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CONSULTING

HOME OPPORTUNITIES

Air Quality Impact Study

280 Clair Road West, Guelph, Ontario

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1.0

Introduction

1.1

Purpose and Objectives

Dillon Consulting Limited (Dillon) was retained by Home Opportunities Non-Profit Corporation (Home Opportunities) to complete an Air Quality Impact Study for the proposed development located at 280 Clair Road West in Guelph, Ontario (Proposed Development). This study has been completed in support of an Official Plan Amendment (OPA) and Zoning By-Law Amendment (ZBA) application for the Proposed Development.

The purpose of this study is to investigate the potential for regulatory and nuisance impacts on the Proposed Development resulting from air emission sources (including odour and dust) located on surrounding land uses.

The study was conducted in consideration of the following documents:

- The Provincial Policy Statement (PPS), 2020;
- The Ontario Environmental Protection Act (EPA);
- MECP's D-Series of Guidelines for land use compatibility between industrial and sensitive land uses; and
- The MECP's local air quality regulation, Ontario Regulation 419/05.

2.0

Description of Site and Surrounding Area

The Proposed Development is located on a vacant lot at 280 Clair Road West. The lands occupied by the lot are currently zoned as Industrial (B) and Natural Heritage System (NHS), per the City of Guelph's Zoning Bylaw (2023)-20790. The development will consist of:

- Tower A: Consisting of an 8-storey building adjacent to a 16-storey building;
- Tower B: Consisting of a 7-storey building adjacent to a 14-storey building;
- 15 multi-plex houses (8-, 9-, and 12-plex); and
- 16 sets of stacked townhomes (between 6 and 12 units per stack).

The subject site and surrounding area are shown in **Figure 1 (appended)**. The Site Plan for the Proposed Development is provided in **Appendix A**.

2.1

Zoning

Per the City of Guelph's Zoning Bylaw (2023)-20790, the development area's surroundings include:

- Industrial (B), Natural Heritage System (NHS), and Low Density Residential (RL) zones to the north;
- Natural Heritage System (NHS), Open Space (OS), and Neighbourhood Institutional (NI) zones to the east;
- Industrial (B) and Natural Heritage System (NHS) zones to the south; and
- Industrial (B) zones to the west.

A copy of the City of Guelph's interactive zoning map of the surrounding area is provided in **Appendix B**.

3.0

Summary of Relevant Land Use Policies, Regulations, and Guidelines

The following documents and guidelines were considered in the Assessment:

- The Provincial Policy Statement (PPS), 2020;
- The Ontario Environmental Protection Act (EPA);
- The MECP's D-Series of Guidelines for land use compatibility between industrial and sensitive land uses; and
- The MECP's local air quality regulation, Ontario Regulation 419/05.

3.1

Provincial Policy Statement

The latest update to the Provincial Policy Statement (PPS) was issued under Section 3 of the Planning Act and came into effect May 1, 2020. The PPS provides policy direction on matters of provincial interest related to land use planning and development. The update to the PPS supports the government's goals related to increasing housing, supporting jobs, and reducing red tape.

The PPS states under Part V Section 1.2.6:

“1.2.6.1 Major facilities and sensitive land uses shall be planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential adverse effects from odour, noise, and other contaminants, minimize risk to public health and safety, and to ensure the long-term operational and economic viability of major facilities in accordance with provincial guidelines, standards and procedures.

1.2.6.2 Where avoidance is not possible in accordance with policy 1.2.6.1, planning authorities shall protect the long-term viability of existing or planned industrial, manufacturing or other uses that are vulnerable to encroachment by ensuring that the planning and development of proposed adjacent sensitive land uses are only permitted if the following are demonstrated in accordance with provincial guidelines, standards and procedures:

- there is an identified need for the proposed use;*
- alternative locations for the proposed use have been evaluated and there are no reasonable alternative locations;*
- adverse effects to the proposed sensitive land use are minimized and mitigated; and*
- potential impacts to industrial, manufacturing or other uses are minimized and mitigated.”*

At the time of this assessment, the Ontario government has released the Provincial Planning Statement, 2024 (2024 PPS) which will come into effect October 20, 2024. The 2024 PPS replaces the 2020 PPS and A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019. It is our understanding that the released 2024 PPS does not materially affect the land use compatibility assessment process.

3.2 Environmental Protection Act

The Ontario Environmental Protection Act (EPA) provides a framework under which industrial compliance and land use compatibility are assessed. With respect to land use compatibility, the EPA provides direction that:

1. Under Section 9 of the EPA, all regulated industrial and commercial facilities must apply for and obtain approval for any activities that may cause or results in contaminants to be discharged to the natural environment, as described in regulations 419/05 and 1/17.
2. Under Section 14 of the EPA, a person shall not discharge a contaminant or cause or permit the discharge of a contaminant into the natural environment, if the discharge causes or may cause an adverse effect. Adverse effects are defined within the EPA as:

“one or more of,

- a. impairment of the quality of the natural environment for any use that can be made of it,*
- b. injury or damage to property or to plant or animal life,*
- c. harm or material discomfort to any person,*
- d. an adverse effect on the health of any person,*
- e. impairment of the safety of any person,*
- f. rendering any property or plant or animal life unfit for human use,*
- g. loss of enjoyment of normal use of property, and*
- h. interference with the normal conduct of business;”*

The EPA’s definition of a contaminant includes but is not limited to; air contaminants, odours, noise, and vibration, and has been determined in past decisions to include light. Obtaining approval for air and noise requires that a facility demonstrate, through a technical assessment, compliance with the applicable guidelines and regulations such as Ontario Regulation 419/05 and NPC-300.

The adverse effect clause in the EPA is applicable to the assessment of nuisance complaints in a land use compatibility context. Nuisance contaminants, such as dust and odour, may result in complaints which may be determined to fall under the adverse effects clause. When considering land use changes which may introduce new sensitive receptors in an area, it is important to consider a facility’s current Environmental Permissions (i.e., Environmental Compliance Approval or Environmental Activity and Sector Registry approval) as well as the potential for their operations to result in a nuisance impact.

3.3 D-Series Guidelines

The intent of the MECP's D-Series of Guidelines is to minimize or prevent, through the use of buffers and separation of uses, the encroachment of incompatible land uses. Guideline D-6 delegates responsibility to the planning authorities and requires that they be followed where there is potentially encroachment of sensitive land uses to existing industrial lands and vice versa.

With respect to Guideline D-6, sensitive receptors include: residences, senior-citizen homes, schools, day care facilities, hospitals, and churches or similar institutional uses, as well as recreation areas deemed by the planning authority to be sensitive. Certain commercial and institutional uses may be deemed sensitive on a case-by-case basis and based on typical operating hours.

Guideline D-6 includes potential Area of Influences (AOI) and recommended Minimum Separation Distances (MSD) based on three industrial classifications (i.e., Class I, Class II, and Class III). The AOI is the area within which adverse effects from an industry **may be experienced** at a sensitive receptor. It also represents the area between an industry and sensitive receptors within which technical studies can be performed to demonstrate the uses are compatible prior to approval. These studies may include air dispersion modelling to determine the actual influence area, which is defined by Guideline D-6 as the overall range within which an adverse effect **would be or is experienced**. Should the actual influence area intersect with the proposed use, further detailed assessment may be required to assess compatibility and determine mitigative solutions, as required.

The MSD from an industry represents the area within which adverse effects to a sensitive land use are likely to occur. Developing a sensitive land use within an industry's MSD requires detailed technical studies (e.g., air dispersion modelling) to demonstrate that the land uses are compatible. The MSD was established based on MECP studies and historical complaint data.

The Guideline D-6 Industrial Categorization Criteria, AOI, and MSD are based on Industry Class and are discussed further in **Section 4.0**.

3.4 Ontario Regulations 419/05 and 1/17 – Local Air Quality

The MECP's environmental permissions framework includes Environmental Compliance Approvals (ECA) issued under Section 9 of the EPA and following the requirements of Ontario Regulation 419/05 (O. Reg. 419/05), and the Environmental Activity and Sector Registry (EASR) registrations under Section 9 of the EPA and following the requirements of Ontario Regulation 1/17 (O. Reg. 1/17). The applicability of the two instruments (ECA and EASR) is based on the facility's industrial classification. Both instruments provide the same level of environmental protection; the EASR approach allows less-intensive industries to follow a streamlined registration process.

Both environmental permission mechanisms require the same supporting technical studies and assessment, and for the purpose of this report will collectively be referred to as “Environmental Permissions”. The Environmental Permissions process provides a framework under which industries are required to assess the potential impact of their sources of air quality (including dust, and odour), noise, and vibration emissions.

The MECP requires any industry applying for Environmental Permissions to perform an assessment of air emissions as described in O. Reg. 419/05 and associated guidance documents. O. Reg. 419/05 outlines the requirements of the technical assessment and provides contaminant-specific air quality standards to be applied. All contaminants are required to meet these standards at all points off-site, while nuisance contaminants such as odours are regulated at sensitive receptors such as residences, schools, and places of worship.

The implications of O. Reg. 419/05 from a land use compatibility perspective are:

- All industries which operate in compliance with an approval should meet the air quality standards for regulated contaminants at all points off-site which are allowed under current zoning, regardless of existing land use. Industries do not have to demonstrate compliance for elevated receptors that have not been approved to build.
- Land use assessments would not consider ambient air quality (i.e., the ambient concentration of contaminants without the influence of the industry) or cumulative air quality effects (i.e., concentrations of contaminants accumulated from multiple industrial sources).
- Zoning changes to allow for elevated receptors in an area may impose new regulatory obligations for existing industries and can lead to compliance issues, as such locations would not have been assessed during the regulatory application process. Land use compatibility assessments should consider the potential impact on a facility’s existing Environmental Permission.
- Existing industries are not required to meet nuisance impact limits for, fugitive dust and odour, at lands which are not zoned for sensitive uses. Where zoning changes are proposed, a land use compatibility study (as described in the D-Series Guidelines section) should be performed to determine compatibility.

4.0 Industry Classification within the Surrounding Area

Industries in proximity to the Proposed Development were classified based on the MECP Guideline D-6 industrial categorization criteria. A summary of the classification criteria and corresponding setback distances is provided below. The assigned classifications for the industries in proximity to the Proposed Development are provided in **Section 4.2**.

4.1 MECP Guideline D-6 Industrial Classifications

The industrial categorization criteria presented in Appendix A of Guideline D-6 is provided in **Table 1**. Note that the examples provided in this table should not be considered a comprehensive list but are to be used as examples of each industrial category. Additionally, the examples listed in **Table 1** may not apply to all instances of a particular industry type; for example, some electronics manufacturing and repair facilities may meet the definition of a Class I or Class II facility.

Table 1: Industrial Categorization Criteria

Class	Outputs	Scale	Process	Operations / Intensity	Possible Examples
I	Noise: Sound not audible off property. Dust and/or Odour: Infrequent and not intense. Vibration: No ground borne vibration on plant property.	No outside storage. Small scale plant or scale is irrelevant in relation to all other criteria for this Class.	Self-contained plant or building which produces/stores a packaged product. Low probability of fugitive emissions.	Daytime operations only. Infrequent movement of products and/or heavy trucks.	Electronics manufacturing and repair. Furniture repair and refinishing. Beverages bottling. Auto parts supply.
II	Noise: Sound occasionally audible off property. Dust and/or Odour: Frequent and occasionally intense. Vibration: Possible ground-borne vibration but cannot be perceived off property.	Outside storage permitted. Medium level of production allowed.	Open process. Periodic outputs of minor annoyance. Low probability of fugitive emissions.	Shift operations permitted. Frequent movement of products and/or heavy trucks with the majority of movements during daytime hours.	Magazine printing. Paint spray booths. Metal command. Electrical production manufacturing. Manufacturing of dairy products.

Class	Outputs	Scale	Process	Operations / Intensity	Possible Examples
III	Noise: sound frequently audible off property. Dust and/or Odour: Persistent and/or intense. Vibration: Ground-borne vibration can frequently be perceived off property.	Outside storage of raw and finished products. Large production levels.	Open process. Frequent outputs of major annoyances. High probability of fugitive emissions.	Continuous movement of products and employees. Daily shift operations permitted.	Manufacturing of paint and varnish. Organic chemicals manufacturing. Solvent recovery plants. Metal manufacturing.

A noise assessment has been completed for the Proposed Development under a separate report cover. This assessment only pertains to air quality impacts including dust and odour, and as such, existing industries surrounding the Proposed Development were classified using the MECP's Guideline D-6 Industrial Categorization Criteria from an air quality perspective and assessed accordingly. No consideration was given in this assessment to the potential for noise and vibration impacts from the surrounding industries.

4.1.1 Industry Setback Distances

The potential Area of Influence (AOI) and recommended Minimum Separation Distance (MSD) for each industry class as defined by the D-Series Guidelines are provided in **Table 2**. The described distances vary for Class I, II, and III industries due to the frequency and magnitude of potential adverse effects.

Table 2: Industrial Classification Study Distances

Industrial Categorization	AOI (m)	MSD (m)
Class I	70	20
Class II	300	70
Class III	1000	300

4.2 Industrial Classifications for Surrounding Facilities

Dillon reviewed the area surrounding the subject site in order to classify the existing industrial and commercial lands using the MECP's D-Series framework, as well as to identify nearby vacant lands which are zoned to allow for commercial or industrial uses.

A site visit to the area was conducted by Dillon personnel on February 13, 2024 and again on September 10, 2024 to identify any significant sources of air emissions, including odour and dust. The meteorological conditions were as follows:

- February 13, 2024: Ambient temperature was approximately 0°C and the windspeed was approximately 20 km/hr from the northwest.

- September 10, 2024: Ambient temperature was approximately 20°C and the windspeed was approximately 20 km/hr from the west.

Industries were classified based on site visit observations from publicly accessible areas, consultation with industry staff, review of existing MECP approvals documents, review of emissions reported to the National Pollutant Release Inventory (NPRI), and through publicly available information. The Guelph MECP District Office was contacted to request complaint related information for the area. It was communicated to Dillon that the District Office is unable to provide complaint related information and such inquiries are to be directed using the MECP's Freedom of Information (FOI) request system. Where determined necessary, Dillon has submitted an FOI request on a per-industry basis.

Existing Class I, Class II, and Class III industries were identified within the study area. **Table 3** below summarizes the industrial and commercial facilities who's potential AOI or recommended MSD intersects with the Proposed Development. Industries where the Proposed Development is outside of the industry's AOI have not been included in **Table 3**. **Figure 2 (appended)** shows the industries identified during the assessment.

Table 3: Facilities with Proximity to Proposed Development

Facility and Address	Industrial Classification	Description of Operations/Equipment	Environmental Compliance Approval	Setback from Proposed Development	Additional Assessment Required (Yes/No, Rationale)
Denso Manufacturing Canada, 900 Southgate Dr, Guelph, ON	II	Automotive parts manufacturing, injection molding, metal forming, parts degreasing, powder coating, flame brazing, welding, assembly and testing of parts	9696-AJFHC2	0 m ^[1]	Yes Proposed Development is within the recommended MSD and potential AOI
The TDL Group Corp., 950 Southgate Road, Guelph, ON	I	Food product storage and logistics, diesel generators for peak period power generation	ECA: 1704-8W3HRC EASR: R-003-3132472017	0 m ^[1]	Yes Proposed Development is within the recommended MSD and potential AOI
Organic Meadow, 362 Laird Rd, Guelph, ON	II	Dairy products manufacturing	N/A	200 m	Yes Proposed Development is within the potential AOI
Oskam Welding & Machine Ltd., 40 Rutherford Ct, Guelph, ON	II	Custom steel fabrication (incl. welding), paint spray booth, NG-fired heating HVAC units	Certificate of Approval: 4520-7MZU7N	270 m	Yes Proposed Development is within the potential AOI
Sleeman Breweries Ltd, 551 Clair Rd W, Guelph, ON	III	Brewing, process exhaust systems, natural gas-fired boilers, welding, dust collectors, cooling towers, outdoor storage tanks	1390-8TJN9Z	700 m	Yes Proposed Development is within the potential AOI

Notes: [1] Industrial property is adjacent to Proposed Development

"N/A": Environmental Permissions not available / were not identified

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The classifications assigned and summarized below were based on the MECP's categorization criteria in **Table 1** and judgement of the assessment team with respect to air quality impacts and are valid as of the time this study was completed.

The industries in **Table 3** were sorted by the actual separation distance from the Proposed Development and assigned industrial classifications. The separation distance was considered to be the shortest length measured between property boundaries.

In the event of a facility's actual separation distance is within the MECP recommended AOI, the facility is considered to have a potential to cause adverse effects on the Proposed Development and additional assessment may be required. The need for an additional assessment or further technical study (i.e., dispersion modelling) for the facility depends on factors such as the actual separation distance, operations and emissions sources documented in the facility's Environmental Permissions, nuisances observed during the site visits, and Dillon's professional judgement and experience with similar facilities. In cases where a facility is located within the recommended MSD, an additional assessment will be required to identify the actual impacts and necessary mitigative measures per D-6 Guideline.

5.0 Air Quality, Odour, and Dust Assessment

This section describes the assessment between the Proposed Development and the land uses identified in **Section 4.0**. This assessment follows the approach outlined in Guideline D-6 and appropriate MECP guidelines and regulations.

5.1 Assessment Approach

When assessing land use compatibility from an air quality perspective, the goal is to:

- Evaluate the potential for a proposed sensitive land use to limit an industry's current and/or future operations to comply with applicable air quality (including odour and dust) standards; and
- Identify and, where appropriate, quantify potential nuisance impacts from incompatible land uses as defined in Guideline D-6 (e.g., where sensitive land uses, and industrial land uses intersect).

A determination regarding compatibility may include an assessment of frequency and severity of the expected impacts as some level of nuisance can be expected in most urban settings, even in the absence of industrial sources (e.g., residential cooking odours).

5.1.1 Air Dispersion Modelling

Where sensitive land uses are proposed within the AOI or recommended MSD of an industrial land use, detailed studies are required by Guideline D-6 to determine if an adverse impact may exist, or quantify mitigative measures, if applicable. Specifically, air dispersion modelling can be used to identify locations likely to be impacted by a facility's operations and provide an estimate of the frequency and severity of the impacts.

Regardless of whether an industry is operating under Environmental Permissions, air dispersion modelling is often required to assess air quality, dust, and odour impacts from an existing industry at new elevated receptors introduced by a proposed sensitive land use. The assessment of potential fugitive dust impacts from industries at a proposed sensitive land use may also be required as part of a technical study, especially if the dust emissions are likely to pose a health risk to humans (e.g., metals).

Where required, air dispersion modelling was performed in this assessment using version 22112 of US EPA's AERMOD air dispersion model. The air dispersion modelling performed in this assessment followed the MECP's *Guideline A-11: Air Dispersion Modelling Guideline for Ontario*. The MECP's publicly available terrain data and applicable regional pre-processed meteorological data from the London Station for "Suburban" was selected.

Where applicable, air dispersion modelling was performed using sources or emissions included in the existing Environmental Permissions and supporting documentation (where available) to assess industrial air quality impacts on the Proposed Development compared to existing receptors. In cases where no Environmental Permissions were identified for a facility, reasonable assumptions were made based on the facility type and Dillon's experience with similar facilities.

5.2 Local Meteorology

Surface meteorological dataset from the London Surface Station for the years 1996 to 2000 was used in AERMOD. The wind rose from the meteorological dataset is presented in **Figure 3**. A wind rose depicts the frequency of occurrence of winds in wind direction sectors and wind speed classes. Winds in the study area are shown to predominantly blow from the west-southwest to northwest direction.

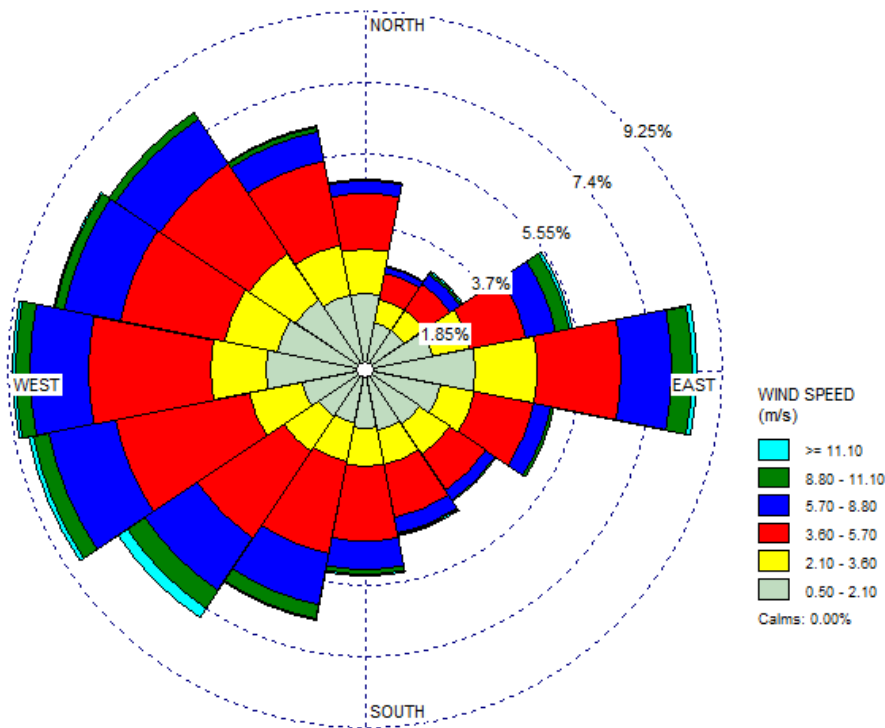


Figure 3: London Surface Station Wind Rose (1996 – 2000)

5.3 Identified Industries

As described in **Section 4.0**, the following industries with air emissions, including regulated air contaminants, odour, and/or fugitive dust, are within the AOI and/or recommended MSD of the Proposed Development:

- Denso Manufacturing Canada;
- The TDL Group Corp.;
- Organic Meadow;
- Oskam Welding & Machine Ltd.; and
- Sleeman Breweries Ltd.

An assessment with respect to air quality and/or nuisance impacts from these industries at the Proposed Development is provided in the following sections.

5.3.1 Denso Manufacturing Canada

Denso Manufacturing Canada (Denso) is an automotive heat exchanger manufacturer, including heating, ventilating, and air conditioning (HVAC) systems, radiators, and condensers. The facility is located at 900 Southgate Drive, adjacent to the western property boundary of the Proposed Development. Per the MECP's online database for Environmental Permissions, Denso operates under Environmental Compliance Approval (ECA) Number 9696-AJFHC2, dated April 11, 2017, provided in **Appendix C**. The ECA approves operation of the following processes:

- Injection molding;
- Metal forming;
- Parts degreasing;
- Powder coating;
- Auto and manual flame brazing;
- Brazing furnaces;
- Welding;
- Assembly and component testing; and
- Two regenerative thermal oxidizers treating exhaust gas from brazing lines.

With respect to the MECP Guideline D-6 industrial categorization criteria in **Table 1**, Denso appears to allow for a medium level of production, has outdoor storage tanks, and no significant sources of fugitive dust emissions. Based on site visit operations, dust and/or odour emissions appear to be infrequent and not intense. Considering these characteristics, the facility is considered as a Class II industry per the D-6 Guidelines. As the Proposed Development is within the recommended minimum separation distance of Denso, a technical assessment of regulated contaminants and nuisance impacts is required.

5.3.1.1

Information Requests

On June 19, 2024, Dillon spoke with Denso personnel over a phone call to request information regarding Denso's operations as they related to land use compatibility, communicating the purpose of Dillon's assessment in promoting compatibility with the proposed sensitive uses, as well as protect the existing industries in the area. The information requested included details which are typically summarized in a facility's Emissions Summary Dispersion Modelling (ESDM) report as outlined in the facility's ECA. The information request was summarized in an e-mail which was shared electronically with Denso personnel. In response, Dillon was provided with a copy of Denso's most recent Emission Summary Table and not the complete ESDM Report. Dillon also submitted a Freedom of Information request (FOI) to the MECP to request copies of Denso's ESDM Report as well as any records of nuisance complaints. At the time of this assessment, Dillon has not received the requested documents. A copy of the e-mail correspondence and the FOI request documentation are provided in **Appendix D**. The facility's Emission Summary Table is also provided in **Appendix D**.

5.3.1.2

Assessment Criteria

Typically, in an air quality assessment, facility emissions are modelled and compared against contaminant-specific guidelines and standards published by the MECP. As detailed emissions information was not available, Dillon performed the following assessments based on assumptions:

1. An assessment of significant contaminant emissions to determine if the introduction of the Proposed Development would impact Denso's ability to comply with their ECA; and
2. A review of potential nuisance impacts to determine if the Proposed Development would be expected to experience nuisance impacts related to dust and odour emissions from Denso.

5.3.1.3

Assessment of Significant Contaminant Emissions

All facilities in Ontario are required to meet criteria for air quality at all points at their property line and beyond. Compliance is assessed through an MECP approved receptor grid reflecting ground-level receptors, however, facilities are also required to meet at all existing and allowable elevated sensitive uses (e.g., multi-storey dwellings). Therefore, the introduction of the 3-storey multiplexes and 16- and 14-storey residential towers at the Proposed Development (i.e., operable windows and balconies) where residents may be present represent new receptor locations to the study area where Denso would be required to meet air quality criteria.

Dillon reviewed the total emission rates provided in the Emission Summary Table (EST) and the source parameters in Denso's ECA and performed air dispersion modelling to evaluate compatibility between Denso's operations and the Proposed Development. Source parameters are only provided in the ECA for the regenerative thermal oxidizers (RTOs) which are identified as sources RC-402-1A and RC-402-2. As a Source Summary Table was not provided by Denso, it was assumed that the contaminants listed in the Emission Summary Table are emitted out of the RTOs that are outlined in the ECA.

To evaluate the potential for the Proposed Development to impact Denso's ability to operate in compliance with the conditions of their ECA, the facility was modelled using the MECP's approved receptor grid as well as receptors representing elevated receptors along the facades of the Proposed Development's residential buildings.

5.3.1.4 Source Summary

A summary of the sources and contaminants obtained from the ECA and Emission Summary Table, respectively and included in the assessment is provided in **Table 4**.

Table 4: Denso Source and Contaminant Summary Table (RTO sources)

Source	Source Description per ECA	Assessed Contaminants per EST	Averaging Period (hours)	Emission Rate per EST ⁽¹⁾ (g/s)
RC-402-1A, RC-402-2	Regenerative thermal oxidizer handling process exhaust gas associated with brazing line 1 (RC-402-1A) and brazing line 2 (RC-402-2)	Nitrogen oxides	1,24	8.77E-02
		Distillates (petroleum), hydrotreated light	24	4.87E-01
		Soybean oil, methyl esters	24	2.37E-02
		Ethyl cyanoacrylate	24	1.98E-03
		Alcohols C12-13	24	2.34E-02
		Fluorides (as HF)	24 hr, 30-day	9.62E-04
		Particulate Matter	24	2.13E-03

Notes:

(1) Emission rate was provided in EST as a "Total Facility Emission Rate". It was assumed that the emission rate is split equally between RC-402-1A and RC-402-2.

5.3.1.5 Dispersion Model Results

The maximum predicted results from Dillon's dispersion modelling assessment of the Denso facility are presented in **Table 5**.

Table 5: Emission Summary for Assessed Contaminants – Denso (modelled by Dillon)

Contaminant	CAS No.	Averaging Period (hr)	Maximum POI Value (µg/m³) ⁽¹⁾	Maximum POI Value at the Proposed Development (µg/m³)	MECP Criteria (µg/m³) ⁽²⁾	Percentage of MECP Criteria for Maximum POI	Percentage of MECP Criteria at Proposed Development
Nitrogen Oxides	10102-44-0	24	9.25E+00	3.64E+00	200	5%	2%
		1	4.97E+01	1.50E+01	400	12%	4%
Distillates (petroleum), hydrotreated light	64742-47-8	24	5.13E+01	2.02E+01	375	14%	5%
Soybean oil, methyl esters	67784-80-9	24	2.50E+00	9.84E-01	80	3%	1%
Ethyl cyanoacrylate	7085-85-0	24	2.09E-01	8.22E-02	5	4%	2%
Alcohols C12-13	75782-86-4	24	2.47E+00	9.72E-01	155	2%	1%
Fluorides (as HF) - Total Growing Season	7664-39-3	24	1.01E-01	3.99E-02	1.72	6%	2%
		30-day	0.00E+00	8.64E-03	0.69	0%	1%
24		1.01E-01	3.99E-02	3.44	3%	1%	
30-day		2.28E-02	8.64E-03	1.38	2%	1%	
24		1.01E-01	3.99E-02	0.86	12%	5%	
30-day		2.28E-02	8.64E-03	0.34	7%	3%	
Particulate Matter	N/A	24	2.25E-01	8.84E-02	120	0%	0%

Notes:

- (2) Meteorological anomalies have been removed when determining the maximum POI for contaminants with 1-hour and 24-hour averaging periods, in accordance with the MECP's Air Dispersion Modelling Guideline (A-11).
- (3) Criteria listed in the MECP Air Contaminants Benchmarks (ACB) List: Standards, Guidelines, and Screening Levels for Assessing POI Concentrations of Air Contaminants, Version 3.0, dated April 2023.

The results indicate that the maximum POI concentrations at the Proposed Development are below the maximum POI concentrations at the MECP approved grid of receptors.

The predicted maximum POIs and POI concentrations at the Proposed Development were compared to the applicable MECP criteria. All concentrations are predicted to be below the applicable MECP criteria. Therefore, it can be concluded that the Proposed Development is not limiting Denso's ability to operate in compliance with the conditions of their ECA.

5.3.1.6 Nuisance Contaminant Assessment

Fugitive Dust Impacts

Based on site visit observations and a review of aerial imagery, no significant sources of fugitive dust emissions (e.g., roadways and storage piles) were identified at the Denso facility. Per the Operation and Maintenance requirements of Denso's ECA, the facility is required to implement operating procedures and maintenance programs to minimize all fugitive emissions. Based on this requirement, and the absence of significant fugitive dust sources observed at the facility by Dillon, it is expected that Denso is compatible with the Proposed Development from a fugitive dust perspective.

Odour Impacts

Based on the Emission Summary Table, odour-based contaminants are not assessed in Denso's ESDM Report. No odours were detected during either site visit when standing in proximity to and downwind from Denso. Per the Operation and Maintenance requirements of the facility's ECA, Denso is required to implement operating procedures and maintenance programs to prevent and/or minimize odorous emissions. Schedule C of the ECA describes the thermal oxidizers as "radiator degreaser stacks", indicating that potential odours from degreasing operations would be reduced by the thermal oxidizers. The primary North American Industry Classification System (NAICS) Code that was identified for the industry is 326193 – *Motor vehicle plastic parts manufacturing*. With respect to the MECP's EASR Publication under O. Reg. 1/17, this class of industry is listed as an industry with the potential for odorous activities. Per O. Reg. 1/17, a Best Management Practices Plan (BMPP) for odour would be required if the distance between the facility's closest point of discharge of odour and the property line of the closest point of reception is less than 500 m. The locations of potential odour sources at Denso are unknown however there are existing sensitive uses (single detached dwellings) located northeast of Denso that may be within 500 m of Denso's odour sources. Should Denso be currently operating under a BMPP for odour, it is expected that best practices currently implemented at the facility would also reduce impacts and the likelihood for complaints at the Proposed Development. If Denso is not currently operating under a BMPP for odour, and there are odour emission sources located within 500 m of the Proposed Development, further assessment would be required to assess compatibility.

5.3.2 The TDL Group Corp.

The TDL Group Corp. (TDL) operates a refrigerated food warehousing and storage facility at 950 Southgate Road. The green space portion of TDL's property is adjacent to the southern property boundary of the Proposed Development. Per the MECP's online database for Environmental Permissions, TDL operates under Environmental Compliance Approval (ECA) Number 1704-8W3HRC, dated July 26, 2012, which is provided in **Appendix C**. The ECA approves operation of the following processes:

- One 1,750 kW diesel generator used for peak shaving; and
- One 900 kW diesel generator used for peak shaving.

With respect to the MECP Guideline D-6 industrial categorization criteria in **Table 1**, TDL appears to allow for a medium level of production, however it does not have outdoor storage and is a self-contained plant which stores a packaged product. Dust and/or odour emissions appear to be infrequent and not intense, and no significant sources of fugitive dust emissions have been identified. Considering these characteristics, the facility is considered as a Class I industry from an air quality perspective per the D-6 Guidelines. As the Proposed Development is within the recommended minimum separation distance of TDL, a technical assessment of regulated contaminants and nuisance impacts is required.

An ESDM Report was provided to Dillon by TDL and it is Dillon's understanding that this is the most recent ESDM Report. Air dispersion modelling was completed based on the information provided in the ESDM Report (see **Appendix E**).

5.3.2.1 Assessment Criteria

Similar to the assessment completed for Denso, TDL facility emissions were modelled and compared against contaminant-specific guidelines and standards published by the MECP. Dillon used emissions information from the ESDM Report provided and performed the following assessments:

1. An assessment of significant contaminant emissions to determine if the introduction of the Proposed Development would impact TDL's ability to comply with their ECA; and
2. A review of potential nuisance impacts to determine if the Proposed Development would be expected to experience nuisance impacts related to dust and odour emissions from TDL.

5.3.2.2 Assessment of Significant Contaminant Emissions

Similar to Denso, the introduction of the 3-storey multiplexes and 16- and 14-storey residential towers at the Proposed Development (i.e., operable windows and balconies) where residents may be present represent new receptor locations to the study area where TDL would be required to meet air quality criteria.

Dillon reviewed the emission rate estimates and source parameters in TDL's ESDM Report and performed air dispersion modelling to evaluate compatibility, with respect to significant contaminants,

between TDL's operations and the Proposed Development. Extracted information from the ESDM Report is provided in **Appendix E**.

To evaluate the potential for the Proposed Development to impact TDL's ability to operate in compliance with the conditions of their ECA, the facility was modelled using the MECP's approved receptor grid as well as receptors representing elevated receptors along the facades of the Proposed Development's residential buildings.

5.3.2.3 Source Summary

A summary of the sources of significant contaminant emissions obtained from the ESDM Report and included in the assessment for the existing scenario is provided in **Table 6**. Note that while considered as "not significant" in the ESDM Report, HVAC rooftop equipment and heaters listed in TDL's Source and Contaminant Identification Table (Table 1 of the TDL ESDM Report – see **Appendix E**) was conservatively included in Dillon's assessment. Locations of the HVAC rooftop equipment and heaters were not illustrated in TDL's ESDM Report therefore Dillon has assumed locations of this equipment.

Table 6: TDL Source and Contaminant Summary Table

Source	Source Description per ECA	Assessed Contaminants per EST	Averaging Period ⁽¹⁾ (hours)	Emission Rate per EST (g/s)
HV1	Rooftop HVAC Unit S Maintenance	Nitrogen Oxides	1, 24	0.001
HV2	Rooftop HVAC Unit Main Office	Nitrogen Oxides	1, 24	0.003
HV3	Rooftop HVAC Unit Main Office	Nitrogen Oxides	1, 24	0.003
HV4	Rooftop HVAC Unit Warehouse	Nitrogen Oxides	1, 24	0.003
HV5	Rooftop HVAC Unit Warehouse	Nitrogen Oxides	1, 24	0.006
HV6	Rooftop HVAC Unit Main Office	Nitrogen Oxides	1, 24	0.006
HV7	Rooftop HVAC Unit Main Office	Nitrogen Oxides	1, 24	0.006
HV8	Rooftop HVAC Unit Main Office	Nitrogen Oxides	1, 24	0.006
HV9	Rooftop HVAC Unit Main Office	Nitrogen Oxides	1, 24	0.006
UV1	Unit Heater Pump Room	Nitrogen Oxides	1, 24	0.001
UV2	Unit Heater North Corridor	Nitrogen Oxides	1, 24	0.001

UV3	Unit Heater Rooms 140, 142, 125	Nitrogen Oxides	1, 24	0.001
UV4	Unit Heater Electrical Room	Nitrogen Oxides	1, 24	0.001
UV5	Unit Heater Trash Room	Nitrogen Oxides	1, 24	0.002
IR1	Infrared Heater Shipping Receiving	Nitrogen Oxides	1, 24	0.002
IR2	Infrared Heater Shipping Receiving	Nitrogen Oxides	1, 24	0.002
HWH1	Domestic Water Heater	Nitrogen Oxides	1, 24	0.003
HWH2	Domestic Water Heater	Nitrogen Oxides	1, 24	0.003
HWH3	Domestic Water Heater	Nitrogen Oxides	1, 24	0.003
G1750	1750DQKB Cummins Generator	Nitrogen Oxides	1, 24	0.194
G900	900DFHC Cummins Generator	Nitrogen Oxides	1, 24	0.100

Notes:

- (1) Averaging period of 30 minutes was modelled in TDL ESDM Report, which would have been in accordance with MECP requirements at the time. Dillon performed modelling based on 1-hour and 24-hour averaging periods in accordance with updated MECP requirements (Schedule 3 standards).

5.3.2.4 Dispersion Model Results

The maximum predicted results from Dillon's dispersion modelling assessment of the TDL facility are presented in **Table 7**.

Table 7: Emission Summary for Assessed Contaminants – TDL (modelled by Dillon)

Contaminant	CAS No.	Averaging Period (hr)	Maximum POI Value ($\mu\text{g}/\text{m}^3$) ⁽¹⁾	Maximum POI Value at the Proposed Development ($\mu\text{g}/\text{m}^3$)	MECP Criteria ($\mu\text{g}/\text{m}^3$) ⁽²⁾	Percentage of MECP Criteria for Maximum POI	Percentage of MECP Criteria at Proposed Development
Nitrogen Oxides	10102-44-0	24	2.65E+01	1.06E+01	200	12%	6%
		1	7.89E+01	3.46E+01	400	19%	9%

Notes:

- (1) Meteorological anomalies have been removed when determining the maximum POI, in accordance with the MECP's Air Dispersion Modelling Guideline (A-11).
- (2) Criteria listed in the MECP Air Contaminants Benchmarks (ACB) List: Standards, Guidelines, and Screening Levels for Assessing POI Concentrations of Air Contaminants, Version 3.0, dated April 2023.

The results indicate that the maximum POI concentrations at the Proposed Development are below the maximum POI concentrations at the MECP approved grid of receptors.

The predicted maximum POI concentrations and POI concentrations at the Proposed Development were compared to the applicable MECP criteria. All concentrations are predicted to be below the applicable MECP criteria. Therefore, it can be concluded that the Proposed Development is not limiting TDL's ability to operate in compliance with the conditions of their ECA.

5.3.2.5 Nuisance Contaminant Assessment

Fugitive Dust Impacts

Based on site visit observations and a review of aerial imagery, no significant sources of fugitive dust emissions (e.g., roadways and storage piles) were identified at the TDL facility. Sources of fugitive dust emissions are also not included in TDL's ESDM Report. Based on the absence of significant fugitive dust sources observed at the facility by Dillon as well as in the ESDM Report, it is expected that TDL is compatible with the Proposed Development from a fugitive dust perspective.

Odour Impacts

Per the ESDM Report, the TDL facility's NAICS code is identified as *493120 – Refrigerated warehousing and storage*. With respect to the MECP's EASR Publication under O. Reg. 1/17, this class of industry is not listed as an industry with odorous activities and expected operations are not consistent with the EASR Publication's listed odorous processes. Additionally, in accordance with the Operation and Maintenance requirements of the facility's ECA, TDL is required to implement appropriate measures to minimize odorous emissions from all potential sources. Therefore, it is expected that TDL is compatible with the Proposed Development from an odour emissions perspective.

5.3.3 Organic Meadow Limited Partnership

Organic Meadow Limited Partnership (Organic Meadow) operates a dairy product manufacturing facility at 362 Laird Road, approximately 200 m northwest of the Proposed Development. Based on signage observed during the February 13, 2024 site visit, Organic Meadow may be expanding their operations to the property west of the facility (386 Laird Road) however this has not been confirmed by Organic Meadow personnel. No Environmental Permissions have been identified for Organic Meadow.

With respect to the MECP Guideline D-6 industrial categorization criteria in **Table 1**, Organic Meadow appears to allow for a medium level of production, has outdoor storage tanks, and no significant sources of fugitive dust emissions. Based on site visit operations, dust and/or odour emissions appear to be infrequent and not intense. Considering these characteristics, the facility is considered as a Class II industry per the D-6 Guidelines. As the Proposed Development is within the potential area of influence of Organic Meadow, further assessment of regulated contaminants and nuisance impacts is required.

5.3.3.1

Assessment Criteria

No Environmental Permissions have been identified for Organic Meadow therefore Dillon performed the following comparative assessments:

1. An assessment of significant contaminant emissions to determine if the introduction of the Proposed Development would impact Organic Meadow's ability to comply with MECP requirements (if applicable); and
2. A review of potential nuisance impacts to determine if the Proposed Development would be expected to experience nuisance impacts related to dust and odour emissions from Organic Meadow.

5.3.3.2

Assessment of Significant Contaminant Emissions

Similar to Denso and TDL, the introduction of the 3-storey multiplexes and 16- and 14-storey residential towers at the Proposed Development (i.e., operable windows and balconies) where residents may be present represent new receptor locations to the study area where Organic Meadow would be required to meet air quality criteria.

As detailed emission source information was not available. Dillon included the following sources in the dispersion model to represent the Organic Meadow facility:

- One volume source intended to represent the low-level exhaust stacks on the front, shorter part of the building;
- One volume source intended to represent the low-level exhaust stacks on the back, taller part of the building as well as the storage tanks located on the west side of the building; and
- One volume source intended to represent potential exhaust stacks and/or storage tanks associated with a facility expansion on the currently vacant lot at 386 Laird Road.

To evaluate the potential for the Proposed Development to impact Organic Meadow's ability to operate in compliance, if applicable, the facility was modelled using the MECP's approved receptor grid as well as receptors representing elevated receptors along the facades of the Proposed Development's residential buildings. Scaled results of the assessment are shown in **Table 8**.

Table 8: Scaled Dispersion Modelling Results – Organic Meadow (modelled by Dillon)

Source	Results at MECP Receptors	Results at Proposed Development	Proposed Development Limiting?
Volume 1 – Exhaust stacks on front of building Volume 2 – Exhaust stacks on back of building and storage tanks on west side Volume 3 – Exhaust stacks and/or tanks for future expansion at 386 Laird Rd	1	0.12	No

Table 8 shows that the predicted results for the assumed existing and expansion sources are higher at the MECP receptor grid than at the Proposed Development. Therefore, based on the comparative assessment completed, it can be concluded that the Proposed Development is not limiting on Organic Meadow's ability to operate in compliance with any applicable Environmental Permissions.

5.3.3.3

Nuisance Contaminant Assessment**Fugitive Dust Impacts**

Based on site visit observations and a review of aerial imagery, no significant sources of fugitive dust emissions (e.g., roadways and storage piles) were identified at the Organic Meadow facility. Based on the absence of significant fugitive dust sources observed at the facility by Dillon, it is expected that Organic Meadow is compatible with the Proposed Development from a fugitive dust perspective.

Odour Impacts

The primary NAICS code that was identified for the industry based on consultation with Organic Meadow personnel is 311511 – *Fluid milk manufacturing*. Organic Meadow personnel were not aware of any complaints from the surrounding area as a result of their operations. With respect to the MECP's EASR Publication under O. Reg. 1/17, this class of industry is listed as an industry with the potential for odorous activities. Per O. Reg. 1/17, a Best Management Practices Plan (BMPP) for odour would be required if the distance between the facility and a sensitive use is less than 100 m. Per the Site Plan provided in **Appendix A**, there is a natural corridor along the western portion of the Proposed Development site that buffers the sensitive uses from industries located to the west and northwest. Given that the sensitive uses of the Proposed Development are approximately 250 m from Organic Meadow's eastern property line, which is greater than the setback distance of 100 m in the EASR Publication, it is expected that Organic Meadow is compatible with the Proposed Development from an odour perspective.

5.3.4 Oskam Welding & Machine Ltd.

Oskam Welding & Machine Ltd. (Oskam) operates a custom metal fabrication and millwrighting facility at 40 Rutherford Court, approximately 270 m west of the Proposed Development. Oskam currently operates under the Certificate of Approval - Air (CofA) (now called an ECA) # 4520-7MZU7N (see **Appendix C**) dated January 28, 2009. The ECA approves operation of the following equipment:

- Eighteen portable welders;
- One plasma cutter and portable torch cutters;
- Four roof mounted exhaust fans serving the welding area;
- One paint spray booth;
- Two natural gas fired heaters with total heat input of 101,300 kilojoules per hour (kJ/h); and
- One natural gas fired HVAC unit and thirteen natural gas fired infrared heaters, having a total heat input of 1,427,000 kJ/hr.

With respect to the MECP Guideline D-6 industrial categorization criteria in **Table 1**, Oskam appears to be a small-scale plant, with outside storage permitted. Dust and/or odour emissions were not observed during the site visit however based on the activities described in the CofA, dust and/or odour emissions may be frequent and occasionally intense. Considering these characteristics, the facility is considered as a Class II industry per the D-6 Guidelines. The western property line of the Proposed Development is within the potential area of influence of Oskam, however per the Site Plan provided in **Appendix A**, there is a natural corridor along the western portion of the Proposed Development site that buffers the sensitive uses from industries located to the west and northwest. As the distance between the sensitive uses of the Proposed Development and Oskam is greater than 300 m, further assessment of compatibility is not required.

5.3.5 Sleeman Breweries Ltd.

Sleeman Breweries Ltd. (Sleeman) processes and bottles beer at the facility located at 551 Clair Road West, approximately 700 m west of the Proposed Development. Per the MECP's online database for Environmental Permissions, Sleeman operates under Environmental Activity and Sector Registry (EASR) Registration Number R-010-9112817681, dated January 7, 2021 (see **Appendix C**).

With respect to the MECP Guideline D-6 industrial categorization criteria in **Table 1**, Sleeman appears to allow for large production levels, has outdoor storage tanks, and no significant sources of fugitive dust emissions. No odours were detected in proximity to the facility during the site visits however based on the nature of operations, odour emissions may be persistent or intense. Considering these characteristics, the facility is considered as a Class III industry per the D-6 Guidelines. As the Proposed Development is within the potential AOI of Sleeman (1000m), further assessment of regulated contaminants and nuisance impacts is required.

5.3.5.1

Information Requests

Dillon personnel reached out to Sleeman via phone call and e-mail to request information regarding their operations as they related to land use compatibility, communicating the purpose of Dillon's assessment in promoting compatibility with the proposed sensitive uses, as well as protect the existing industries in the area. The information requested included details which are typically summarized in a facility's ESDM report as outlined in the facility's EASR. No response has been provided by Sleeman at this time. Dillon also submitted a Freedom of Information (FOI) request to the MECP to request copies of Sleeman's ESDM Report and any records of nuisance complaints. Dillon received a response from the MECP which indicated there were no active records available within the 2014-2024 timeframe that was specified. A copy of the MECP FOI correspondence is provided in **Appendix F**. As the facility is registered to the EASR, a copy of their Emission Summary Table is available through the MECP online database. The facility's Emission Summary Table is provided in **Appendix F**.

5.3.5.2

Assessment Criteria

As detailed emissions information was not available, Dillon performed the following comparative assessments:

1. An assessment of significant contaminant emissions to determine if the introduction of the Proposed Development would impact Sleeman's ability to comply with their EASR; and
2. A review of potential nuisance impacts to determine if the Proposed Development would be expected to experience nuisance impacts related to dust and odour emissions from Sleeman.

5.3.5.3

Assessment of Significant Contaminant Emissions

The introduction of the 3-storey multiplexes and 16- and 14-storey residential towers at the Proposed Development (i.e., operable windows and balconies) where residents may be present represent new receptor locations to the study area where Sleeman would be required to meet air quality criteria.

Dillon reviewed the total emission rates provided in Sleeman's Emission Summary Table and the sources described in Sleeman's Confirmation of EASR Registration (see **Appendix C**) and performed air dispersion modelling to evaluate compatibility, with respect to significant contaminants, between Sleeman's operations and the Proposed Development.

As detailed emission source information was not available. Dillon included the following sources in the dispersion model to represent the Sleeman facility:

- One volume source intended to represent the exhaust stacks on the main building, with an average release height of 1 m above the rooftop;
- One volume source intended to represent the storage tanks located on the southern portion of the main building, with an average release height of 10 m above the rooftop; and
- One volume source intended to represent the storage tanks located adjacent to the building located east of the main building, with an average release height of 8 m above the rooftop.

To evaluate the potential for the Proposed Development to impact Sleeman's ability to operate in compliance, the facility was modelled using the MECP's approved receptor grid as well as receptors representing elevated receptors along the facades of the Proposed Development's residential buildings. Scaled results of the assessment are shown in **Table 9**.

Table 9: Scaled Dispersion Modelling Results – Sleeman (modelled by Dillon)

Source	Results at MECP Receptors	Results at Proposed Development	Proposed Development Limiting?
Volume 1 – Exhaust stacks on main building Volume 2 – Storage tanks on south portion of main building Volume 3 – Storage tanks adjacent to smaller building	1	0.05	No

Table 9 shows that the predicted results for the assumed existing and expansion sources are higher at the MECP receptor grid than at the Proposed Development. Therefore, based on the comparative assessment completed, it can be concluded that the Proposed Development is not limiting on Sleeman's ability to operate in compliance with their EASR.

5.3.5.4

Nuisance Contaminant Assessment

Fugitive Dust Impacts

Based on site visit observations and a review of aerial imagery, no significant sources of fugitive dust emissions (e.g., roadways and storage piles) were identified at the Sleeman facility. It is also indicated in Sleeman's Confirmation of EASR Registration that the ESDM Report did not identify a source of fugitive dust. Based on the absence of significant fugitive dust sources observed at the facility by Dillon as well as in the ESDM Report, it is expected that Sleeman is compatible with the Proposed Development from a fugitive dust perspective.

Odour Impacts

Per Sleeman's Emission Summary Table, the facility emits the following odorous compounds:

- Mercaptans; and
- Ethanol (CAS No. 64-17-5).

The Emission Summary Table indicates that Mercaptans and Ethanol concentrations are predicted to be well below the MECP's limits (1% and 3%, respectively). It is unknown whether the presented concentrations are based on the MECP ground-level receptor grid or at existing sensitive receptors.

Sleeman's EASR registration confirms that a Best Management Practice Plan (BMPP) for odour is required for the facility to manage nuisance impacts of odour resulting from facility processes. There are existing sensitive uses in proximity to Sleeman, including a five-storey hotel at 11 Corporate Court, approximately 260 m north of Sleeman and what appears to be a residence at 88 Crawley Rd, located 330 m south of Sleeman. While the Proposed Development is located in a different wind direction than the identified existing sensitive uses, the sensitive uses of the Proposed Development are located more than 500 m further away (approximately 840 m from the Sleeman buildings). It is expected that best practices implemented at the Sleeman facility to manage odour impacts at the existing sensitive receptors would also reduce impacts and the likelihood for complaints at the Proposed Development. Furthermore, given that the predicted maximum concentrations presented in the Emission Summary Table for odorous compounds are 3% or less than the applicable MECP limits, it is expected that impacts at the Proposed Development, including elevated receptors, would also be less than the MECP limits, considering the 840 m separation distance. Based on the above, it is expected that the Proposed Development is compatible with Sleeman from an odour perspective.

6.0

Future Industrial Uses

The lands surrounding the Proposed Development were reviewed to identify vacant lands that have permitted industrial land uses. The following vacant lands were identified in proximity to the Proposed Development:

320 Clair Road West

The vacant lands at 320 Clair Road West are adjacent to the northwestern property boundary of the Proposed Development and are zoned as Industrial (B) per the City of Guelph's Zoning Bylaw (2023)-20790. It is Dillon's understanding that the lands were severed from the 900 Southgate Drive (Denso) property. No development applications for this property have been identified at this time.

For the purposes of this assessment, it's been assumed that the future use of the lands will be characteristic of a Class I industry which may include uses such as:

- Warehousing and distribution; and/or
- Enclosed light industrial uses such as assembly and packaging.

Per **Table 2**, the potential Area of Influence and Recommended Minimum Separation Distance of a Class I industry is 70 m and 20 m, respectively. Given that there is a greater than 70 m separation distance (buffer) between the sensitive uses of the Proposed Development and the 320 Clair Road West property line, air contaminant, odour, and dust impacts from future Class I industrial land uses on the Proposed Development are not expected. Should the vacant lands be used for a Class II or Class III industry, further assessment would be required.

426 Clair Road West

The vacant lands at 426 Clair Road West are located approximately 530 m west of the Proposed Development. Based on information obtained online, an industrial logistics facility is expected to be constructed, which may include cold storage. With respect to the MECP Guideline D-6 industrial categorization criteria in **Table 1**, this type of facility would be considered a Class II industry. Given that the Proposed Development is located greater than the potential Area of Influence of a Class II industry (300 m), air contaminant, odour, and dust impacts from future Class II industrial land uses on the Proposed Development are not expected.

7.0

Conclusions

Dillon Consulting Limited was retained by Home Opportunities to complete an Air Quality Impact Study for a proposed residential development located at 280 Clair Road West in Guelph, Ontario. This assessment has been completed in support of the Official Plan Amendment Zoning By-law Amendment application for the Proposed Development.

The scope of this study is to assess the air quality impacts, including regulated air contaminants, odour and dust, from surrounding land uses on the Proposed Development.

Based on the completed assessment, for all of the surrounding industries, the Proposed Development is not expected to impact each industry's ability to obtain or maintain Environmental Permissions. Furthermore, dust and/or odour impacts from the industries on the Proposed Development are not expected. As the assessment is based on assumptions with respect to emissions from Denso Manufacturing, Organic Meadow, and Sleeman Breweries, the assessment should be updated if the applicable information is provided.

8.0

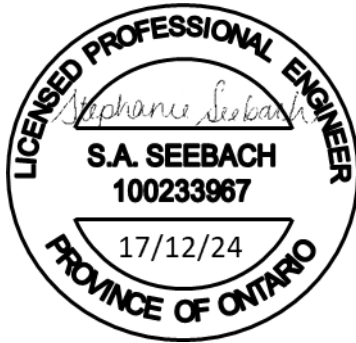
Closure

This Air Quality Impact Study was prepared by Dillon for the sole benefit of Home Opportunities. The material in the report reflects Dillon's judgement in light of the information available to Dillon at the time of this report preparation. Any use which a third party makes of this report, or any reliance on or decisions made based on it, are the responsibilities of such third parties. Dillon accepts no responsibility for damages, if any, suffered by any third party as a result of decisions made or actions based on this report.

We trust that the report is to your satisfaction. Please do not hesitate to contact the undersigned if you have any further questions on this report.

Respectfully Submitted:

DILLON CONSULTING LIMITED



Stephanie Seebach, P.Eng
Associate

Dave Diemer, P.Eng.
Partner

Figures



Scale 1:3,000

Figure 1

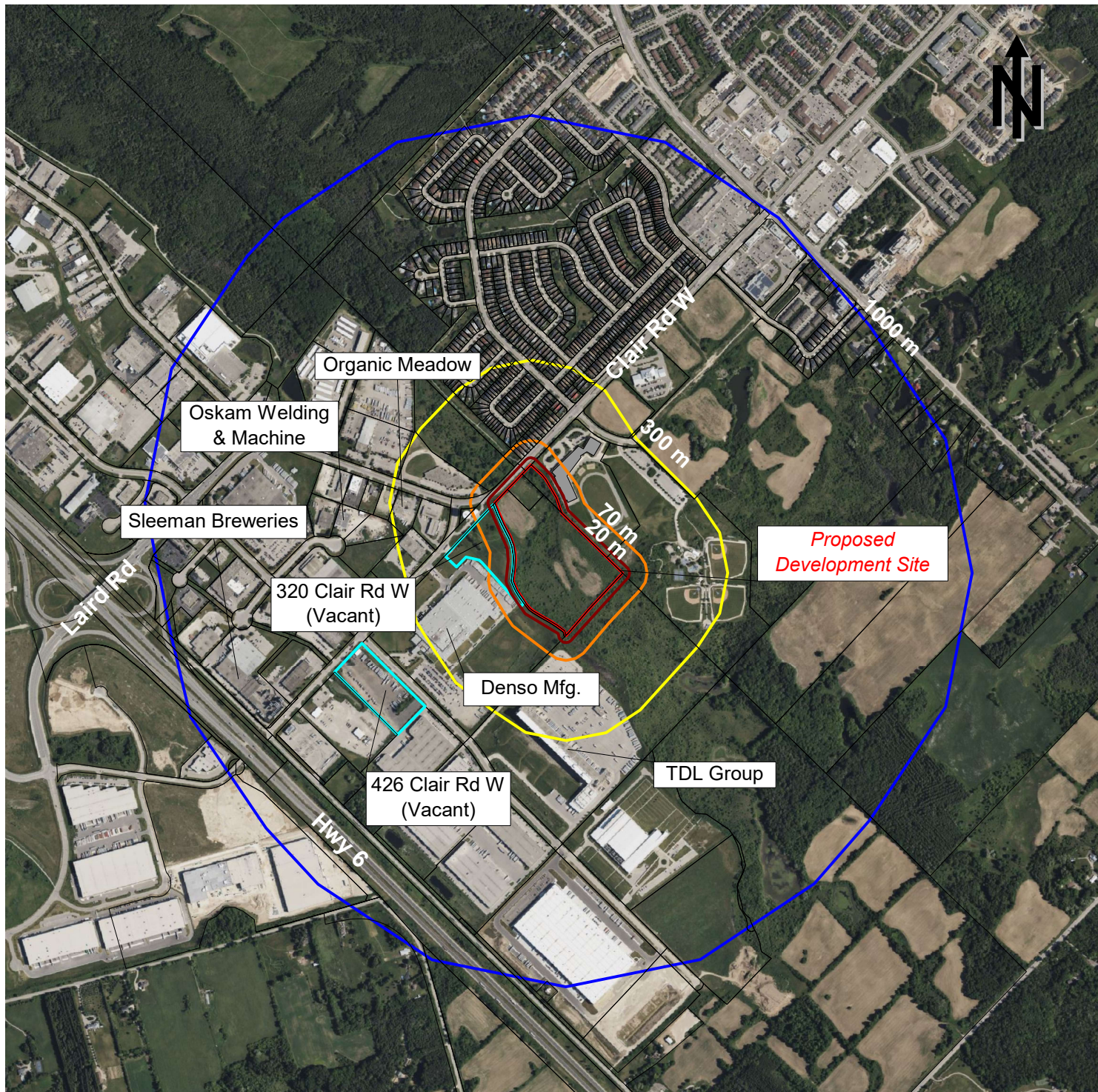
Project # 24-7484

October 2024

Development Site Plan

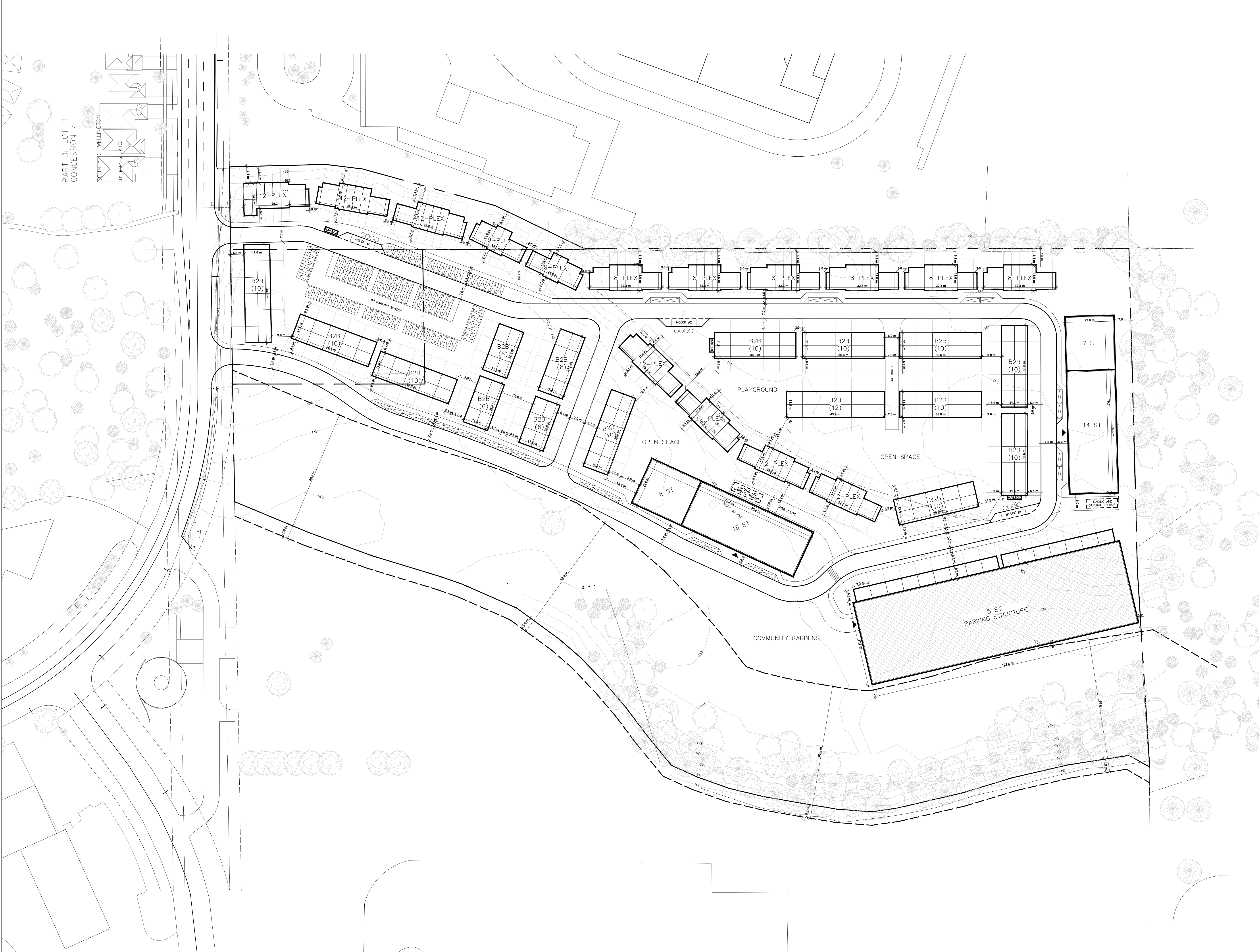
280 Clair Road W, Guelph, Ontario





Appendix A

Development Site Plan



The drawings are the property of Architecture unfolded. The drawing and all associated documents are an instrument of service by the Designer. The drawing and the information contained therein may not be reproduced in whole or in part without prior written permission of the designer.

These Contract Documents are the property of the architect. The architect bears no responsibility for the interpretation of these documents by the Contractor. Upon written application the architect will provide written/graphic clarification or supplementary information regarding the intent of the Contract Documents. The architect will review Shop Drawings submitted by the Contractor for design conformance only.

Drawings are not to be scaled for construction. Contractor to verify all existing conditions and dimensions required to perform the work and report any discrepancies with the Contract Documents to the architect before commencing work.

Positions of exposed or finished mechanical or electrical devices, fittings, and fixtures are indicated on architectural drawings. The locations shown on the architectural drawings given over the Mechanical and Electrical drawings. Those items not clearly located will be located as directed by the architect.

These drawings are not to be used for construction unless noted below as "Issued for Construction"

All work to be carried out in conformance with the Code and bylaws of the authorities having jurisdiction.

The Designer of these plans and specifications gives no warranty or representation to any party about the constructability of the represented by them. At contract or subcontractor must satisfy themselves when bidding and at all times that they can properly construct the work represented by these plans.

notes:

revisions: dd-mm-yy

architectural team :

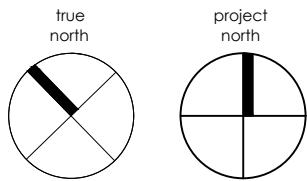
Eduardo Ortiz
Ihab Daakour

spa no. -
project:
280 Clair Rd W, Guelph, ON
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SITE PLAN

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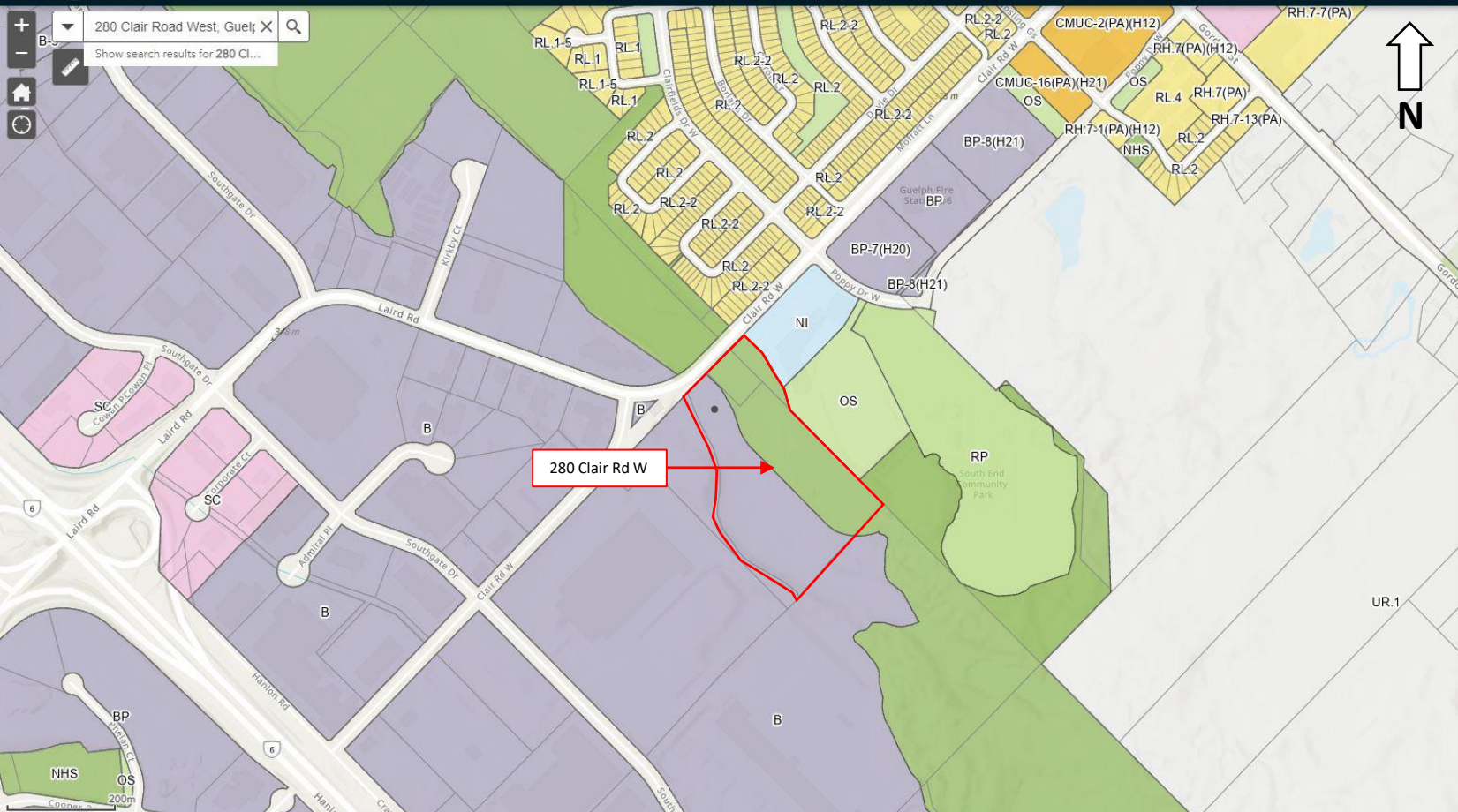
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drawn by:



drawing number:
A100

Appendix B

Zoning Map



Legend

Addresses

Zoning By-law (2023)-20790
Zoning By-law (2023)-20790

- RL
- RM
- RH
- CMUC
- MUC
- NCC
- MOC
- CC
- SC
- D
- B
- BP
- IRP
- MB
- EMU
- NI
- I
- OS
- GC
- US
- NP
- CP
- RP
- NHS
- U
- UR
- MZO-1

Part A: Administration and Interpretation

Establishment of Zones and Uses

2. Establishment of zones and uses

2.1 Zones and zone symbols

This **by-law** establishes the following **zones** and places all lands subject to this **by-law** in one or more of the following **zones**:

Residential zones	
RL.1	Low density residential 1
RL.2	Low density residential 2
RL.3	Low density residential 3
RL.4	Low density residential 4
RM.5	Medium density residential 5
RM.6	Medium density residential 6
RH.7	High density residential 7
Mixed-use zones	
CMUC	Commercial mixed-use centre
MUC	Mixed-use corridor
NCC	Neighbourhood commercial centre
MOC	Mixed office/commercial
Commercial zones	
SC	Service commercial
CC	Convenience commercial
Downtown zones	
D.1	Downtown 1
D.2	Downtown 2
D.3	Downtown 3
D.3a	Downtown 3a
Employment zones	
B	Industrial
BP	Corporate business park
IRP	Institutional/research park
MB	Mixed business
EMU.1	Employment mixed-use 1
EMU.2	Employment mixed-use 2
Institutional zones	

Zone	Classification
NI	Neighbourhood institutional
I.1	Major institutional 1 - General
I.2	Major institutional 2 - University of Guelph
Open space, golf course and park zones	
OS	Open space
GC	Golf course
US	Urban square
NP	Neighbourhood park
CP	Community park
RP	Regional park
Natural heritage system zone	
NHS	Natural heritage system
Major utility zone	
U	Major utility
Urban reserve zones	
UR.1	Urban reserve 1
UR.2	Urban reserve 2

Appendix C

Environmental Permissions



AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 9696-AJFHC2

Issue Date: April 11, 2017

Denso Manufacturing Canada, Inc.
900 Southgate Drive
Guelph, Ontario
N1L 1K1

Site Location: 900 Southgate Drive
Guelph City, County of Wellington
N1L 1K1

You have applied under section 20.2 of Part II.1 of the Environmental Protection Act, R.S.O. 1990, c. E. 19 (Environmental Protection Act) for approval of:

Description Section

A facility manufacturing automotive heat exchangers, including heating, ventilating and air conditioning (HVAC) systems, radiators, and condensers, consisting of the following processes and support units:

- injection molding;
- metal forming;
- parts degreasing;
- powder coating;
- auto and manual flame brazing;
- brazing furnaces;
- welding;
- assembly and component testing;
- one (1) regenerative thermal oxidizer identified as RC-402-1A, equipped with one (1) natural gas fired burner and two (2) thermocouples, a continuous temperature monitoring and recording system, and two (2) process fans, handling 0.83 cubic metre per second of process exhaust gas originating from an afterburner associated with brazing line 1, discharging to the air through a stack having an exit diameter of 0.71 metre, and extending 6.10 metres above the roof and 15.50 metres above grade; and
- one (1) regenerative thermal oxidizer identified as RC-402-2, equipped with one (1) natural gas fired burner and two (2) thermocouples, a continuous temperature monitoring and recording system, and two (2) process fans, handling 1.25 cubic metres per second of process exhaust gas originating from an afterburner associated with brazing line 2, discharging to the air through a stack having an exit diameter of 0.50 metre, and extending 6.10 metres above the roof and 15.50 metres above grade;

including the *Equipment* and any other ancillary and support processes and activities, operating at a *Facility Production Limit* of up to **3 million HVAC units per year, 2.5 million radiators per year and 3.5 million condensers per year** discharging to the air as described in the *Original ESDM Report*.

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

1. "ACB list" means the document entitled "Air Contaminants Benchmarks (ACB) List: Standards, guidelines and screening levels for assessing point of impingement concentrations of air contaminants", as amended from time to time and published by the *Ministry* and available on a Government website;
2. "Acceptable Point of Impingement Concentration" means a concentration accepted by the *Ministry* as not likely to cause an adverse effect for a *Compound of Concern* that,
 - a. is not identified in the *ACB list*, or
 - b. is identified in the *ACB list* as belonging to the category "Benchmark 2" and has a concentration at a *Point of Impingement* that exceeds the concentration set out for the contaminant in that document.

With respect to the *Original ESDM Report*, the *Acceptable Point of Impingement Concentration* for a *Compound of Concern* mentioned above is the concentration set out in the *Original ESDM Report*;

3. "Acoustic Assessment Report" means the report, prepared in accordance with *Publication NPC-233* and Appendix A of the *Basic Comprehensive User Guide*, by Spencer Bannon / E.K. Gillin & Associates and dated June 2, 2016 submitted in support of the application, that documents all sources of noise emissions and *Noise Control Measures* present at the *Facility*, as updated in accordance with Condition 6 of this *Approval*;
4. "Acoustic Assessment Summary Table" means a table prepared in accordance with the *Basic Comprehensive User Guide* summarising the results of the *Acoustic Assessment Report*, as updated in accordance with Condition 6 of this *Approval*;
5. "Approval" means this entire Environmental Compliance Approval and any *Schedules* to it;
6. "Basic Comprehensive User Guide" means the *Ministry* document titled "Basic Comprehensive Certificates of Approval (Air) User Guide" dated March 2011, as amended;
7. "Company" means **Denso Manufacturing Canada Inc.** that is responsible for the construction or operation of the *Facility* and includes any successors and assigns in accordance with section 19 of the *EPA*;
8. "Compound of Concern" means a contaminant described in paragraph 4 subsection 26 (1) of *O. Reg. 419/05*, namely, a contaminant that is discharged from the *Facility* in an amount that is not negligible;
9. "Description Section" means the section on page one of this *Approval* describing the *Company's* operations and the *Equipment* located at the *Facility* and specifying the *Facility Production Limit* for the *Facility*;
10. "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*;
11. "District Manager" means the District Manager of the appropriate local district office of the *Ministry*, where the *Facility* is geographically located;
12. "Emission Summary Table" means a table described in paragraph 14 of subsection 26 (1) of *O. Reg. 419/05*;
13. "Environmental Assessment Act" means the Environmental Assessment Act, R.S.O. 1990, c.E.18, as amended;
14. "EPA" means the Environmental Protection Act, R.S.O. 1990, c.E.19, as amended;
15. "Equipment" means equipment or processes described in the *ESDM Report*, this *Approval* and in the *Schedules* referred to herein and any other equipment or processes;
16. "Equipment with Specific Operational Limits" means the regenerative thermal oxidizers and any *Equipment* related to the thermal oxidation of waste or waste derived fuels, fume incinerators or

any other *Equipment* that is specifically referenced in any published *Ministry* document that outlines specific operational guidance that must be considered by the *Director* in issuing an *Approval*;

17. "*ESDM Report*" means the most current Emission Summary and Dispersion Modelling Report that describes the *Facility*. The *ESDM Report* is based on the *Original ESDM Report* and is updated after the issuance of this *Approval* in accordance with section 26 of *O. Reg. 419/05* and the *Procedure Document*;
18. "*Facility*" means the entire operation located on the property where the *Equipment* is located;
19. "*Facility Production Limit*" means the production limit placed by the *Director* on the main product(s) or raw materials used by the *Facility*;
20. "*Log*" means a document that contains a record of each change that is required to be made to the *ESDM Report* and *Acoustic Assessment Report*, including the date on which the change occurred. For example, a record would have to be made of a more accurate emission rate for a source of contaminant, more accurate meteorological data, a more accurate value of a parameter that is related to a source of contaminant, a change to a *Point of Impingement* and all changes to information associated with a *Modification* to the *Facility* that satisfies Condition 2;
21. "*Manager*" means the *Manager*, Technology Standards Section, Standards Development Branch, who has been appointed under Section 5 of the Act for the purposes of Section 11(1)2 of *O. Reg. 419*, or any other person who represents and carries out the duties of the *Manager*, Technology Standards Section, Standards Development Branch, as those duties relate to the conditions of this *Approval*.
22. "*Minister*" means the Minister of the Environment and Climate Change or such other member of the Executive Council as may be assigned the administration of the *EPA* under the Executive Council Act;
23. "*Ministry*" means the ministry of the *Minister*;
24. "*Modification*" means any construction, alteration, extension or replacement of any plant, structure, equipment, apparatus, mechanism or thing, or alteration of a process or rate of production at the *Facility* that may discharge or alter the rate or manner of discharge of a *Compound of Concern* to the air or discharge or alter noise or vibration emissions from the *Facility*;
25. "*Noise Control Measures*" means measures to reduce the noise emissions from the *Facility* and/or *Equipment* including, but not limited to, silencers, acoustic louvres, enclosures, absorptive treatment, plenums and barriers;
26. "*O. Reg. 419/05*" means Ontario Regulation 419/05, Air Pollution – Local Air Quality, as amended;
27. "*Organic Matter*" means organic matter having carbon content expressed as equivalent methane;
28. "*Original ESDM Report*" means the Emission Summary and Dispersion Modelling Report which was prepared in accordance with section 26 of *O. Reg. 419/05* and the *Procedure Document* by Spencer Bannon / E.K. Gillin & Associates and dated December 2016 submitted in support of the application, and includes any changes to the report made up to the date of issuance of this *Approval*;
29. "*Point of Impingement*" has the same meaning as in section 2 of *O. Reg. 419/05*;
30. "*Point of Reception*" means Point of Reception as defined by *Publication NPC-300*, as applicable;
31. "*Pre-Test Plan*" means a plan for the *Source Testing* including the information required in Section 5 of the *Source Testing Code*.
32. "*Procedure Document*" means *Ministry* guidance document titled "Procedure for Preparing an

- Emission Summary and Dispersion Modelling Report" dated February 2017, as amended;
33. "*Processes with Significant Environmental Aspects*" means the *Equipment* which, during regular operation, would discharge one or more contaminants into the air in an amount which is not considered as negligible in accordance with section 26 (1) 4 of O. Reg. 419/05 and the *Procedure Document*;
34. "*Publication NPC-207*" means the *Ministry* draft technical publication "Impulse Vibration in Residential Buildings", November 1983, supplementing the Model Municipal Noise Control By-Law, Final Report, published by the *Ministry*, August 1978, as amended;
35. "*Publication NPC-233*" means the *Ministry* Publication NPC-233, "Information to be Submitted for Approval of Stationary Sources of Sound", October, 1995, as amended;
36. "*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;
37. "*Schedules*" means the following schedules attached to this *Approval* and forming part of this *Approval* namely:
- Schedule A - Supporting Documentation
 - Schedule B - Continuous Temperature Monitor
 - Schedule C - *Source Testing* Requirement
38. "*Source Testing*" means sampling and testing to measure emissions resulting from operating the *Targeted Sources* under conditions which yield the worst case emissions within the approved operating range of the *Targeted Sources*, which satisfies paragraph 1 of subsection 11(1) of O. Reg. 419/05.
39. "*Source Testing Code*" means the Ontario Source Testing Code, dated June 2010, prepared by the Ministry, as amended.
40. "*Targeted Sources*" means the sources listed in Schedule C.
41. "*Test Contaminants*" means alcohol ethoxylate, hydrotreated distillate and methyl ester.
42. "*Toxicologist*" means a qualified professional currently active in the field of risk assessment and toxicology that has a combination of formal university education, training and experience necessary to assess contaminants; and
43. "*Written Summary Form*" means the electronic questionnaire form, available on the *Ministry* website, and supporting documentation, that documents the activities undertaken at the *Facility* in the previous calendar year.

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

TERMS AND CONDITIONS

1. GENERAL

- I. Except as otherwise provided by this *Approval*, the *Facility* shall be designed, developed, built, operated and maintained in accordance with the terms and conditions of this *Approval* and in accordance with the following *Schedules* attached hereto:
- Schedule A - Supporting Documentation
 - Schedule B - Continuous Temperature Monitor
 - Schedule C - *Source Testing* Requirement

2. LIMITED OPERATIONAL FLEXIBILITY

- I. Pursuant to section 20.6 (1) of the *EPA* and subject to Conditions 2.II and 2.III of this *Approval*, future construction, alterations, extensions or replacements are approved in this *Approval* if the future construction, alterations, extensions or replacements are *Modifications* to the *Facility* that:

- I. are within the scope of the operations of the *Facility* as described in the *Description Section* of this *Approval*;
 - II. do not result in an increase of the *Facility Production Limit* above the level specified in the *Description Section* of this *Approval*; and
 - III. result in compliance with the performance limits as specified in Condition 4.
- II. Condition 2.I does not apply to,
- I. the addition of any new *Equipment with Specific Operational Limits* or to the *Modification* of any existing *Equipment with Specific Operational Limits* at the *Facility*; or
 - II. *Modifications* to the *Facility* that would be subject to the *Environmental Assessment Act*.
- III. Condition 2.I of this *Approval* shall expire ten (10) years from the date of this *Approval*, unless this *Approval* is revoked prior to the expiry date. The *Company* may apply for renewal of Condition 2.I of this *Approval* by including an *ESDM Report* and an *Acoustic Assessment Report* that describes the *Facility* as of the date of the renewal application.

3. REQUIREMENT TO REQUEST AN ACCEPTABLE POINT OF IMPINGEMENT CONCENTRATION

- I. Prior to making a *Modification* to the *Facility* that satisfies Condition 2.I.a. and 2.I.b., the *Company* shall prepare a proposed update to the *ESDM Report* to reflect the proposed *Modification*.
- II. The *Company* shall request approval of an *Acceptable Point of Impingement Concentration* for a *Compound of Concern* if the *Compound of Concern* is not identified in the *ACB list* as belonging to the category "Benchmark 1" and a proposed update to an *ESDM Report* indicates that one of the following changes with respect to the concentration of the *Compound of Concern* may occur:
 - I. The *Compound of Concern* was not a *Compound of Concern* in the previous version of the *ESDM Report* and
 - i. the concentration of the *Compound of Concern* exceeds the concentration set out for the contaminant in the *ACB list*; or
 - ii. the *Compound of Concern* is not identified in the *ACB list*; or
 - II. The concentration of the *Compound of Concern* in the updated *ESDM Report* exceeds the higher of,
 - i. the most recent *Acceptable Point of Impingement Concentration*, and
 - ii. the concentration set out for the contaminant in the *ACB list*, if the contaminant is identified in that document.
- III. The request required by Condition 3.II shall propose a concentration for the *Compound of Concern* and shall contain an assessment, performed by a *Toxicologist*, of the likelihood of the proposed concentration causing an adverse effect at *Points of Impingement*.
- IV. If the request required by Condition 3.II is a result of a proposed *Modification* described in Condition 3.I, the *Company* shall submit the request, in writing, to the *Director* at least 30 days prior to commencing to make the *Modification*. The *Director* shall provide written confirmation of receipt of this request to the *Company*.
- V. If a request is required to be made under Condition 3.II in respect of a proposed *Modification* described in Condition 3.I, the *Company* shall not make the *Modification* mentioned in Condition 3.I unless the request is approved in writing by the *Director*.
- VI. If the *Director* notifies the *Company* in writing that the *Director* does not approve the request, the *Company* shall,
 - I. revise and resubmit the request; or
 - II. notify the *Director* that it will not be making the *Modification*.

VII. The re-submission mentioned in Condition 3.VI shall be deemed a new submission under Condition 3.II.

VIII. If the *Director* approves the request, the *Company* shall update the *ESDM Report* to reflect the *Modification*.

IX. Conditions 3 does not apply if Condition 2.I has expired.

4. PERFORMANCE LIMITS

I. Subject to Condition 4.II, the *Company* shall not discharge or cause or permit the discharge of a *Compound of Concern* into the air if,

I. the *Compound of Concern* has a *Ministry Point of Impingement Limit* and the discharge results in the concentration at a *Point of Impingement* exceeding the *Ministry Point of Impingement Limit*; or

II. the *Compound of Concern* is not identified in the *ACB list* as belonging to the category "Benchmark 1" and the discharge results in the concentration at a *Point of Impingement* exceeding the higher of,

i. if an *Acceptable Point of Impingement Concentration* exists, the most recent *Acceptable Point of Impingement Concentration*, and

ii. the concentration set out for the contaminant in the *ACB list*, if the contaminant is identified in that document.

II. Condition 4.I does not apply if the benchmark set out in the *ACB list* has a 10-minute averaging period and no ambient monitor indicates an exceedance at a *Point of Impingement* where human activities regularly occur at a time when those activities regularly occur.

III. The *Company* shall, at all times, ensure that the noise emissions from the *Facility* comply with the limits set out in *Ministry Publication NPC-300*.

IV. The *Company* shall ensure that the vibration emissions from the *Facility* comply with the limits set out in *Ministry Publication NPC-207*.

V. The *Company* shall operate any *Equipment with Specific Operational Limits* approved by this *Approval* in accordance with the *Original ESDM Report* and Condition 5 in this *Approval*.

5. EQUIPMENT WITH SPECIFIC OPERATIONAL LIMITS

I. The *Company* shall ensure that the regenerative thermal oxidizers are designed and operated to comply, at all times, with the following performance requirements:

I. The temperature in the combustion chamber shall be maintained at a minimum of 760 degrees Celsius for the regenerative thermal oxidizer identified as RC-402-1A and 700 degrees Celsius for the regenerative thermal oxidizer identified as RC-402-2, as measured by the continuous monitoring and recording system, throughout the combustion cycle;

II. The residence time of the combustion gases in the combustion chamber shall be not less than 1.70 seconds for both regenerative thermal oxidizers;

III. The concentration of *Organic Matter*, being an average of ten measurements taken at approximately one minute intervals, in the combustion gases emitted into the atmosphere from operating the regenerative thermal oxidizers, shall not be greater than 100 parts per million by volume, measured on an undiluted basis.

6. DOCUMENTATION REQUIREMENTS

I. The *Company* shall maintain an up-to-date *Log*.

II. No later than March 31 in each year, the *Company* shall update the *Acoustic Assessment Report* and shall update the *ESDM Report* in accordance with section 26 of *O. Reg. 419/05* so that the information in the reports is accurate as of December 31 in the previous year.

III. The *Company* shall make the *Emission Summary Table* (see section 27 of *O. Reg. 419/05*) and *Acoustic Assessment Summary Table* available for examination by any person, without charge, by posting it on the Internet or by making it available during regular business

hours at the *Facility*.

- IV. The *Company* shall, within three (3) months after the expiry of Condition 2.I of this *Approval*, update the *ESDM Report* and the *Acoustic Assessment Report* such that the information in the reports is accurate as of the date that Condition 2.I of this *Approval* expired.
- V. Conditions 6.I and 6.II do not apply if Condition 2.I has expired.

7. CONTINUOUS MONITORING

- I. The *Company* shall install and subsequently conduct and maintain a program to continuously monitor:
- I. The temperature in the combustion chamber of each regenerative thermal oxidizers, where the minimum retention time of the combustion gases of not less than 1.70 seconds at minimum temperatures of 760 degrees Celsius for the regenerative thermal oxidizer identified as RC-402-1A and 700 degrees Celsius for the regenerative thermal oxidizer identified as RC-402-2 are achieved.

The continuous monitoring and recording system shall be equipped with continuous recording devices, and shall comply with the requirements outlined in the attached Schedule B.

8. REPORTING REQUIREMENTS

- I. Subject to Condition 8.II, the *Company* shall provide the *Director* no later than June 30 of each year, a *Written Summary Form* to be submitted through the *Ministry's* website that shall include the following:
- I. a declaration of whether the *Facility* was in compliance with section 9 of the *EPA, O. Reg. 419/05* and the conditions of this *Approval*;
- II. a summary of each *Modification* satisfying Condition 2.I.a and 2.I.b that took place in the previous calendar year that resulted in a change in the previously calculated concentration at a *Point of Impingement* for any *Compound of Concern* or resulted in a change in the sound levels reported in the *Acoustic Assessment Summary Table* at any *Point of Reception*.
- II. Condition 8.I does not apply if Condition 2.I has expired.

9. OPERATION AND MAINTENANCE

- I. The *Company* shall prepare and implement, not later than three (3) months from the date of this *Approval*, operating procedures and maintenance programs for all *Processes with Significant Environmental Aspects*, which shall specify as a minimum:
- I. frequency of inspections and scheduled preventative maintenance;
- II. procedures to prevent upset conditions;
- III. procedures to minimize all fugitive emissions;
- IV. procedures to prevent and/or minimize odorous emissions;
- V. procedures to prevent and/or minimize noise emissions; and
- VI. procedures for record keeping activities relating to the operation and maintenance programs.
- II. The *Company* shall ensure that all *Processes with Significant Environmental Aspects* are operated and maintained in accordance with this *Approval*, the operating procedures and maintenance programs.

10. COMPLAINTS RECORDING AND REPORTING

- I. If at any time, the *Company* receives an environmental complaint from the public regarding the operation of the *Equipment* approved by this *Approval*, the *Company* shall take the following steps:
- I. Record and number each complaint, either electronically or in a log book. The record shall

include the following information: the time and date of the complaint and incident to which the complaint relates, the nature of the complaint, wind direction at the time and date of the incident to which the complaint relates and, if known, the address of the complainant.

- II. Notify the *District Manager* of the complaint within two (2) business days after the complaint is received, or in a manner acceptable to the *District Manager*.
- III. Initiate appropriate steps to determine all possible causes of the complaint, and take the necessary actions to appropriately deal with the cause of the subject matter of the complaint.
- IV. Complete and retain on-site a report written within one (1) week of the complaint date. The report shall list the actions taken to appropriately deal with the cause of the complaint and set out steps to be taken to avoid the recurrence of similar incidents.

11. RECORD KEEPING REQUIREMENTS

- I. Any information requested by any employee in or agent of the *Ministry* concerning the *Facility* and its operation under this *Approval*, including, but not limited to, any records required to be kept by this *Approval*, shall be provided to the employee in or agent of the *Ministry*, upon request, in a timely manner.
- II. Unless otherwise specified in this *Approval*, the *Company* shall retain, for a minimum of five (5) years from the date of their creation all reports, records and information described in this *Approval*, including,
 - I. a copy of the *Original ESDM Report* and each updated version;
 - II. a copy of each version of the *Acoustic Assessment Report*;
 - III. supporting information used in the emission rate calculations performed in the *ESDM Reports and Acoustic Assessment Reports*;
 - IV. the records in the *Log*;
 - V. copies of each *Written Summary Form* provided to the *Ministry* under Condition 8.I of this *Approval*;
 - VI. records of maintenance, repair and inspection of *Equipment* related to all *Processes with Significant Environmental Aspects*; and
 - VII. all records related to environmental complaints made by the public as required by Condition 10 of this *Approval*.

12. SOURCE TESTING

- I. The *Company* shall perform *Source Testing* to determine the rates of emissions of the *Test Contaminants* from the *Targeted Sources* listed in Schedule C.
- II. The *Company* shall submit, not later than three (3) months from the date of this *Approval*, to the *Manager* a *Pre-Test Plan* for the *Source Testing* required by the *Source Testing Code*. The *Company* shall finalize the *Pre-Test Plan* in consultation with the *Manager*.
- III. The *Company* shall not perform *Source Testing* required under this *Approval* until the *Manager* has accepted the *Pre-Test Plan*.
- IV. The *Company* shall complete the *Source Testing* not later than three (3) months after acceptance of the *Pre-Test Plan* by the *Manager*, or within a period as directed or agreed by the *District Manager*.
- V. The *Company* shall repeat the *Source Testing* for the sources and contaminants outlined in Schedule C and as directed or agreed by the *District Manager*.
- VI. The *Company* shall notify the *Director*, the *District Manager* and the *Manager* 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*.
- VII. The *Company* shall submit a report, whenever *Source Testing* is completed, on the *Source Testing* to the *Director*, the *District Manager* and the *Manager* not later than three (3) months

after completing the *Source Testing*, or within a period as directed or agreed by the *District Manager*. The report shall be in the format described in the *Source Testing Code*, and shall include, but not be limited to:

- I. an executive summary;
 - II. 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*;
 - III. all operating conditions of the *Facility* including any upset conditions during the *Source Testing*;
 - IV. results of the *Source Testing*;
 - V. results of *Source Testing*, including the emission rate, emission concentration and relevant emission factor of the *Test Contaminants* from the sources listed in Schedule C;
 - VI. a tabular comparison of *Source Testing* results for the sources and *Test Contaminants* listed in Schedule C to original emission estimates described in the *Company's* application and the *Original ESDM Report*.
 - VIII. If the *Source Testing* results indicate the emission estimates are higher than the original emission estimates described in the *Company's* application and the *Original ESDM Report*, the *Company* shall update their *ESDM Report* in accordance with Section 26 of *O. Reg. 419/05* with the emission estimates from the *Source Testing* report and make these records available for review by staff of the *Ministry* upon request. The updated *Emission Summary Table* from the updated *ESDM Report* shall be submitted with the report on the *Source Testing*.
 - IX. The *Director* may not accept the results of the *Source Testing* if:
 - I. the *Source Testing Code* or the requirements of the *Manager* were not followed; or
 - II. the *Company* did not notify the *District Manager* and the *Manager* of the *Source Testing*; or
 - III. the *Company* failed to provide a complete report on the *Source Testing*.
 - X. If the *Director* does not accept the results of the *Source Testing*, the *Director* may require re-testing. If re-testing is required, the *Pre-Test Plan* strategies need to be revised and submitted to the *Manager* for approval. The actions taken to minimize the possibility of the *Source Testing* results not being accepted by the *Director* must be noted in the revision.
- 13. REVOCATION OF PREVIOUS APPROVALS**
- I. This *Approval* replaces and revokes all Certificates of Approval (Air) issued under section 9 *EPA* and Environmental Compliance Approvals issued under Part II.1 *EPA* to the *Facility* in regards to the activities mentioned in subsection 9(1) of the *EPA* and dated prior to the date of this *Approval*.

Schedule A

Supporting Documentation

1. Environmental Compliance Approval Application, dated June 2, 2016, signed by Tammy White and submitted by the *Company*;
2. Emission Summary and Dispersion Modelling Report, prepared by Spencer Bannon / E.K. Gillin & Associates and dated December 2016;
3. *Acoustic Assessment Report*, prepared by Spencer Bannon / E.K. Gillin & Associates and dated June 2, 2016; and
4. Revised result tables for the *Acoustic Assessment Report* provided on July 5, 2016.

Schedule B

Continuous Temperature Monitor

PARAMETER: TEMPERATURE

LOCATION:

The sample point for the continuous temperature monitoring and recording system shall be located in the combustion chamber at a location where the measurements are representative of a retention time of 1.70 seconds in the combustion chamber of the regenerative thermal oxidizers.

PERFORMANCE:

The Continuous Temperature Monitor shall meet the following minimum performance specifications for the following parameters:

PARAMETERS	SPECIFICATION
Type	shielded "K" type thermocouple, or equivalent
Accuracy	± 1.5 percent of the minimum gas temperature

DATA RECORDER:

The data recorder must be capable of registering continuously the measurement of the monitor without a significant loss of accuracy and with a time resolution of 1 minutes or better.

RELIABILITY:

The monitor shall be operated and maintained so that accurate data is obtained during a minimum of 95 percent of the time for each calendar quarter.

Schedule C

Source Testing Requirements

Targeted Sources:

Source ID	Source Description
CC-401	Condenser Degreaser Stack
RC-402-1A	Radiator Degreaser Stack (Thermal Oxidizer)
RC-402-2	Radiator Degreaser 2 Stack (Thermal Oxidizer)

Test Contaminants:

CAS Number	Test Contaminants
75782-86-4	Alcohol Ethoxylate
64742-47-8	Hydrotreated Distillate
68990-52-3	Methyl Ester

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

1. GENERAL

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

2. LIMITED OPERATIONAL FLEXIBILITY, REQUIREMENT TO REQUEST AN ACCEPTABLE POINT OF IMPINGEMENT CONCENTRATION AND PERFORMANCE LIMITS

Conditions No. 2, 3 and 4 are included to limit and define the *Modifications* permitted by this *Approval*, and to set out the circumstances in which the *Company* shall request approval of an *Acceptable Point of Impingement Concentration* prior to making *Modifications*. The holder of the *Approval* is approved for operational flexibility for the *Facility* that is consistent with the description of the operations included with the application up to the *Facility Production Limit*. In return for the operational flexibility, the *Approval* places performance based limits that cannot be exceeded under the terms of this *Approval*. *Approval* holders will still have to obtain other relevant approvals required to operate the *Facility*, including requirements under other environmental legislation such as the *Environmental Assessment Act*.

3. EQUIPMENT WITH SPECIFIC OPERATIONAL LIMITS

Condition No. 5 is included to outline the specific operational limits considered necessary to prevent an adverse effect resulting from the operation of the regenerative thermal oxidizers. This Condition is also included to emphasize that the regenerative thermal oxidizers must be operated according to a procedure that will result in compliance with the *EPA*, the regulations and this *Approval*.

4. DOCUMENTATION REQUIREMENTS

Condition No. 6 is included to require the *Company* to maintain ongoing documentation that demonstrates compliance with the performance limits as specified in Condition 4 of this *Approval* and allows the *Ministry* to monitor on-going compliance with these performance limits. The *Company* is required to have an up to date *ESDM Report* and *Acoustic Assessment Report* that describe the *Facility* at all times and make the *Emission Summary Table* and *Acoustic Assessment Summary Table* from these reports available to the public on an ongoing basis in order to maintain public communication with regard to the emissions from the *Facility*.

5. CONTINUOUS MONITORING

Condition No. 7 is included to require the *Company* to gather accurate information on a continuous basis so that compliance with the *EPA*, the regulations and this *Approval* can be verified.

6. REPORTING REQUIREMENTS

Condition No. 8 is included to require the *Company* to provide a yearly *Written Summary Form* to the *Ministry*, to assist the *Ministry* with the review of the site's compliance with the *EPA*, the regulations and this *Approval*.

7. OPERATION AND MAINTENANCE

Condition No. 9 is included to require the *Company* to properly operate and maintain the *Processes with Significant Environmental Aspects* to minimize the impact to the environment from these processes.

8. COMPLAINTS RECORDING AND REPORTING PROCEDURE

Condition No. 10 is included to require the *Company* to respond to any environmental complaints regarding the operation of the *Equipment*, according to a procedure that includes methods for preventing recurrence of similar incidents and a requirement to prepare and retain a written report.

9. RECORD KEEPING REQUIREMENTS

Condition No. 11 is included to require the *Company* to retain all documentation related to this *Approval* and provide access to employees in or agents of the *Ministry*, upon request, so that the *Ministry* can determine if a more detailed review of compliance with the performance limits as specified in Condition No. 4 of this *Approval* is necessary.

10. **SOURCE TESTING**

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

11. **REVOCATION OF PREVIOUS APPROVALS**

Condition No. 13 is included to identify that this *Approval* replaces all Section 9 Certificate(s) of Approval and Part II.1 Approvals in regards to the activities mentioned in subsection 9(1) of the *EPA* and dated prior to the date of this *Approval*.

Upon issuance of the environmental compliance approval, I hereby revoke Approval No(s). 1689-83CLJB issued on August 9, 2011.

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

1. The portions of the environmental compliance approval or each term or condition in the environmental compliance approval in respect of which the hearing is required, and;
2. The grounds on which you intend to rely at the hearing in relation to each portion appealed.

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

The Notice should also include:

3. The name of the appellant;
4. The address of the appellant;
5. The environmental compliance approval number;
6. The date of the environmental compliance approval;
7. The name of the Director, and;
8. The municipality or municipalities within which the project is to be engaged in.

And the Notice should be signed and dated by the appellant.

This Notice must be served upon:

The Secretary*
Environmental Review
Tribunal
655 Bay Street, Suite

The Environmental
Commissioner
AND 1075 Bay Street, Suite
605

The Director appointed for the
purposes of Part II.1 of the
AND Environmental Protection Act
Ministry of the Environment and

1500
Toronto, Ontario
M5G 1E5

Toronto, Ontario
M5S 2B1

Climate Change
135 St. Clair Avenue West, 1st
Floor
Toronto, Ontario
M4V 1P5

*** Further information on the Environmental Review Tribunal's requirements for an appeal can be obtained directly from the Tribunal at: Tel: (416) 212-6349, Fax: (416) 326-5370 or www.ert.gov.on.ca**

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

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

DATED AT TORONTO this 11th day of April, 2017

Rudolf Wan, P.Eng.
Director
appointed for the purposes of Part II.1 of
the *Environmental Protection Act*

JG/
c: District Manager, MOECC Guelph
Spencer Bannon, E.K. Gillin & Associates



Ministry of the Environment
Ministère de l'Environnement

AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 1704-8W3HRC

Issue Date: July 26, 2012

The TDL Group Corp./Groupe TDL Corporation
950 Southgate Dr
Guelph, Ontario
N1L 1S7

Site Location: 950 Southgate Road
950 Southgate Rd
Guelph City, County of Wellington
N1L 1S7

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) diesel generators, used for electricity generation during hours of peak demand (i.e., peak shaving), having a
maximum power rating of 1750 kilowatts and equipped with a Selective Catalytic Reducer system, exhausting
into the atmosphere through a stack, having an exit diameter of 0.42 metre;
- one (1) diesel generators, used for electricity generation during hours of peak demand (i.e., peak shaving), having a
maximum power rating of 900 kilowatts and equipped with a Selective Catalytic Reducer system, exhausting
into the atmosphere through a stack, having an exit diameter of 0.31 metre;

all in accordance with the Application for Approval (Air & Noise) dated October 19, 2011 and signed by Bruce Dimmel, (VP National Distribution), The TDL Group Corp./Groupe TDL Corporation, and all supporting information associated with the application including Emission Summary and Dispersion Modelling Report provided by A.J.Chandler & Associates Ltd., dated October 5, 2011, and signed by John Chandler.

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 JE Coulter Associates Limited, dated September 30, 2011 and signed by John Coulter;
2. "Approval" means this Environmental Compliance Approval, including the application and all supporting information associated with it;
3. "Company" means The TDL Group Corp./Groupe TDL Corporation;

4. "Director" means a person appointed by the Minister pursuant to section 5 of the EPA;
5. "District Manager" means the District Manager, Guelph District Office, West Central Region of the Ministry;
6. "EPA" means the Environmental Protection Act, R.S.O. 1990, c.E.19, as amended;
7. "Equipment" means 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;
8. "ESDM Report" means the Emission Summary and Dispersion Modelling Report dated October 5, 2011 submitted in support of the application;
9. "Facility" means the entire operation located on the property where the Equipment is located;
10. "Manager" means the Manager, Technology Standards Section, Standards Development Branch, or any other person who represents and carries out the duties of the Manager, Technology Standards Section, Standards Development Branch, as those duties relate to the conditions of this Approval;
11. "Manual" means a document or a set of documents that provide written instructions to staff of the Company;
12. "Ministry" means ministry of the government of Ontario responsible for the EPA and includes all officials, employees or other persons acting on its behalf;
13. "Noise Control Measures" means measures to reduce the noise emissions from the Facility and/or Equipment including, but not limited to, silencers, acoustic louvres, enclosures, absorptive treatment, plenums and barriers, described in the Company's application, and in the supporting documentation referred to herein, including the Acoustic Assessment Report, to the extent approved by this Approval;
14. "Peak Shaving Generator" means the 1750 kilowatt and the 900 kilowatt generators, used for electricity generation during hours of peak demand, described in this Approval and in the supporting documentation submitted with the application;
15. "Pre-Test Plan" means a plan for the Source Testing including the information required in Section 1.1 of the Source Testing Code;
16. "Publication NPC-205" means the Ministry Publication NPC-205, "Sound level Limits for Stationary Sources in Class 1 & 2 Areas (Urban)", October, 1995 as amended;
17. "Publication NPC-233" means the Ministry Publication NPC-233, "Information to be Submitted for Approval of Stationary Sources of Sound", October, 1995 as amended;
18. "Source Testing" means sampling and testing to measure emissions resulting from operating the Equipment at a level of typical maximum production within the approved operating range of the Equipment which satisfies paragraph 1 of subsection 11(1) of O. Reg. 419/05;
19. "Source Testing Code" means the Source Testing Code, Version 2, Report No. ARB-66-80, dated November 1980, prepared by the Ministry, as amended;
20. "Targeted Sources" means the Peak Shaving Generator; and
21. "Test Contaminants" means the following contaminants: Nitrogen Oxides (expressed as nitrogen dioxide equivalent), Suspended Particulate Matter, Non-Methane Hydrocarbons (total hydrocarbons excluding methane), and Carbon Monoxide.
- 22.

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. The Company shall:

(1) fully implement the Noise Control Measures specified in the Acoustic Assessment Report prior to commencement of operation of the Equipment;

(2) ensure, subsequent to the completion of the Noise Control Measures, that the noise emissions from the Facility comply with the limits set out in Ministry Publication NPC-205 ; and

(3) ensure that the Noise Control Measures are properly maintained and continue to provide the acoustical performance outlined in the Acoustic Assessment Report.

2. The Company shall ensure that the fuel used to operate the Peak Shaving Generator contains a maximum sulphur content of no more than fifteen (15) parts per million.

3. The Company shall ensure that the Equipment is properly operated and maintained at all times. The Company shall:

(1) 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:

(a) routine operating and maintenance procedures in accordance with good engineering practices and as recommended by the Equipment suppliers;

(b) emergency procedures;

(c) procedures for any record keeping activities relating to operation and maintenance of the Equipment; and

(d) all appropriate measures to minimize noise and odorous emissions from all potential sources;

(2) implement the recommendations of the Manual; and

(3) retain, for a minimum of two (2) years from the date of their creation, all records on the maintenance, repair and inspection of the Equipment, and make these records available for review by staff of the Ministry upon request.

4.1 The Company shall perform Source Testing to determine the rate of emission of the Test Contaminants from the Targeted Sources.

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

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

4.4 The Company shall complete the Source Testing not later than three (3) months after the Manager

has approved the Pre-Test Plan.

4.5 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.

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

- (1) an executive summary;
- (2) an identification of the applicable North American Industry Classification System code (NAICS) for the facility;
- (3) records of operating conditions at the time of Source Testing;
- (4) results of Source Testing, including the emission rate, emission concentration, and relevant emission factor of the Test Contaminants from the Targeted Sources; and
- (5) a tabular comparison of Source Testing results for the Targeted Sources and Test Contaminants to original emission estimates described in the Company's application and the ESDM Report.

4.7 The Director may not accept the results of the Source Testing if:

- (1) the Source Testing Code or the requirements of the Manager were not followed;
- (2) the Company did not notify the Manager, the District Manager and Director of the Source Testing;
or
- (3) the Company failed to provide a complete report on the Source Testing.

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

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

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

1. Condition No. 1 is included to provide the minimum performance requirement considered necessary to prevent an adverse effect resulting from the operation of the Facility.

2. Condition Nos. 2 and 3 are 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.

In addition, the Company is required 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.

3. Condition No. 4 included to require the Company to gather and retain accurate information 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). 8704-6FRRUG issued on September 8, 2005.

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

1. The portions of the environmental compliance approval or each term or condition in the environmental compliance approval in respect of which the hearing is required, and;
2. The grounds on which you intend to rely at the hearing in relation to each portion appealed.

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

The Notice should also include:

3. The name of the appellant;
4. The address of the appellant;
5. The environmental compliance approval number;
6. The date of the environmental compliance approval;
7. The name of the Director, and;
8. The municipality or municipalities within which the project is to be engaged in.

And the Notice should be signed and dated by the appellant.

This Notice must be served upon:

The Secretary*
Environmental Review
Tribunal
655 Bay Street, Suite
1500
Toronto, Ontario
M5G 1E5

AND

The Environmental
Commissioner
1075 Bay Street, Suite
605
Toronto, Ontario
M5S 2B1

AND

The Director appointed for the
purposes of Part II.1 of the
Environmental Protection Act
Ministry of the Environment
2 St. Clair Avenue West, Floor
12A
Toronto, Ontario
M4V 1L5

*** Further information on the Environmental Review Tribunal's requirements for an appeal can be obtained directly from the Tribunal at: Tel: (416) 212-6349, Fax: (416) 314-4506 or**

www.ert.gov.on.ca

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

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

DATED AT TORONTO this 26th day of July, 2012

Ian Parrott, P.Eng.
Director
appointed for the purposes of Part II.1 of
the *Environmental Protection Act*

AA/

c: District Manager, MOE Guelph District Office
Bruce Dimmel, The TDL Group Corp./Groupe TDL Corporation



CERTIFICATE OF APPROVAL

AIR

NUMBER 4520-7MZU7N

Issue Date: January 28, 2009

Oskam Welding & Machine Ltd.
40 Rutherford Court
Guelph, Ontario
N1G 4N5

Site Location: 40 Rutherford Court
Guelph City, County of Wellington
N1G 4N5

You have applied in accordance with Section 9 of the Environmental Protection Act for approval of:

Custom steel fabrication facility including the following equipment:

- eighteen (18) portable welders, one (1) plasma cutter and portable torch cutters;
- one (1) roof mounted exhaust fan serving the welding area, discharging into the atmosphere at a maximum volumetric flowrate of 0.84 cubic metre per second, through a stack, having the exit dimensions of 0.89 metre by 0.89 metre, extending 0.41 metre above the roof and 7.41 metres above grade;
- one (1) roof mounted exhaust fan serving the welding area, discharging into the atmosphere at a maximum volumetric flowrate of 0.52 cubic metre per second, through a stack, having the exit dimensions of 0.56 metre by 0.56 metre, extending 0.41 metre above the roof and 7.41 metres above grade;
- one (1) roof mounted exhaust fan serving the welding area, discharging into the atmosphere at a maximum volumetric flowrate of 1.44 cubic metres per second, through a stack, having the exit dimensions of 0.81 metre by 0.81 metre, extending 0.41 metre above the roof and 7.41 metres above grade;
- one (1) roof mounted exhaust fan serving the welding area, discharging into the atmosphere at a maximum volumetric flowrate of 3.60 cubic metres per second, through a stack, having the exit dimensions of 0.61 metre by 0.61 metre, extending 1.63 metres above the roof and 8.63 metres above grade;
- one (1) paint spray booth, equipped with a dry filtration system, and with two (2) natural gas fired heaters with a total heat input of 101,300 kilojoules per hour; discharging into the atmosphere at a volumetric flow rate of 6.13 cubic metres per second, through a stack measuring 0.97 metre in diameter, 1.0 metre above the roof and 6.03 metres above grade; and
- one (1) natural gas fired HVAC unit, and thirteen (13) natural gas fired infrared heaters, having a total heat input of 1,427,000 kilojoules per hour;

all in accordance with the Applications for a Certificate of Approval (Air) dated March 3, 2007, and signed by John Oskam, President, Oskam Welding & Machine Ltd., and all supporting information associated with the application.

For the purpose of this Certificate of Approval and the terms and conditions specified below, the following definitions apply:

1. "Act" means the Environmental Protection Act;
2. "Certificate" means this Certificate of Approval issued in accordance with the Act;

3. "Company" means Oskam Welding & Machine Ltd.;
4. "District Manager" means the District Manager, Guelph District Office, West Central Region of the Ministry;
5. "Equipment" means the exhaust systems, welders, cutters, and paint spray booth described in the Company's application, this Certificate and in the supporting documentation referred to herein, to the extent approved by this Certificate;
6. "Facility" means the entire operation located on the property where the Equipment is located;
7. "Manual" means a document or a set of documents that provide written instructions to staff of the Company;
8. "Ministry" means the Ontario Ministry of the Environment;
9. "Publication NPC-205" means Ministry Publication NPC-205 "Sound Level Limits for Stationary Sources in Class 1 & 2 Areas (Urban)", October 1995 as amended; and
10. "Publication NPC-232" means Ministry Publication NPC-232 "Sound Level Limits for Stationary Sources in Class 3 Areas (Rural)", October 1995 as amended.

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

TERMS AND CONDITIONS

OPERATION AND MAINTENANCE

1. The Company shall ensure that the Facility is properly operated and maintained at all times. The Company shall:
 - (1) prepare, before commencement of operation of the Equipment, and update, as necessary, a Manual outlining the operating procedures and a maintenance program for the Equipment, including:
 - (a) routine operating and maintenance procedures in accordance with good engineering practices and as recommended by the equipment suppliers;
 - (b) emergency procedures;
 - (c) procedures for any record keeping activities relating to operation and maintenance of the Equipment;
 - (d) all appropriate measures to minimize odour, noise and dust emissions from all potential sources from the Facility; and
 - (2) implement the recommendations of the operating and maintenance Manual.

RECORD RETENTION

2. 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 operation and maintenance activities required by this Certificate. These records as well as the Manual shall be made available to staff of the Ministry upon request. The Company shall retain:
 - (1) all records on the maintenance, repair and inspection of the Equipment; and
 - (2) all records on the environmental complaints, including:
 - (a) a description, time and date of each incident;

(b) operating conditions at the time of the incident; and

(c) a description of the measures taken to address the cause of the incident and to prevent a similar occurrence in the future.

NOTIFICATION OF COMPLAINTS

3. 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:

(1) a description of the nature of the complaint; and

(2) the time and date of the incident to which the complaint relates.

PERFORMANCE

4. The Company shall ensure that the noise emissions from the Facility comply with the limits set in Publication NPC-205 or NPC-232 as applicable.

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 Act, the Regulations and this Certificate.

2. Condition No. 2 is included to require the Company to keep records and to provide information to staff of the Ministry so that compliance with the Act, the Regulations and this Certificate can be verified.

3. Condition No. 3 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.

4. Condition No. 4 is included to provide minimum performance requirements considered necessary to prevent an adverse effect resulting from the operation of the Facility.

In accordance with Section 139 of the Environmental Protection Act, R.S.O. 1990, Chapter E-19, as amended, you may by written Notice served upon me, the Environmental Review Tribunal and in accordance with Section 47 of the Environmental Bill of Rights, S.O. 1993, Chapter 28, the Environmental Commissioner, within 15 days after receipt of this Notice, require a hearing by the Tribunal. The Environmental Commissioner will place notice of your appeal on the Environmental Registry. Section 142 of the Environmental Protection Act, provides that the Notice requiring the hearing shall state:

1. The portions of the approval or each term or condition in the approval in respect of which the hearing is required, and;
2. The grounds on which you intend to rely at the hearing in relation to each portion appealed.

The Notice should also include:

3. The name of the appellant;
4. The address of the appellant;
5. The Certificate of Approval number;
6. The date of the Certificate of Approval;
7. The name of the Director;
8. The municipality within which the works are located;

And the Notice should be signed and dated by the appellant.

This Notice must be served upon:

CONTENT COPY OF ORIGINAL

The Secretary*
Environmental Review Tribunal
655 Bay Street, 15th Floor
Toronto, Ontario
M5G 1E5

AND

The Environmental Commissioner
1075 Bay Street, 6th Floor
Suite 605
Toronto, Ontario
M5S 2B1

AND

The Director
Section 9, *Environmental Protection Act*
Ministry of the Environment
2 St. Clair Avenue West, Floor 12A
Toronto, Ontario
M4V 1L5

*** Further information on the Environmental Review Tribunal's requirements for an appeal can be obtained directly from the Tribunal at: Tel: (416) 314-4600, Fax: (416) 314-4506 or www.ert.gov.on.ca**

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

The above noted works are approved under Section 9 of the Environmental Protection Act.

DATED AT TORONTO this 28th day of January, 2009

Ian Greason, P.Eng.
Director

SG/
c: District Manager, MOE Guelph
Jennifer Kellett, Premier Environmental Services Inc.



Ministry of the Environment, Conservation and Parks
Operations Division

Confirmation of Registration

Registration Number: R-010-9112817681

Version Number: 001

Date Registration Filed: Jan 07, 2021 08:36:36 AM

Dear Sir/Madam,

SLEEMAN BREWERIES LTD./LES

551 CLAIR Road West
GUELPH ON N1L 0H7

You have registered, in accordance with Section 20.21(1) (a) of the *Environmental Protection Act*, the use, operation, construction, alteration, extension or replacement of any plant, structure, equipment, apparatus, mechanism or thing that is located at the facility noted below, or the alteration of a process or rate of production at the facility, including the activities set out in schedule 'A'.

551 CLAIR W RD GUELPH ON N1L 1E9

Please note that the facility noted above is subject to the applicable provisions of O. Reg. 245/11, and O. Reg. 1/17.

The activity related information provided during the registration process is included as part of the confirmation of registration as schedule 'A'.

Dated on Jan 07, 2021

Director

Environmental Approvals Access and Service Integration Branch
Ministry of the Environment, Conservation and Parks
135 St. Clair Avenue West, 1st Floor
Toronto ON M4V 1P5

Any questions related to this registration and the Environmental Activity and the Sector Registry should be directed to:

Ministry of the Environment, Conservation and Parks

Customer Service Representative

Environmental Approvals Access and Service Integration Branch

Phone:(416) 314-8001

Toll free: 1-800-461-6290

Schedule 'A'

Part 3 - Activity Information

3.1 Industry Eligibility Check

a. Please select the facility's primary North American Industry Classification System (NAICS) code. 312120

b. Does the facility have any other applicable NAICS codes? ☐ Yes ☒ No

b. i. If yes, please select the facility's secondary NAICS code(s), and confirm any other applicable NAICS code(s).

c. Are you engaged in an activity at the facility that may discharge or from which may be discharged a contaminant into any part of the natural environment other than water? ☒ Yes ☐ No

d. Is the activity exempt from requiring an Environmental Compliance Approval (ECA) under section 9 (1) of the Environmental Protection Act (EPA) other than an activity that has been prescribed by an EASR regulation under Part II.2 of the Act? ☐ Yes ☒ No

e. Are the only activities engaged in at the facility, other than activities described in question 3.1d above, prescribed under a single other EASR regulation? ☐ Yes ☒ No

f. Is an alternative low-carbon fuel site within the meaning of Ontario Regulation (O. Reg.) 79/15 (Alternative Low-Carbon Fuels) operated at the facility? ☐ Yes ☒ No

g. Is the activity a renewable energy project as defined in the EPA? ☐ Yes ☒ No

h. Is an end-of-life vehicle waste disposal site within the meaning of O. Reg. 85/16 operated at the facility? ☐ Yes ☒ No

3.2 Facility Related Information

a. Has a site-specific air standard ever been set for a contaminant discharged from the facility? (section 35 of O. Reg. 419/05 (Air Pollution -- Local Air Quality)) ☐ Yes ☒ No

b. Has a person ever been registered in the Ministry's Technical Standards Registry – Air Pollution under section 39 of O. Reg. 419/05 (Air Pollution – Local Air Quality) in respect of the facility? ☐ Yes ☒ No

c. Do all of the activities to be registered occur exclusively at the site? ☒ Yes ☐ No

Please Note: Discrete activities that involve the use of equipment that is intended to be moved from one site to another to perform the same function (such as the use of mobile rock crushing equipment or mobile PCB destruction equipment) are not prescribed for the purpose of the Environmental Activity and Sector Registry, and an Environmental Compliance Approval may be required.

d. Is the facility located on a property that has been deemed a single property under subsection 4 (2) of O. Reg. 419/05? ☐ Yes ☒ No

e. Is the facility located in an area of development control within the Niagara Escarpment Planning Area? ☐ Yes ☒ No

e. i. If yes, has a development permit required under section 24 of the Niagara Escarpment Planning and Development Act (NEPDA) in respect of the facility been issued? ☐ Yes ☐ No

f. Is there a landfilling site that is no longer permitted to accept waste for disposal located on the site on which the facility is located? ☐ Yes ☒ No

g. Is the activity part of an undertaking to which the Environmental Assessment Act applies? ☐ Yes ☒ No

g. i. If yes, is one or more of the following conditions met: ☐ Yes ☐ No

- All class EA requirements have been completed, including decisions on any Part II order requests; OR

- The facility has received approval to proceed with the undertaking.

h. Please provide a description of the facility. The description should include a summary of operations and activities at the facility that discharge contaminants, as well as what is produced, if applicable.

Sleeman Breweries Ltd. has a plant located in Guelph, Ontario. The facility processes and bottles beer and distributes the finished product. Malt, hops, yeast and water are combined in various formulations using various tanks to produce beer for consumption. Yeast is grown from wort in a closed loop.

After the beer is produced bottles, cans and kegs are then filled and capped or sealed in the separate production areas. Processes that require steam include the pasteurizer, bottle washer, flash pasteurizer, the brew house kettle, mash mixer, cereal cooler, hot water tank, and sterilizer. The EASR is for: 1) the installation of a new exhaust fan and stack serving the keg washer line; 2) the installation of three upblast area exhaust fans serving the ammonia room, exhausting to atmosphere; 4) the installation of one upblast area exhaust fan serving the low pressure ammonia room; 3) the installation of two emergency ammonia passive relief vents; 5) the replacement of three existing cooling towers; 6) the removal of one existing cooling tower (#4); 7) the installation of two area upblast exhaust fans serving the shrink wrap tunnel area in the can line; 8) the installation of one lab fumehood serving the wastewater treatment area; 9) the installation of one new inline exhaust fan serving the brewing chemical mixing station area (chemical storage); 10) the installation of two area dome exhaust fans serving the can line; 11) the installation of two passive exhaust vents serving the grain silos; 12) the installation of one dome exhaust fan serving the yeast room; 13) the replacement of one upblast exhaust fan serving the bottle washer with an new exhaust fan; 14) the changing of one dome exhaust with an upblast exhaust serving the bottle washing are; 15) the replacement of one upblast exhaust fan serving the renovator area with an exhaust fan; 16) the addition or replacement of various outdoor storage tanks used for the aging and fermenting of beer; 17) the removal or decommissioning of various process equipment and exhaust that are no longer there and; 18) the removal, replacement or addition of various comfort heating units. Heating systems used for comfort heat were previously registered in the Environmental Activity and Sector Registry (EASR), as per Ontario Regulation 419, section 8 in 2012, Registration number R-003-9105321042. A natural gas fired standby power system (generator) was also registered in 2012, Registration number R-002-6105408735.

i. Please enter the date on which the facility commenced or will commence operations.

1988-06-01

j. Is the facility located in a multi-tenant building?

☐ Yes ☒ No

3.3 Activity Related Information

a. Does the land disposal of waste as defined in Regulation 347 General – Waste Management occur at the facility?

☐ Yes ☒ No

b. Does the facility process or dispose of waste by way of thermal treatment, other than the thermal treatment of wood fuel that meets the specifications in Chapter 5 of the EASR publication in a wood-fired combustor?

☐ Yes ☒ No

c. Does the facility use a wood-fired combustor?

☐ Yes ☒ No

c. i. If yes, does the wood-fired combustor have a nominal load heat input capacity of less than 3 megawatts?

☐ Yes ☐ No

c. ii. If yes, was the wood-fired combustor installed at the facility on or after January 31, 2017?

☐ Yes ☐ No

c. iii. If yes, does the wood-fired combustor exclusively use one or more of the following as fuel:

- Wood chips that meet the specifications set out in Chapter 5 of the EASR publication.
- Wood briquettes that meet the specifications set out in Chapter 5 of the EASR publication.
- Wood pellets that meet the specifications set out in Chapter 5 of the EASR publication.

☐ Yes ☐ No

d. Does the facility have any plating processes that use cadmium, cyanide, chromium or nickel, including chrome plating, electroplating or electroless plating?

☐ Yes ☒ No

e. Is an electrolytic stripping process that removes cadmium, chromium or nickel from an object used at the facility?

☐ Yes ☒ No

f. Are metals processed outdoors at the facility, including torching, shearing, shredding or plasma cutting, other than for the purpose of routine maintenance carried out at the facility on any plant, structure, equipment, apparatus or thing?

☐ Yes ☒ No

g. Is a fossil-fuel electric power generation facility with a maximum electrical power output capacity equal to or greater than 25 megawatts operated at the facility?

☐ Yes ☒ No

h. Is a combustion source that uses biogas, biomass, coal, petroleum coke or waste as a fuel, or that uses a fuel derived from biogas, biomass, coal, petroleum coke or waste other than a small wood-fired combustor operated at the facility?

☐ Yes ☒ No

i. Is a combustion turbine used at the facility?

☐ Yes ☒ No

Part 4 - Operational Information

4.1 Air

a. Does the EASR Emission Summary and Dispersion Modelling (ESDM) Report provide for modifications that have not yet been implemented at the facility?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
a. i. If yes, please provide the date on which the modifications will be completed.	2021-02-26	
b. Has an instrument under O. Reg. 419/05 been issued in respect of the facility?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
b. i. If yes, what type(s) of instruments (including any notices, orders or approvals) has (have) been issued? (select all that apply)		
ss. 7(1) Specified Dispersion Models	<input type="checkbox"/>	
ss. 8(2) Negligible Sources	<input type="checkbox"/>	
ss. 10(2) Operating Conditions	<input type="checkbox"/>	
ss. 11(2) Refined Emission Rates	<input type="checkbox"/>	
ss. 13.1 Value of Dispersion Modelling Parameters	<input type="checkbox"/>	
ss. 13(1) Meteorological Data	<input type="checkbox"/>	
ss. 14(6) Area of Modelling Coverage	<input type="checkbox"/>	
ss. 20(5) Speed-up Order	<input type="checkbox"/>	
Other	<input type="checkbox"/>	
List all that have been issued		
c. To what standard did the licensed engineering practitioner assess compliance of the facility's emissions (please select the applicable box(es)):		
Section 19 of O. Reg. 419/05 (Schedule 2)	<input type="checkbox"/>	
Section 20 of O. Reg. 419/05 (Schedule 3)	<input checked="" type="checkbox"/>	
N/A – The amount of any contaminant discharged from the site is negligible	<input type="checkbox"/>	
N/A – Source(s) discharge only sound as a contaminant	<input type="checkbox"/>	
N/A – Source(s) discharge sound as a contaminant and the amount of any other contaminant discharged is negligible	<input type="checkbox"/>	
d. Please select all applicable boxes that apply to a discharge of a contaminant(s) to air from the facility:		
Contaminant(s) belonging to Benchmark 1 category of ACB list is at or below the concentration for each specified averaging period set out for the contaminant	<input checked="" type="checkbox"/>	
Contaminant(s) belonging to Benchmark 1 category of ACB list is above the concentration for a specified averaging period set out for the contaminant By exceeding a Benchmark 1 contaminant limit(s), you must also notify your local District Office and take appropriate action in accordance with Reg. 419/05. Please see https://www.ontario.ca/page/rules-air-quality-and-pollution#section-4 for more details under "Notification of Exceedances".	<input type="checkbox"/>	
Contaminant(s) belonging to Benchmark 2 category of ACB list is at or below the concentration for each specified averaging period set out for the contaminant	<input checked="" type="checkbox"/>	

Contaminant(s) belonging to Benchmark 2 category of ACB list is above the concentration for a specified averaging period set out for the contaminant	<input type="checkbox"/>
The concentration of the contaminant(s) does not have a Ministry standard, guideline, or screening level set out for the contaminant	<input type="checkbox"/>
N/A – The amount of any contaminant discharged from the site is negligible	<input type="checkbox"/>
N/A – Source(s) discharge only sound as a contaminant	<input type="checkbox"/>
N/A – Source(s) discharge sound as a contaminant and the amount of any other contaminant discharged is negligible	<input type="checkbox"/>
e. Does the facility operate a generator for non-emergency purposes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
f. Does the facility use or operate a large boiler or heater greater than 10.5 gigajoules per hour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
g. Will an Emissions Summary Table be uploaded? <i>Please Note: An Emissions Summary Table is required to be uploaded at the time of registration. An Emissions Summary Table is also required to be uploaded if any modifications to the facility require an update to the EASR ESDM. Additionally, as part of the 10 year review required by O. Reg. 1/17, an updated Emissions Summary Table is required to be uploaded.</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

h. Please provide the Name(s) and Licence Number(s) of the Licensed Engineering Practitioner(s) that signed and sealed the EASR ESDM Report and made statements in the EASR ESDM Report Supplement and the date signed.

First Name	Last Name	Licence Number(s)	Date Signed
Andrew	Lane-Smith	90281981	2020-12-07

4.2 Fugitive Dust Control

a. Does the EASR ESDM Report prepared for the facility identify a source of fugitive dust?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
a. i. If yes, has a licensed engineering practitioner signed and sealed a Best Management Practice Plan (BMPP) for fugitive dust control?	<input type="checkbox"/> Yes <input type="checkbox"/> No
b. Has a BMPP for fugitive dust control been prepared as a result of a written notice from the Director issued under O. Reg. 1/17?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

c. Please provide the Name(s) and Licence Number(s) of the Licensed Engineering Practitioner(s) that signed and sealed the BMPP for fugitive dust control and the date signed and sealed.

First Name	Last Name	Licence Number(s)	Date Signed

4.3 Noise

a. Please select the noise assessment method that was completed for the facility:

The facility meets the 1000m setback distance	<input type="checkbox"/>
Primary Noise Screening Method	<input type="checkbox"/>
Secondary Noise Screening Method	<input type="checkbox"/>
Acoustic Assessment Report	<input checked="" type="checkbox"/>

a. i. If the Primary Noise Screening Method was used, is the actual separation distance from the facility to the closest Point of Noise Reception equal to or greater than the minimum separation distance as determined by the Primary Noise Screening Method?	<input type="checkbox"/> Yes <input type="checkbox"/> No
a. ii. If the Secondary Noise Screening Method was used, is the combined sound level from the facility at each affected Point of Noise Reception as determined by the Secondary Noise Screening Method less than or equal to the applicable sound level limit set out in Chapter 3 of the EASR publication?	<input type="checkbox"/> Yes <input type="checkbox"/> No

a. iii. If an acoustic assessment was completed, did the acoustic assessment determine that the combined sound level from the facility at each affected Point of Noise Reception less than or equal to of the applicable sound level limit set out in Chapter 3 of the EASR publication? ☒ Yes ☐ No

a. iii. a) If no, has a Noise Abatement Action Plan been developed for the facility? ☐ Yes ☐ No

a. iii. b) If yes, please provide the title of the Noise Abatement Action Plan and the date it was prepared.

Name of NAAP	Date Prepared

b. Has an Acoustic Audit Report been prepared as a result of a written notice from the Director? ☐ Yes ☒ No

b. i. If yes, please provide the Name(s) and Licence Number(s) of the Licensed Engineering Practitioner(s) that signed and sealed the acoustic audit report, and the date signed and sealed.

First Name	Last Name	Licence Number(s)	Date Signed

c. Will an Acoustic Assessment Summary Table be uploaded? ☒ Yes ☐ No

Please Note: An Acoustic Assessment Summary Table is required to be uploaded at the time of registration if an Acoustic Assessment was completed for the facility. An Acoustic Assessment Summary Table is also required to be uploaded if any modifications to the facility require an update to the facility's noise report. Additionally, as part of the 10 year review required by O. Reg. 1/17, an updated Acoustic Assessment Summary Table is required to be uploaded.

d. Please provide the Name(s) and Licence Number(s) of the Licensed Engineering Practitioner(s) that signed and sealed the noise report, and the date signed and sealed.

First Name	Last Name	Licence Number(s)	Date Signed
Antje	Hurlburt	100077333	2020-12-17

4.4 Odour

a. Did the Odour Screening Report indicate that a circumstance which requires a BMPP for odour to be prepared exists at the facility? ☒ Yes ☐ No

b. Did the Odour Screening Report indicate that a circumstance which requires an Odour Control Report (OCR) to be prepared exists at the facility? ☒ Yes ☐ No

b. i. If yes, please provide the Name(s) and Licence Number(s) of the Licensed Engineering Practitioner(s) that signed and sealed the Odour Control Report and the date signed and sealed.

First Name	Last Name	Licence Number(s)	Date Signed
Andrew	Lane-Smith	90281981	2020-12-07

c. Has a BMPP for odour been prepared as a result of a written notice from the Director issued under O. Reg. 1/17? ☐ Yes ☒ No

d. Please provide the Name(s) and Licence Number(s) of the Licensed Engineering Practitioner(s) that signed and sealed the BMPP for odour and the date signed and sealed.

First Name	Last Name	Licence Number(s)	Date Signed
Andrew	Lane-Smith	90281981	2020-12-07

Appendix D

Denso Manufacturing Canada: FOI Request and Emission Summary Table



Seebach, Stephanie <sseebach@dillon.ca>

RE: Information request for 280 Clair Rd W studies

1 message

Darryl Robinson <darryl.robinson@na.denso.com>

Tue, Jul 9, 2024 at 4:01 PM

To: "Seebach, Stephanie" <sseebach@dillon.ca>

Cc: John Farley <jdfarley@gmail.com>, John Klassen <john.klassen@na.denso.com>

Good morning Stephanie,

Thank you for your patience. Attached is the information you requested regarding an inquiry into our current air and noise compliance documents to inform your Noise Impact Study and Air Quality Study for [280 Clair Rd W](#).

This will be the only information I am able to share with you. Hope this helps

Regards

Darryl Robinson, P.Eng

Senior Manager / Quality Engineering

[900 Southgate Dr](#) / [Guelph, Ontario](#) / [N1L1K1](#)Email darryl.robinson@na.denso.com

From: Seebach, Stephanie <sseebach@dillon.ca>**Sent:** Thursday, July 4, 2024 1:45 PM**To:** Darryl Robinson <darryl.robinson@na.denso.com>**Cc:** John Farley <jdfarley@gmail.com>; John Klassen <john.klassen@na.denso.com>**Subject:** Re: Information request for [280 Clair Rd W](#) studies

Hi Darryl,

I hope you are enjoying your summer so far! Per our meeting on June 19, Dillon Consulting is requesting copies of the information summarized below to inform the Noise Impact Study and Air Quality Study for [280 Clair Rd W](#). We understand that this information is available however you require authorization to release the information to Dillon. Do you have any update you can please provide on our request? I know things must be very busy for you and your team but our deadline to complete the reports is approaching and without Denso's information, we would be required to initiate a Freedom of Information request to the Ministry of Environment to request the documents.

Summary of information request:

- Most recent Environmental Compliance Approval (we have a copy of the version dated April 11, 2017)
- Emission and Summary Dispersion Modelling Report that supports the ECA
- Acoustic Assessment Report that supports the ECA
- Description of expansion plans with respect to air and noise emissions sources (e.g., plans for a building expansion with certain # of rooftop HVAC units, doubling production capacity with additional thermal oxidizer)
- Confirmation on the source of the fill that is located on the severed property between [900 Southgate Dr](#) and [280 Clair Rd W](#). Can you please confirm if this is topsoil that was stripped from [900 Southgate Dr](#)? Was the fill certified before the severance was completed?

I really appreciate your assistance with this matter.

Thank you,

Stephanie



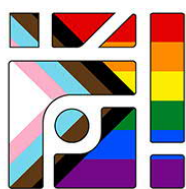
Stephanie Seebach
Associate
Dillon Consulting Limited
111 Farquhar Street, Suite 301
Guelph, Ontario, N1H 3N4
T - 519.571.9833 ext. 3158
M - 519.525.3898
sseebach@dillon.ca
www.dillon.ca

On Thu, Jun 27, 2024 at 11:25 AM Seebach, Stephanie <sseebach@dillon.ca> wrote:

Hi Darryl,

I wanted to follow up on the information request I sent below. Thank you again for your help with this and please let us know if you have any questions.

Stephanie



Stephanie Seebach
Associate
Dillon Consulting Limited
111 Farquhar Street, Suite 301
Guelph, Ontario, N1H 3N4
T - 519.571.9833 ext. 3158
M - 519.525.3898
sseebach@dillon.ca
www.dillon.ca

Inclusiveness: Enabling belonging to draw strength from our differences.

On Wed, Jun 19, 2024 at 4:41 PM Seebach, Stephanie <sseebach@dillon.ca> wrote:

Hi Darryl,

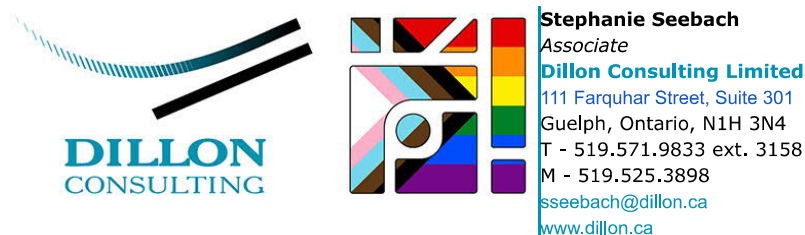
Thank you for taking the time to meet with John and I this afternoon. As discussed, Dillon is requesting the following information/copies of documents to inform the Noise Impact Study and Air Quality Study for [280 Clair Rd W](#):

- Most recent Environmental Compliance Approval
- Emission and Summary Dispersion Modelling Report that supports the updated ECA
- Acoustic Assessment Report that supports the updated ECA
- Description of expansion plans with respect to air and noise emissions sources (e.g., plans for a building expansion with certain # of rooftop HVAC units, doubling production capacity with additional thermal oxidizer)

Additionally, we are requesting confirmation on the source of the fill that is located on the severed property between [900 Southgate Dr](#) and [280 Clair Rd W](#). Can you please confirm if this is topsoil that was stripped from [900 Southgate Dr](#)? Was the fill certified before the severance was completed?

Thank you for your help and please let us know if you have any questions.

Stephanie



Inclusiveness: Enabling belonging to draw strength from our differences.

This message is directed in confidence solely to the person(s) named above and may contain privileged, confidential or private information which is not to be disclosed. If you are not the addressee or an authorized representative thereof, please contact the undersigned and then destroy this message.

Ce message est destiné uniquement aux personnes indiquées dans l'entête et peut contenir une information privilégiée, confidentielle ou privée et ne pouvant être divulguée. Si vous n'êtes pas le destinataire de ce message ou une personne autorisée à le recevoir, veuillez communiquer avec le soussigné et ensuite détruire ce message.

This communication and any attachments is meant only for the intended recipient(s) and may contain confidential and/or legally privileged information. If you are not an intended recipient, any review, use, dissemination, distribution or copying is strictly prohibited. Please notify us immediately by return e-mail and delete the message, including any duplicates, from your system. Thank you for your cooperation.

3 attachments



Approved ECA - Denso Manufacturing Canada, Inc. ECA No. 9696-AJFHC2.pdf

139K



2023 AAR Summary Table.pdf

88K



2023 ESDM Summary Table.pdf

144K



October 9, 2024

Mr. Thom Wright
Dillon Consulting Limited
425 Adelaide Street West, Unit 300
Toronto, Ontario M5V 3C1
twright@dillon.ca

Dear Thom Wright:

RE: MECP FOI A-2024-05357 – Decision Letter

This letter is further to your request made pursuant to the Freedom of Information and Protection of Privacy Act (the Act) relating to:

900 Southgate Drive, Guelph
Timeframe: January 1st, 2016 to August 15th, 2024 as clarified on September 11th

After a thorough search through the ministry files, records were located in response to your request. The final decision has been made to provide partial access to the requested information. The official responsible for making the access decision on your request is the undersigned.

Some of the information has been severed or withheld under the following sections of the Act:

s.17(1)(a) Corporate information supplied to the ministry in confidence for the protection of third-party records that, if disclosed, would prejudice significantly the competitive position or interfere significantly with the contractual or other negotiations of a person, group of persons or organization.

As noted in my letter of September 16, 2024, the responsive records contain information relating to a third party under section 17 of the Act. Records will be released to you once the affected third party's opportunity to appeal the ministry's decision is complete by November 15, 2024, in accordance with subsection 28(8) of the Act. If the third-party files an appeal, then the unaffected records will be released to you.

Section 57 of the Act authorizes certain fees to be charged for processing a request. Our charges for processing this request are:

Search Time 2 hours @ \$30/hour	\$60.00
o Time taken to locate and retrieve records	
Deposit	- \$5.00
Total	\$ 55.00

In order to receive a copy of the records please forward this amount in Canadian dollars to our office. Payment(s) may be made by **November 8, 2024**. If payment has not been received by this date, the file will be closed and you will be required to submit a new request.

Payment(s) may be made in Canadian dollars by one of the following options:

- Pay online through the Freedom of Information Request for Property Information Form: <https://forms.mgcs.gov.on.ca/en/dataset/012-2146>. Both the pdf download or "HTML" versions provide access to the payment option.
- Mail money order or cheque made payable to the "Minister of Finance (FOI)" or provide credit card information through the mail-in version of the form mentioned above.

Please **do not** mail cash or send your payment information via email.

You may request a review of my decision within 30 days from the date of this letter by contacting the Information and Privacy Commissioner/Ontario at <http://www.ipc.on.ca>. Please note there may be a fee associated with submitting the appeal. You will be given another 30-day opportunity to request a review of my decision at the time the records are released to you.

If you decide to pursue this request after the deadline has passed, please contact the analyst below to discuss options that are available.

If you have any questions, please contact Stephanie Rampino at 437-995-3228 or stephanie.rampino@ontario.ca.

Yours truly,



for
Josephine DeSouza
Manager, Access and Privacy Office



August 13, 2024

Thorn Wright
Dillon Consulting Limited
425 Adelaide Street West, Unit 300
Toronto, Ontario M5V 3C1
twright@dillon.ca

Dear Thorn Wright:

RE: MECP FOI A-2024-04659 – Decision Letter

This letter is further to your request made pursuant to the Freedom of Information and Protection of Privacy Act (the Act) relating to:

900 Southgate Drive, Guelph

After a thorough search through the ministry files, records were located in response to your request. The final decision has been made to provide partial access to the requested information. The official responsible for making the access decision on your request is the undersigned.

Some of the information has been severed or withheld under the following sections of the Act:

s.22(a) Records that are publicly available as follows:

- For corporate ownership (ONBIS records, Articles of Incorporation, Articles of Amendment) download forms ON00242E and 5310E to search for a public record available from Service Ontario at <https://www.ontario.ca/page/ontario-business-registry-all-services>. Go to "33. Searching the Public Record" to locate the forms.

Records or information that are not relevant to the request (e.g., records that are blank, outside of the date range or do not relate directly to the subject matter) have been removed and marked "Not Responsive" or 'N/R'.

Section 57 of the Act authorizes certain fees to be charged for processing a request. Our charges for processing this request are:

Search Time 1.33 hours @ \$30/hour	\$40.00
o Time taken to locate and retrieve records	

Total	\$ 40.00
--------------	-----------------

In order to receive a copy of the records please forward this amount in Canadian dollars to our office. Payment(s) may be made by **September 12, 2024**. If payment has not been received by this date, the file will be closed and you will be required to submit a new request.

The ministry's Environmental Assessment and Permissions Division (EAPD) has advised that there are inactive records in the Records Centre, Mississauga, and below is a description of these records:

ECA#, Media type, ECA status, Year

- 9696-AJFHC2, Air & Noise, Approved, 2017
- 1689-83CLJB, Air & Noise, Approved, 2015
- 0527-937JGR, Air & Noise, Approved, 2014
- 1689-83CLJB, Air & Noise, Approved, 2011

If you would like us to retrieve these files, please submit a separate request quoting this file number and state you are seeking records from the Record Centre. The \$5 application fee will be applied towards any costs incurred with the retrieval of the records from the Records Centre.

Payment(s) may be made in Canadian dollars by one of the following options:

- Pay online through the Freedom of Information Request for Property Information Form: <https://forms.mgcs.gov.on.ca/en/dataset/012-2146>. Both the pdf download or "HTML" versions provide access to the payment option.
- Mail money order or cheque made payable to the "Minister of Finance (FOI)" or provide credit card information through the mail-in version of the form mentioned above.

Please **do not** mail cash or send your payment information via email.

You may request a review of my decision within 30 days from the date of this letter by contacting the Information and Privacy Commissioner/Ontario at <http://www.ipc.on.ca>. Please note there may be a fee associated with submitting the appeal.

If you decide to pursue this request after the deadline has passed, please contact the analyst below to discuss options that are available.

If you have any questions, please contact Stephanie Rampino at 437-995-3228 or stephanie.rampino@ontario.ca.

Yours truly,



for
Josephine DeSouza

Manager, Access and Privacy Office

APPENDIX C
Current Emission Summary Table
(1 Page)

Table A3. Emission Summary Table

Contaminant	CAS #	Total Facility Emission Rate (g/s)	Air Dispersion Model Used*	Maximum POI Concentration (µg/m ³)	Averaging Period (h)	MECP POI Limit (µg/m ³)	Limiting Effect	Reg. Sch. No.	% of MECP POI Limit
Nitrogen oxides	10102-44-0	8.77E-02	AERMOD	7.24E+00	24	200	Health	3	4%
			AERMOD	1.83E+01	1	400	Health	3	5%
Distillates (petroleum), hydrotreated light	64742-47-8	4.87E-01	AERMOD	9.52E+01	24	375	Health	MD	25%
Soybean oil, methyl esters	67784-80-9	2.37E-02	AERMOD	4.89E+00	24	80	Health	JSL	6%
Ethyl cyanoacrylate	7085-85-0	1.98E-03	AERMOD	4.26E-01	24	5	Health	JSL	9%
Alcohols C12-13	75782-86-4	2.34E-02	AERMOD	4.87E+00	24	155	Health	JSL	3%
Fluorides (as HF) - Total Growing Season	7664-39-3	9.62E-04	AERMOD	5.75E-02	24	1.72	Vegetation	3	3%
			AERMOD	1.01E-02	30-day	0.69	Vegetation	3	1%
			AERMOD	4.11E-02	24	3.44	Vegetation	3	1.2%
Fluorides (as HF) - Total Non-Growing Season			AERMOD	7.23E-03	30-day	1.38	Vegetation	3	0.5%
			AERMOD	5.75E-02	24	0.86	Vegetation	3	6.7%
			AERMOD	1.01E-02	30-day	0.34	Vegetation	3	3.0%
Particulate matter	n/a	2.13E-03	AERMOD	3.69E-01	24	120	Visibility	3	0.31%

*AERMOD v. 22112.

Air Contaminants Benchmarks (ACB) List, Version 3.0, April 2023

Reg. Sch. or Benchmark 1: 3 Standard - Schedule 3 of Reg. 419

Benchmark 2: JSL Jurisdictional Screening Level

MD Ministry Derived Screening Level

Appendix E

The TDL Group Corp. ESDM Report Materials

TABLE 1 SOURCE and CONTAMINANT IDENTIFICATION TABLE
The TDL Group Corp - Guelph Distribution Warehouse

Source Number	Tag	Description	Location	Expected Contaminants	Significant	Rationale	Natural Gas Input (BTU/HR)	Stack Height (Above Roof) [m]	Roof Height [m]	Unit Input [GJ/hr]	Building Total [GJ/hr]
1	HV1	Rooftop HVAC Unit S. Maintenance	Rooftop	Products of Combustion	No	Listed in Table B3 of 3614e02 Document	78,000	0.5	10.6	0.08	5.04
2	HV2	Rooftop HVAC Unit Main Office	Rooftop	Products of Combustion	No	Listed in Table B3 of 3614e02 Document	240,000	0.5	10.6	0.25	
3	HV3	Rooftop HVAC Unit Main Office	Rooftop	Products of Combustion	No	Listed in Table B3 of 3614e02 Document	240,000	0.5	10.6	0.25	
4	HV4	Rooftop HVAC Unit Warehouse	Rooftop	Products of Combustion	No	Listed in Table B3 of 3614e02 Document	260,000	0.5	13.7	0.27	
5	HV5	Rooftop HVAC Unit Warehouse	Rooftop	Products of Combustion	No	Listed in Table B3 of 3614e02 Document	480,000	0.5	13.7	0.51	
6	HV6	Rooftop HVAC Unit Main Office	Rooftop	Products of Combustion	No	Listed in Table B3 of 3614e02 Document	480,000	0.5	13.7	0.51	
7	HV7	Rooftop HVAC Unit Main Office	Rooftop	Products of Combustion	No	Listed in Table B3 of 3614e02 Document	480,000	0.5	10.6	0.51	
8	HV8	Rooftop HVAC Unit Main Office	Rooftop	Products of Combustion	No	Listed in Table B3 of 3614e02 Document	480,000	0.5	10.6	0.51	
9	HV9	Rooftop HVAC Unit Main Office	Rooftop	Products of Combustion	No	Listed in Table B3 of 3614e02 Document	480,000	0.5	10.6	0.51	
10	UH1	Unit Heater pump room	Rooftop	Products of Combustion	No	Listed in Table B3 of 3614e02 Document	45,000	0.5	10.6	0.05	
11	UH2	Unit Heater north corridor	Rooftop	Products of Combustion	No	Listed in Table B3 of 3614e02 Document	60,000	0.5	10.6	0.06	
12	UH3	Unit Heater rooms 140.142.125	Rooftop	Products of Combustion	No	Listed in Table B3 of 3614e02 Document	100,000	0.5	10.6	0.11	
13	UH4	Unit Heater electrical room	Rooftop	Products of Combustion	No	Listed in Table B3 of 3614e02 Document	125,000	0.5	10.6	0.13	
14	UH5	Unit Heater trash room	Rooftop	Products of Combustion	No	Listed in Table B3 of 3614e02 Document	200,000	0.5	10.6	0.21	
15	IR1	Infrared Heater Shipping Receiving	Rooftop	Products of Combustion	No	Listed in Table B3 of 3614e02 Document	150,000	0.5	10.6	0.16	
16	IR2	Infrared Heater Shipping Receiving	Rooftop	Products of Combustion	No	Listed in Table B3 of 3614e02 Document	175,000	0.5	10.6	0.18	
17	HWH1	Domestic water heater	Rooftop	Products of Combustion	No	Listed in Table B3 of 3614e02 Document	235,000	0.5	10.6	0.25	
18	HWH2	Domestic water heater	Rooftop	Products of Combustion	No	Listed in Table B3 of 3614e02 Document	235,000	0.5	10.6	0.25	
19	HWH3	Domestic water heater	Rooftop	Products of Combustion	No	Listed in Table B3 of 3614e02 Document	235,000	0.5	10.6	0.25	
20	G1750	1750DQKB Cummins Generator	South End of Bldg.	Products of Combustion	Yes	Generator for use under DR3 equipped with APC system		below roof			
21	G900	900DFHC Cummins Generator	NE End of Bldg.	Products of Combustion	Yes	Generator for use under DR3 equipped with APC system		below roof			

TABLE 2 SOURCE SUMMARY TABLE
The TDL Group Corp - Guelph Distribution Warehouse

Stack Parameters										Emission Data				
Source ID	Source Description	Volumetric Flow Rate	Exit Temperature	Inner Diameter	Ht. Above Grade	Ht. Above Roof	Source Coordinates (see note 1)		Velocity	Maximum Rate NOx CAS # 10102-44-0	Averaging Period	Emission Estimating Technique	Data Quality	% of Overall Emissions
		[am3/s]	[C]	[m]	[m]	[m]			[m/s]	[g/s]	[minutes]			
1	HV1	0.015	149	0.150	11.1	0.5			0.9	0.001	30	EF	Average	0.26
2	HV2	0.047	149	0.150	11.1	0.5			2.6	0.003	30	EF	Average	0.80
3	HV3	0.047	149	0.150	11.1	0.5			2.6	0.003	30	EF	Average	0.80
4	HV4	0.051	149	0.150	14.2	0.5			2.9	0.003	30	EF	Average	0.87
5	HV5	0.094	149	0.150	14.2	0.5			5.3	0.006	30	EF	Average	1.61
6	HV6	0.094	149	0.150	14.2	0.5			5.3	0.006	30	EF	Average	1.61
7	HV7	0.094	149	0.150	11.1	0.5			5.3	0.006	30	EF	Average	1.61
8	HV8	0.094	149	0.150	11.1	0.5			5.3	0.006	30	EF	Average	1.61
9	HV9	0.094	149	0.150	11.1	0.5			5.3	0.006	30	EF	Average	1.61
10	UH1	0.009	149	0.150	11.1	0.5			0.5	0.001	30	EF	Average	0.15
11	UH2	0.012	149	0.150	11.1	0.5			0.7	0.001	30	EF	Average	0.20
12	UH3	0.019	149	0.150	11.1	0.5			1.1	0.001	30	EF	Average	0.33
13	UH4	0.024	149	0.150	11.1	0.5			1.4	0.001	30	EF	Average	0.42
14	UH5	0.039	149	0.150	11.1	0.5			2.2	0.002	30	EF	Average	0.67
15	IR1	0.029	149	0.150	11.1	0.5			1.7	0.002	30	EF	Average	0.50
16	IR2	0.034	149	0.150	11.1	0.5			1.9	0.002	30	EF	Average	0.59
17	HWH1	0.046	149	0.150	11.1	0.5			2.6	0.003	30	EF	Average	0.79
18	HWH2	0.046	149	0.150	11.1	0.5			2.6	0.003	30	EF	Average	0.79
19	HWH3	0.046	149	0.150	11.1	0.5			2.6	0.003	30	EF	Average	0.79
20	G1750	6.100	460	0.420	NA	NA			44.0	0.194	30	EF	Average	55.48
21	G900	3.275	481	0.310	NA	NA			43.4	0.100	30	EF	Average	28.53
Total										0.350				100.00

Note 1 All stacks included in virtual source configuration

Appendix F

Sleeman Breweries Ltd.: FOI Request and Emission Summary Table



Seebach, Stephanie <sseebach@dillon.ca>

Re: Request for meeting: Land Use Compatibility Assessment for 280 Clair Rd W

1 message

Seebach, Stephanie <sseebach@dillon.ca>

Wed, Apr 10, 2024 at 1:22 PM

To: michelle.watson@sleemanbreweries.ca

Cc: Lucas Arnold <larnold@dillon.ca>

Hi Michelle,

I am following up on the email I sent last month regarding Dillon's request to meet with you to discuss Sleeman's current and planned operations with respect to air and noise emissions. If there is someone else I should be reaching out to regarding this matter, can you please let me know?

As a recap, I work for Dillon Consulting Ltd. and we have been retained by Home Opportunities to complete a Detailed Noise Study and Air Quality Impact Study as required as part of the planning application for the proposed residential development at 280 Clair Rd W. The studies serve to protect existing industries from potential impacts from new sensitive land uses.

To complete the most accurate Noise and Air Quality Studies, information on Sleeman's current and future operations with respect to air and noise emission sources is required.

Would you be open to meeting with me and my colleague Lucas Arnold to discuss our information request further and address any questions you may have about the studies we are completing?

Thank you,
Stephanie

**Stephanie Seebach**

Associate

Dillon Consulting Limited

111 Farquhar Street, Suite 301

Guelph, Ontario, N1H 3N4

T - 519.571.9833 ext. 3158

F - 519.571.7424

M - 519.525.3898

sseebach@dillon.ca

www.dillon.ca



On Thu, Mar 7, 2024 at 1:00 PM Seebach, Stephanie <sseebach@dillon.ca> wrote:

Hi Michelle,

I received your contact information from Beverly. Dillon Consulting Ltd. has been retained by Home Opportunities to complete a Detailed Noise Study and Air Quality Impact Study as required as part of the planning application for the proposed residential development at 280 Clair Rd W.

The purpose of the Noise and Air Quality Studies is to evaluate compatibility between the surrounding industries and the proposed development, with respect to air contaminants, odour, dust, noise and vibration. The studies serve to protect existing industries from potential impacts from new sensitive land uses.

Since the Sleeman Brewery is located within the 1000m study area, Dillon requires information on Sleeman's current and planned operations as part of the Noise and Air Quality Studies.

We would appreciate an opportunity to meet with you by phone or virtual meeting to further review the land use compatibility assessment process and discuss current operations and any future expansion plans. Can you please let us know if you are open to further discussion and if so, your availability to meet?

Thank you,



Seebach, Stephanie <sseebach@dillon.ca>

Re: MECP FOI A-2024-04892 – Decision Letter

1 message

Wright, Thom <twright@dillon.ca>

Mon, Aug 19, 2024 at 9:33 AM

To: "Chambers, Roxanne (MECP)" <Roxanne.Chambers@ontario.ca>

Cc: Stephanie Seebach <sseebach@dillon.ca>

Hi Roxanne,

Thank you for getting back to me. I did a quick search on AccessEnvironment and found that the Sleeman facility at [551 Clair Road West](#) also has a registered Air and Noise EASR (**R-010-9112817681**), dated January 7th, 2021. As we are looking for the most recent versions of the facility's ESDM/AAR/Odour and Dust BMPP, the materials associated with this EASR would be most applicable for us. Would the Records Centre also retain EASR registrations and their associated Air/Noise materials?

All the best,

On Sun, Aug 18, 2024 at 3:08 PM Chambers, Roxanne (MECP) <[Roxanne.Chambers@ontario.ca](#)> wrote:

Good Afternoon Thom,

Please find attached the Ministry's decision letter. There are no records related to the above request. If you have any questions, please e-mail me.

Sincerely,

Roxanne Chambers | Freedom of Information Analyst

Ministry of the Environment, Conservation and Parks | Operational Services, Access and Privacy

[40 St Clair Avenue W, Toronto, Ontario, M4T 1M9](#) | P: 807-456-3035roxanne.chambers@ontario.caWebsite: www.ontario.ca/environment



Seebach, Stephanie <sseebach@dillon.ca>

Fwd: MECP FOI A-2024-04892 - Additional Records

1 message

Wright, Thom <twright@dillon.ca>
To: Stephanie Seebach <sseebach@dillon.ca>

Tue, Oct 8, 2024 at 3:35 PM

Hi Steph,

Decision email on Sleeman FOI attached:

----- Forwarded message -----

From: **Shah, Amina (MECP)** <Amina.Shah@ontario.ca>
Date: Tue, Sep 17, 2024 at 11:59 AM
Subject: MECP FOI A-2024-04892 - Additional Records
To: twright@dillon.ca <twright@dillon.ca>

Good morning Thom,

Upon a further search, it has been confirmed that the records you are requesting are not available within the timeframe you have requested. The last submission of these documents would have likely been submitted to us during an ECA application, which is in 2012. Please submit a new request with a revised timeframe as some of those items you're looking for may be available.

As of right now the decision to provide no records of August 18th sent by Roxanne Chambers still stands.

Thank you kindly,

Amina Shah

Freedom of Information Analyst, Access and Privacy Office

Emergency Management and Access Branch

Ministry of the Environment, Conservation and Parks

Email: Amina.shah@ontario.ca Mobile: 437-339-1251

Thom Wright
Dillon Consulting Limited
425 Adelaide St W, Suite 300
Toronto, Ontario, M5V 3C1
T - 416.229.4647 ext. 2047
twright@dillon.ca
www.dillon.ca



August 18, 2024

Mr. Thom Wright
Dillon Consulting Limited
425 Adelaide Street West, Unit 300
Toronto, Ontario M5V 3C1
twright@dillon.ca

Dear Thom Wright:

RE: **MECP FOI A-2024-04892 – Decision Letter**

This letter is in response to your request made pursuant to the Freedom of Information and Protection of Privacy Act (the Act) relating to:

551 Clair Road West, Guelph
Timeframe: January 1, 2014 to July 25, 2024

After a thorough search through the ministry files, no records were located responsive to your request. The official responsible for making the access decision on your request is the undersigned.

The ministry's District Office has advised that there are inactive records in the Records Centre, Mississauga, and below is a description of these records:

- ECA 1390-8TJN9Z, Air, Sleeman Breweries Ltd./ Brasserie Sleeman Ltee, Approved, Offsite, 1409, 2012
- ECA 8168-A3AQLE, Industrial, Sleeman Breweries Ltd./ Brasserie Sleeman Ltee, Approved, Offsite, 0030, 2015
- ECA 1220-8HLLRQ, Industrial, Sleeman Breweries Ltd./ Brasserie Sleeman Ltee, Revoked and/or Replaced, Offsite, 0030, 2015
- ECA 0000-874K62, Industrial, Sleeman Breweries Ltd./ Brasserie Sleeman Ltee, Revoked and/or Replaced, Offsite, 0030, 2015

If you would like us to retrieve these files, please submit a separate request quoting this file number. The \$5 application fee will be applied towards any costs incurred with the retrieval of the records from the Records Centre.

You may request a review of my decision within 30 days from the date of this letter by contacting the Information and Privacy Commissioner/Ontario at <http://www.ipc.on.ca>.

Please note there may be a fee associated with submitting the appeal.

If you have any questions, please contact Roxanne Chambers at (807) 456-3035 or roxanne.chambers@ontario.ca.

Yours truly,

Roxanne Chambers

for

Josephine DeSouza

Manager, Access and Privacy Office

Sleeman Breweries Ltd.
Emission Summary Table (2021)
Obtained from MECP's online database (Access Environment)

CAS Registry Number	Total Facility Emission Rate (g/s)	Air Dispersion Model Used	Maximum POI Concentration	Averaging Period	Ministry POI Limit	Limiting Effect	19 or 20 of O. Reg.	Schedule	% of Ministry POI Limit	Source	Benchmark	Unit for POI Values	Notes	Name of Contaminant	Version Date of ACB List
0.0742014		SCREEN3	56.369	24-hour	120	Visibility	s. 20	Sch. 3	0.469742	Standard	B1	ug/m3			
0.000027		SCREEN3	0.17	10-minute	13	Odour	s. 20	Sch. 3	0.013077	Standard	B1	ug/m3	ACB List (Notes 3, 13, 14, 15)	Mercaptans	2
10102-44-0.696508		SCREEN3	91.913267	24-hour	200	Health	s. 20	Sch. 3	0.459566	Standard	B1	ug/m3	ACB List (Notes 2, 17)		2
630-08-0 0.890854		SCREEN3	256.309	1/2-hour	6000	Health	s. 20	Sch. 3	0.042718	Standard	B1	ug/m3	ACB List (Note 9)		2
7446-09-5 0.025363		SCREEN3	0.787315	24-hour	275	Health & Vegetation	s. 20	Sch. 3	0.002863	Standard	B1	ug/m3	ACB List (Effective until July 1, 2023, Note 2, URT - Note 4, Table 4)		2
7440-47-3 0.000000144		SCREEN3	0.0000239	Annual	0.00014	Health	s. 20	Sch. 3	0.170714	Standard	B1	ug/m3	ACB List (Notes 11, 19, Table 2, 3, URT - Note 4, Table 4)	Chromium	2
7440-48-4 0.000000003		SCREEN3	0.0000023	24-hour	0.1	Health	s. 20		0.000023	Guideline	B1	ug/m3			2
7439-96-5 0.0000017		SCREEN3	0.001508	24-hour	0.4	Health	s. 20	Sch. 3	0.00377	Standard	B1	ug/m3	ACB List (URT - Note 4, Table 4)		2
7440-02-0 0.000000016		SCREEN3	0.000003	Annual	0.04	Health	s. 20	Sch. 3	0.000075	Standard	B1	ug/m3	ACB List (Note 19, Table 2, 3, URT - Note 4, Table 4)		2
1309-37-1 0.0000314		SCREEN3	0.027212	24-hour	25	Solling	s. 20	Sch. 3	0.001088	Standard	B1	ug/m3			2
1310-73-2 0.002203		SCREEN3	0.6496	24-hour	10	Corrosion	s. 20		0.06496	Guideline	B1	ug/m3			2
532-32-1 0.000095		SCREEN3	0.0153	24-hour	15	Health & Particulate	s. 20		0.00102	SL-JSL	B2	ug/m3			2
51580-86-0.000158		SCREEN3	0.02551	24-hour	15	Health & Particulate	s. 20		0.001701	SL-JSL	B2	ug/m3			2
7647-14-5 0.0000016		SCREEN3	0.0003	24-hour	15	Health & Particulate	s. 20		0.00002	SL-JSL	B2	ug/m3			2
151006-66.0.00057		SCREEN3	0.093	24-hour			s. 20							Acrylic acid terpolymer, sodium salt	
78620-7-2 0.00057		SCREEN3	0.093095	24-hour			s. 20							Hydroxyphosphono acetic acid, sodium salt	
3794-83-0 0.00025		SCREEN3	0.040301	24-hour			s. 20							Phosphonic acid, (1-hydroxyethylidene) bis-, tetrasodium salt	
64665-57-0.000135		SCREEN3	0.022	24-hour	2.5	Health	s. 20		0.0088	SL-JSL	B2	ug/m3			2
40372-66-0.000135		SCREEN3	0.021763	24-hour			s. 20							2-Phosphonobutane-1,2,4-tricarboxylic acid, sodium salt	
64-17-5 0.2098		SCREEN3	618.071	1-hour	19000	Odour	s. 20		0.03253	Guideline	B1	ug/m3	ACB List (To be updated - Note 5)	Ethanol (Ethyl alcohol)	2
18540-29-0.000000956		SCREEN3	0.000828	24-hour	0.5	Health	s. 20	Sch. 3	0.001656	Standard	B1	ug/m3	ACB List (Note 11a, URT - Note 4, Table 4)		2
10102-44-0.696508		SCREEN3	223.79	1-hour	400	Health	s. 20	Sch. 3	0.559475	Standard	B1	ug/m3	ACB List (Notes 2, 17)		2
7446-09-5 0.025363		SCREEN3	1.92	1-hour	690	Health & Vegetation	s. 20	Sch. 3	0.002783	Standard	B1	ug/m3	ACB List (Effective until July 1, 2023, Note 2, URT - Note 4, Table 4)		2

References

Environmental Protection Act, Ontario, 1990.

Environmental Land Use Planning Guides, Ministry of the Environment, Conservation and Parks, 2016.

Ontario Regulation 1/17: Registrations under Part II.2 of the Act – Activities Requiring Assessment of Air Emissions, Ministry of the Environment, Conservation and Parks, 2017.

Ontario Regulation 419/05: Air Pollution – Local Air Quality, Ministry of the Environment, Conservation and Parks, 2019.

Provincial Policy Statement, Ministry of Municipal Affairs and Housing, 2020.