the site.

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

The reason for Condition 1 is to simplify the wording of the subsequent conditions and define the specific meaning of terms as used in this Environmental Compliance Approval.
The reason for Conditions 2, 3, 4, 6, 7, 8, 9, 10, 11, 12, 19, and 20 is to clarify the legal rights and responsibilities of the Owner and Operator.
The reason for Conditions 5, 40, 60 and 61 is to ensure that the Site is operated in accordance with the application and supporting documentation submitted by the Owner, and not in a manner which the Director has not been asked to consider.
The reasons for Condition 13 is 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.
The reasons for Condition 14 are 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 Environmental Compliance Approval.
The reason for Condition 15, 16 and 17 is to ensure that sufficient funds are available to the Ministry to clean up the Site in the event that the Owner is unable or unwilling to do so.
The reason for Condition 18 is to ensure that appropriate Ministry staff have ready access to the Site for inspection of facilities, equipment, practices and operations

required by the conditions in this Environmental Compliance Approval. This condition is supplementary to the powers of entry afforded a Provincial Officer pursuant to the EPA and OWRA.

The reason for Condition 21 is to ensure the availability of record drawings for inspection and information purposes.

The reason for Conditions 22, 23, 24, 34, 41, 42, 43, 44, 45, 46, 47, 49, 50, 51, 62 and 63 is to ensure that the Site is operated in a manner which does not result in a nuisance or a hazard to the health and safety of the environment or people.

The reasons for Conditions 25, 26, 27, 28, 29 and 30 are to specify the approved service area from which waste may be accepted at the Site, the types of waste that may be accepted at the Site, the amounts of waste that may be stored at the Site and the maximum rate at which the Site may receive waste based on the Owner's application and supporting documentation.

The reason for Condition 31 is to specify the hours of operation for the Site.

The reason for Condition 32 is to ensure the controlled access and integrity of the Site by preventing unauthorized access when the Site is closed and no site attendant is on duty.

The reason for Condition 33 is to ensure that users of the Site are fully aware of important information and restrictions related to Site operations and access under this Environmental Compliance Approval.

The reason for Conditions 35, 36, 37, 38 and 39 is to ensure that all wastes are properly classified to ensure that they are managed, processed and disposed in accordance with O. Reg. 347, R.R.O. 1990 and in a manner that protects the health and safety of people and the public.

The reason for Condition 48. is to ensure that groundwater monitoring and surface water monitoring are carried out in accordance with Environmental Compliance Approval (Industrial Sewage Works) Number 4652-6BCR6Lto ensure that the Site is operated in a manner which does not result in a nuisance or a hazard to the health and safety of the environment or people.

The reason for Condition 52 and 53 is to ensure that the Site is operated by properly Trained staff in a manner which does not result in a hazard or nuisance to the natural environment or any person.

The reason for Condition 54 is to ensure that any complaints regarding Site operations at the Site are responded to in a timely manner.

The reasons for Conditions 55, 56, 57 and 58 is to ensure that a Spill Contingency and Emergency Response Plan is developed and maintained at the Site and that staff are properly trained in the operation of the equipment used at the Site and emergency response procedures.

The reasons for Condition 64 is to provide for the proper assessment of effectiveness and efficiency of site design and operation, their effect or relationship to any nuisance or environmental impacts, and the occurrence of any public complaints or concerns.

Record keeping is necessary to determine compliance with this Environmental Compliance Approval, the EPA and its regulations.

The reasons for Condition 65 are to ensure that regular review of site development, operations and monitoring data is documented and any possible improvements to site design, operations or monitoring programs are identified. An annual report is an important tool used in reviewing site activities and for determining the effectiveness of site design.
The reasons for Condition 66, 67 and 68 is to ensure that the Site is closed in accordance with Ministry standards and to protect the health and safety of the public and the environment.
The reason for Conditions 69, 70 and 71 are to ensure that all wastes are properly classified to ensure that they are managed, processed and disposed in accordance with Reg. 347 and in a manner that protects the health and safety of people and the public.
The reason for Conditions 72, is to ensure that the Site is operated in a manner which does not result in a nuisance or a hazard to the health and safety of the environment or people.

Upon issuance of the environmental compliance approval, I hereby revoke Approval No(s). A620166 issued on March 7, 2013

In accordance with Section 139 of the *Environmental Protection Act,* you may by written notice served upon me and the Ontario Land Tribunal within 15 days after receipt of this notice, require a hearing by the Tribunal. 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.

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:

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 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.oltt.gov.on.ca

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

DATED AT TORONTO this 24th day of August, 2025

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

AT/
c: District Manager, MECP Sarnia
N/A, Curran Recycling Ltd.