

AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 2358-DQWJF9

Issue Date: February 12, 2026

The Corporation of the City of St. Thomas
545 Talbot Street
St. Thomas, Ontario
N5P 3V7

Site Location: St. Thomas WPCP
40359 Bush Line
St. Thomas City, County of Elgin
N5P 3S9

*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:*

- one (1) carbon absorption odour control system, designated OCU-1, used to control emissions from the two (2) Aerated Sludge Storage Tanks, discharging to the air at a maximum volumetric flow rate of 2.4 cubic metre per second through a stack having an exit diameter of 0.15 metre, extending 14.0 metres above grade, consisting of the following operating in series:
- one (1) biofilter, designated OCU-2, used to control emissions from the fertilizer storage tank, Lystek vessel and dewatering press, equipped with 31.3 cubic metres of inorganic filter media, operating with an empty bed residence time of 45 seconds, discharging to the air at a maximum volumetric flow of 0.69 cubic metre per second through a stack, having an exit diameter of 0.30 metre, extending 10.0 metres above grade;
- one (1) natural gas fired emergency generator, designated GEN-2, having a rating of 50 kilowatts, discharging to the air through a stack, having an exit diameter of 0.07 metre, extending 3.0 metres above grade;
- one (1) natural gas fired boiler, designated B-1, located in the Lystek Building, having a maximum thermal input rating of 4,155,645 kilojoules per hour, discharging to the air through a stack, having an exit diameter of 0.30 metre, extending 8.5 metres above grade;
- one (1) natural gas fired boiler, designated B-2, located in the Centrifuge Building, having a maximum thermal input rating of 1,583,000 kilojoules per hour, discharging to the air through a stack, having an exit diameter of 0.15 metre, extending 8.2 metres above grade;
- two (2) above ground storage tanks for the storage of ferric chloride and

potassium hydroxide; and

- maintenance welding activities;

all in accordance with the Application for an Approval, dated June 06, 2025 and signed by John Mansell, Manager of Pollution Control of the Company and all information and documentation associated with the application including the Emission Summary and Dispersion Modelling Report prepared by R.V. Anderson Associates Limited dated June 09, 2025 and signed by Del Bosco, the email update provided by Del Bosco of R.V. Anderson Associates Limited on February 02, 2026; and the Acoustic Assessment Report prepared by R.V. Anderson Associates Limited, dated October 30, 2025 and signed by Bernardo Majano and Tyler Del Bosco.

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

1. "Acoustic Assessment Report" means the report, prepared in accordance with Publication NPC-233 submitted in support of the application, that documents all sources of noise emissions and Noise Control Measures present at the Facility. "Acoustic Assessment Report" also means the Acoustic Assessment Report prepared by R.V. Anderson Associates Limited, dated October 30, 2025 and signed by Bernardo Majano and Tyler Del Bosco;
2. "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;
3. "Acoustic Audit Report" means a report presenting the results of an Acoustic Audit, prepared in accordance with Publication NPC-233;
4. "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;
5. "AERMOD" means the dispersion model developed by the American Meteorological Society/U.S. Environmental Protection Agency Regulatory Model Improvement Committee (AERMIC) including the PRIME (Plume Rise Model Enhancement) algorithm;
6. "Approval" means this Environmental Compliance Approval, including the

application and supporting documentation listed above;

7. "Biofilter" means a source designated as OCU-2 described in the Company's application, this Approval and in the supporting documentation submitted with the application, to the extent approved by this Approval;
8. "Company" means The Corporation of the City of St. Thomas, that is responsible for the construction or operation of the Facility and includes any successors and assigns;
9. "Director" means a person appointed for the purpose of section 20.3 of the EPA by the Minister pursuant to section 5 of the EPA;
10. "District Manager" means the District Manager of the appropriate local district office of the Ministry, where the Facility is geographically located;
11. "EPA" means the Environmental Protection Act, R.S.O. 1990, c.E.19, as amended;
12. "Equipment" means the equipment and processes described in the Company's application, this Approval and in the supporting documentation submitted with the application, to the extent approved by this Approval;
13. "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 Del Bosco, R. V. Anderson Associates Limited and dated June 09, 2025 submitted in support of the application, and includes any changes to the report made up to the date of issuance of this Approval;
14. "Exhausted" means the capacity of the carbon filter media to adsorb odour and hydrogen sulphide emissions is reached and the carbon adsorption unit is not longer able to effectively reduce odour and hydrogen sulphide emissions;
15. "Facility" means the entire operation located on the property where the Equipment is located;
16. "Independent Acoustical Consultant" means an Acoustical Consultant who is not representing the Company and was not involved in preparing the Acoustic Assessment Report or the design/implementation of Noise Control Measures for the Facility and/or Equipment. The Independent Acoustical Consultant shall not be retained by the Acoustical Consultant involved in the noise impact assessment or the design/implementation of Noise Control Measures for the Facility and/or Equipment;
17. "Manager" means the Manager, Technology Standards Section, Technical Assessment and Standards Development Branch, or any other person who represents and carries out the duties of the Manager, Technology Standards Section, Technical Assessment and Standards Development Branch, as those

duties relate to the conditions of this Approval;

18. "Manual" means a document or a set of documents that provide written instructions to staff of the Company;
19. "Minister" means the Minister of the Environment, Conservation and Parks or such other member of the Executive Council as may be assigned the administration of the EPA under the Executive Council Act;
20. "Ministry" means the ministry of the Minister;
21. "Noise Control Measures" means measures to reduce the noise emission from the Facility and/or Equipment including, but not limited to silencers, acoustic louvres, enclosures, absorptive treatment, plenums and barriers;
22. "O. Reg. 419/05" means the Ontario Regulation 419/05, Air Pollution – Local Air Quality;
23. "Point of Impingement" has the same meaning as in section 2 of O. Reg. 419/05;
24. "Pre-Test Plan" means a plan for the Source Testing including the information required in Section 5 of the Source Testing Code;
25. "Procedure Document" means Ministry guidance document titled "Procedure for Preparing an Emission Summary and Dispersion Modelling Report" dated March 2018, as amended;
26. "Publication NPC-103" means the Ministry Publication NPC-103 of the Model Municipal Noise Control By-Law, Final Report, August 1978, published by the Ministry as amended;
27. "Publication NPC-233" means the Ministry Publication NPC-233, Information To Be Submitted For Approval of Stationary Sources Of Sound, October, 1995, as amended;
28. "Publication NPC-300" means the Ministry Publication NPC-300, "Environmental Noise Guideline, Stationary and Transportation Sources – Approval and Planning, Publication NPC-300", August 2013, as amended;
29. "Sensitive Receptor" means any location where routine or normal activities occurring at reasonably expected times would experience adverse effect(s) from odour discharges from the Facility, including one or a combination of:
 - a. private residences or public facilities where people sleep (e.g.; single and multi-unit dwellings, nursing homes, hospitals, trailer parks, camping grounds, etc.),
 - b. institutional facilities (e.g; schools, churches, community centres, day care centres, recreational centres, etc.),
 - c. outdoor public recreational areas (e.g.; trailer parks, play grounds, picnic

areas, etc.), and

d. commercial areas where there are continuous public activities (e.g.; commercial plazas and office buildings);

30. "Source Testing" means site-specific sampling and testing to measure emissions resulting from operating the Carbon Absorption Odour Control System (OCU-1) and Biofilter (OCU-2) under operating conditions that will derive an emission rate that, for the relevant averaging period of the contaminant, is at least as high as the maximum emission rate that the source of contaminant is reasonably capable of, or a rate approved by the Manager within the approved operating range of the Biofilters which satisfies paragraph 1 of subsection 11(1) of O. Reg. 419/05; and
31. "Source Testing Code" means the Ontario Source Testing Code, dated June 2010, prepared by the Ministry, as amended.

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. OPERATION AND MAINTENANCE

1. The Company shall ensure that the Equipment is properly operated and maintained at all times. The Company shall:
 - a. prepare, not later than three (3) months after the date of this Approval, and update, as necessary, a Manual outlining the operating procedures and a maintenance program for the Equipment, including:
 - i. routine operating and maintenance procedures in accordance with good engineering practices and as recommended by the Equipment suppliers;
 - ii. emergency procedures, including spill clean-up procedures;
 - iii. procedures for any record keeping activities relating to operation and maintenance of the Equipment;
 - iv. all appropriate measures to minimize noise and odorous emissions from all potential sources;
 - v. procedures to monitor the performance of the Biofilters, including but not limited to parameters and the frequency of monitoring those parameters;
 - vi. the frequency of inspection, cleaning and replacement of the filter

- material in the Biofilters;
 - vii. the frequency of inspection and replacement of the activated carbon in the carbon adsorption unit; and
 - viii. a list of trained personnel responsible for the operation and maintenance of the Equipment/Facility;
- b. implement the recommendations of the Manual.
2. The Company shall ensure that the activated carbon in the carbon adsorption unit is replaced before it is Exhausted.

2. MONITORING

1. The Company shall monitor and record the physical parameters of the Biofilters as outlined in Schedule A.

3. SOURCE TESTING

1. The Company shall perform Source Testing in accordance with the procedures in Schedule B to determine the rates of emissions of odour and hydrogen sulphide from the Carbon Absorption Odour Control System (OCU-1) and Biofilter (OCU-2).

4. RECORD RETENTION

1. The Company shall retain, for a minimum of two (2) years from the date of their creation, all records and information related to or resulting from the recording activities required by this Approval, and make these records available for review by staff of the Ministry upon request. The Company shall retain:
 - a. all records on the maintenance, repair and inspection of the Equipment;
 - b. all records of monitoring of the physical parameters of the Biofilter;
 - c. all records of the Source Testing; and
 - d. all records of any environmental complaints, including:
 - i. a description, time and date of each incident to which the complaint relates;
 - ii. wind direction at the time of the incident to which the complaint relates; and
 - iii. a description of the measures taken to address the cause of the incident to which the complaint relates and to prevent a similar occurrence in the future.

5. NOTIFICATION OF COMPLAINTS

1. The Company shall notify the District Manager, in writing, of each environmental complaint within two (2) business days of the complaint. The notification shall include:
 - a. a description of the nature of the complaint; and
 - b. the time and date of the incident to which the complaint relates.

6. NOISE

1. The Company shall, at all times, ensure that the noise emissions from the Facility comply with the limits set in Ministry Publication NPC-300.
2. The Company shall restrict the operation of the shipping / receiving trucks to the hours from 7 a.m. to 11 p.m.
3. The Company shall restrict the periodic testing of the emergency generator to the daytime hours from 7 a.m. to 7 p.m.

7. ACOUSTIC AUDIT

1. The Company shall carry out Acoustic Audit measurements on the actual noise emissions due to the operation of the Facility. 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 twelve (12) months after the commissioning of the Carbon Absorption Odour Control System (OCU-1) and the Biofilter (OCU-2).
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.

8. CHANGE OF OWNERSHIP

1. The Company shall notify the Director in writing, and forward a copy of the notification to the District Manager, within thirty (30) days of the occurrence of any of the following changes to Facility operations:
 - a. the ownership of the Facility;
 - b. the operator of the Facility;
 - c. the address of the Company;

- d. the partners, where the Company is or 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 Company 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.
2. In the event of any change in ownership of the Facility, the Company shall notify the successor of the existence of this Approval and provide the successor with a copy of this Approval, and the Company shall provide a copy of the notification to the District Manager and the Director.

SCHEDULE A

Biofilter Parameters, to be monitored and recorded

The Company shall monitor and record the operating parameters of the Biofilter, through a combination of sensors, meters, physical probes or equivalent means, as recommended by the supplier of the Biofilter. In the development of the monitoring program for the Biofilters, the following physical parameters and monitoring frequency shall be considered for each Biofilter:

1. pressure drop across the Biofilter bed (kilopascals), daily to weekly;
2. process air flow through the Biofilter (cubic metres per second), daily;
3. Biofilter bed moisture (percent), weekly;
4. Biofilter bed temperature (degrees Celsius), hourly to daily;
5. inlet air temperature after the pre-humidification chamber (degrees Celsius), hourly to daily;
6. inlet air relative humidity after the pre-humidification chamber (percent), daily
7. pH of water run-off from Biofilter bed, monthly; and
8. water flow in the pre-humidification chamber and the media irrigation system, daily.

SCHEDULE B

Source Testing Procedures

1. The Company shall submit, not later than three (3) months after successful

commissioning of Carbon Absorption Odour Control System (OCU-1) and Biofilter (OCU-2), to the Manager a Pre-Test Plan for the Source Testing required under this Approval. 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 agreed to or directed by the 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 (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 weather conditions such as ambient temperature and relative humidity, wind speed and direction, and any environmental complaints if received, at the time of the Source Testing;
 4. records of operating conditions at the time of Source Testing, including but not limited to the following:
 - a. production data and equipment operating rate as a percentage of maximum capacity;
 - b. Facility/process information related to the operation of the Biofilter;
 - c. description of the emission sources controlled by the Biofilter at the time of testing;
 5. results of Source Testing, including the emission rate, emission concentration, and relevant emission factor of odour and hydrogen sulphide from the Carbon Absorption Odour Control System (OCU-1) and Biofilter (OCU-2);

6. a tabular comparison of calculated emission rates and emission factors based on Source Testing results for odour and hydrogen sulphide to relevant estimates described in the ESDM Report, and
 7. the results of dispersion calculations, taking into account all odour and hydrogen sulphide sources at the Facility, using the average of the results of the Source Testing, to indicate the maximum 10-minute concentration of odour and hydrogen sulphide at the Point of Impingement and the most impacted Sensitive Receptor computed in accordance with Schedule C.
6. The Director may not accept the results of the Source Testing if:
1. the Source Testing Code or the requirement of the Manager were not followed;
 2. the Company did not notify the Manager, the District Manager and Director of the Source Testing; or
 3. the Company failed to provide a complete report on the Source Testing.
7. If the Director does not accept the result 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. The Company shall update their ESDM Report in accordance with Section 26 of O. Reg. 419/05 and the Procedure Document with the results from the Source Testing if any of the calculated emission factors or calculated emission rates are higher than the predicted rates in the ESDM Report, not later than three (3) months after the submission of the Source Testing report and make these records available for review by staff of the Ministry upon request.

SCHEDULE C

Procedure to calculate and record the 10-minute average concentration of odour and hydrogen sulphide at the Point of Impingement and at the most impacted Sensitive Receptor

1. Calculate and record one-hour average concentration of odour and hydrogen sulphide at the Point of Impingement and at the most impacted Sensitive

Receptor, employing the AERMOD atmospheric dispersion model or any other model acceptable to the Director, that employs at least five (5) years of hourly local meteorological data and that can provide results reported as individual one-hour average odour and hydrogen sulphide concentrations;

2. Convert and record each of the one-hour average concentrations predicted over the five (5) years of hourly local meteorological data at the Point of Impingement and at the most impacted Sensitive Receptor to 10-minute average concentrations using the One-hour Average to 10-Minute Average Conversion described below; and
3. Record and present the 10-Minute Average concentrations predicted to occur over a five (5) year period at the Point of Impingement and at the most impacted Sensitive Receptor in a histogram. The histogram shall identify all predicted 10-minute average odour and hydrogen sulphide concentration occurrences in terms of frequency, identifying the number of occurrences over the entire range of predicted odour and hydrogen sulphide concentration in increments of not more than 1/10 of one odour and hydrogen sulphide unit/concentration. The maximum 10-minute average concentration of odour and hydrogen sulphide at the Sensitive Receptor will be considered to be the maximum odour and hydrogen sulphide concentration at the most impacted Sensitive Receptor that occurs and is represented in the histogram, disregarding outlying data points on the histogram as agreed to by the Director.
4. Use the following formula to convert and record one-hour average concentrations at the Point of Impingement and at the most impacted Sensitive Receptor to 10-minute average concentrations:

$$X_{10min} = X_{60min} * 1.65$$

where X_{10min} = 10-minute average concentration

X_{60min} = one-hour average concentration

(Equation: X Subscript 10min Baseline equals X Subscript 60min Baseline times 1.65, where X Subscript 10min Baseline equals 10-minute average concentration and X Subscript 60min Baseline equals one-hour average concentration.)

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

1. Condition No. 1 is included to emphasize that the Equipment must be maintained and operated according to a procedure that will result in compliance with the EPA, the Regulations and this Approval.
2. Conditions No. 2 and 3 are included to require the Company to gather accurate information so that the environmental impact and subsequent compliance with the EPA, the regulations and this Approval can be verified.

3. Condition No. 4 is included to require the Company to keep records and to provide information to staff of the Ministry so that compliance with the EPA, the Regulations and this Approval can be verified.
4. Condition No. 5 is included to require the Company to notify staff of the Ministry so as to assist the Ministry with the review of the site's compliance.
5. Condition No. 6.1 is included to provide the minimum performance requirements considered necessary to prevent an adverse effect resulting from the operation of the Facility.
6. Condition No. 6.2 is included to ensure that the operation of the shipping / receiving trucks is not extended beyond the stated hours to prevent an adverse effect resulting from the operation of the Equipment.
7. Condition No. 6.3 is included to ensure that the periodic testing of the emergency generator, excluding emergency situations, is not extended beyond the specified hours to prevent an adverse effect resulting from the operation of the Equipment.
8. Condition No. 7 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 this Approval can be verified.
9. Condition No. 8 is included to require the Company to notify/report to the Ministry so that compliance with the EPA, the regulations and this Approval can be verified.

Upon issuance of the environmental compliance approval, I hereby revoke Approval No(s). 7310-BWYGMC issued on March 3, 2021

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 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 available 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.olt.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 12th day of February,
2026

Nancy E Orpana, P.Eng.
Director
appointed for the purposes of Part II.1 of the
Environmental Protection Act

BS/
c: District Manager, MECP London - District
Tyler Del Bosco, R.V. Anderson Associates Limited