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Ministry of the Environment and Climate Change  
Ministère de l'Environnement et de l'Action en matière de changement  
climatique

### AMENDED ENVIRONMENTAL COMPLIANCE APPROVAL

NUMBER 2592-AQPSJ2

Issue Date: September 20, 2017

Union Gas Limited  
50 Keil Drive North  
P.O. Box 2001  
Chatham-Kent, Ontario  
N7M 5M1

Site Location: All Sites Across the Province of Ontario

*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 natural gas utility that employs a network of interconnecting natural gas conveyance and storage systems to provide energy delivery and related services to distribution service areas in Ontario, consisting of the following processes and support units:

- natural gas fired turbine compressors;
- natural gas fired reciprocating internal combustion engine (RICE) compressors;
- four (4) existing natural gas fired microturbines having a maximum capacity of 16.25 kilowatts each;
- existing fume incinerators;
- natural gas fired combustion equipment including boilers, dehydrator reboilers, humidifiers; and
- maintenance welding operations;

including the *Equipment* and any other ancillary and support processes and activities, operating at a *Facility Production Limit* of up to a total combined annual throughput of 46,000,000,000 cubic metres of natural gas discharging to the air as described in the *Original ESDM Report and Assessment Protocol*.

*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*, 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 5 of this *Approval*. The Acoustic assessment Reports are listed in Schedule "A";
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 5 of this *Approval*;
5. "*Acoustic Audit*" means an investigative procedure consisting of measurements and/or acoustic modelling of all sources of noise emissions due to the operation of the *Facility*, assessed to determine compliance with the applicable limits for the *Facility* regarding noise emissions, completed in accordance with the procedures set in *Publication NPC-103* and reported in accordance with *Publication NPC-233*;
6. "*Acoustic Audit Report*" means a report presenting the results of an *Acoustic Audit*, prepared in accordance with *Publication NPC-233*;
7. "*Acoustical Consultant*" means a person currently active in the field of environmental acoustics and noise/vibration control, who is familiar with *Ministry* noise guidelines and procedures and has a combination of formal university education, training and experience necessary to assess noise emissions from a *Facility*;
8. "*Air Standards Manager*" means the Manager, Human Toxicology and Air Standards Section, Standards Development Branch, or any other person who represents and carries out the duties of the Manager, Human Toxicology and Air Standards Section, Standards Development Branch, as those duties relate to the conditions of this *Approval*;
9. "*Approval*" means this entire Environmental Compliance Approval and any *Schedules* to it;
10. "*Assessment Protocol*" means a document describing methodologies for assessing the compliance of the emissions of a *Compound of Concern* from sources generally present at a certain type of *Site* with the *Performance Limits*; and which may include screening criteria precluding the requirement to prepare an *ESDM Report* or *Acoustic Assessment Report* for certain sites which meet those criteria, and which is included in Schedule "A";
11. "*Assessment Report*" means a document demonstrating that a *Site* meets the screening criteria described in an *Assessment Protocol* and is deemed to be in compliance with the *Performance Limits* for air and/or noise emissions and does not need to have an associated *ESDM Report* and/or *Acoustic Assessment Report*;
12. "*Basic Comprehensive User Guide*" means the *Ministry* document titled "Basic Comprehensive Certificates of Approval (Air) User Guide" dated March 2011, as amended;
13. "*Building*" means a building associated with a service centre, or that incorporates natural gas fired comfort heating, domestic hot water equipment, or maintenance welding operations, but does not include buildings associated with a *Compressor Station* or *Gate Station*;
14. "*Company*" means Union Gas Limited 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*;
15. "*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;
16. "Compressor Station" means any *Site* that contains equipment for compressing natural gas;
  17. "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*;
  18. "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*;
  19. "District Manager" means the District Manager of the appropriate local district office of the *Ministry*, where the *Facility* is geographically located;
  20. "Emission Abatement Plan" means an abatement program developed by the *Company* to achieve compliance with the *Performance Limits*;
  21. "Emission Summary Table" means a table described in paragraph 14 of subsection 26 (1) of *O. Reg. 419/05*;
  22. "Environmental Assessment Act" means the Environmental Assessment Act, R.S.O. 1990, c.E.18, as amended;
  23. "EPA" means the Environmental Protection Act, R.S.O. 1990, c.E.19, as amended;
  24. "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;
  25. "Equipment with Specific Operational Limits" means all natural gas fired turbine compressors, 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*;
  26. "ESDM Report" means the most current Emission Summary and Dispersion Modelling Report that describes the *Site*. The *ESDM Report* is based on the *Original ESDM Report* for a *Site*, in prepared after the issuance of this *Approval* in accordance with section 26 of *O. Reg. 419/05* and the *Procedure Document* by the *Company* or its consultant;
  27. "Facility" means the entire operation, including all *Sites*;
  28. "Facility Production Limit" means the production limit placed by the *Director* on the main product(s) or raw materials used by the *Facility*;
  29. "Gate Station" means a *Site* that functions as a metering and/or regulating station and that incorporates natural gas-fired heating equipment;
  30. "Independent Acoustical Consultant" means an *Acoustical Consultant* who is not representing the *Company* and was not involved in preparing the *Acoustic Assessment Report* or the design/implementation of *Noise Control Measures* for the *Facility* and/or *Equipment*. The *Independent Acoustical Consultant* shall not be retained by the *Acoustical Consultant* involved in the noise impact assessment or the design/implementation of *Noise Control Measures* for the *Facility* and/or *Equipment*;
  31. "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;
  32. "Manager" means the Manager, Technology Standards Section, Standards Development Branch, of the *Ministry*, or any other person who represents and carries out the duties of the Manager, Technology Standards Section, Standards Development Branch of the *Ministry*, as

- those duties relate to the conditions of this *Approval*;
33. "*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;
  34. "*Ministry*" means the ministry of the *Minister*;
  35. "*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*;
  36. "*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. It also means the noise control measures detailed in the *Acoustic Assessment Report*;
  37. "*O. Reg. 419/05*" means Ontario Regulation 419/05, Air Pollution – Local Air Quality, as amended;
  38. "*Original ESDM Report*" means the Emission Summary and Dispersion Modelling Reports which were prepared in accordance with section 26 of *O. Reg. 419/05* and the *Procedure Document* by ORTECH Consulting Inc. as described in Schedule A submitted in support of the application, and includes any changes to the report made up to the date of issuance of this *Approval*;
  39. "*Point of Impingement*" has the same meaning as in section 2 of *O. Reg. 419/05*;
  40. "*Point of Reception*" means Point of Reception as defined by *Publication NPC-205* and/or *Publication NPC-232*, as applicable;
  41. "*Pre-Test Information*" means the information outlined in Section 1 of the *Source Testing Code*;
  42. "*Principal EHS Technical Advisor*" means the Principal EHS Technical Advisor, Union Gas Limited or any other person who represents and carries out the duties of the Principal EHS Technical Advisor, Union Gas Limited, as those duties relate to the conditions of this *Approval*;
  43. "*Procedure Document*" means *Ministry* guidance document titled "Procedure for Preparing an Emission Summary and Dispersion Modelling Report" dated February 2017, as amended;
  44. "*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*;
  45. "*Publication NPC-103*" means the *Ministry* Publication NPC-103, "Procedures" of the Model Municipal Noise Control Bylaw, Final Report, August 1978;
  46. "*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;
  47. "*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;
  48. "*Publication NPC-232*" means the *Ministry* Publication NPC-232, "Sound Level Limits for Stationary Sources in Class 3 Areas (Rural)", October, 1995, as amended;
  49. "*Publication NPC-233*" means the *Ministry* Publication NPC-233, "Information to be Submitted for Approval of Stationary Sources of Sound", October, 1995, as amended;
  50. "*Schedules*" means the following schedules attached to this *Approval* and forming part of this *Approval* namely:

- a. Schedule A - Supporting Documentation
  - b. Schedule B - List of Compressor/Storage Pool Stations
  - c. Schedule C - Emission Abatement Plan
  - d. Schedule D - Limits for New Turbine Compressor
  - e. Schedule E – Parameters for Turbine Compressors
  - f. Schedule F – Continuous Temperature Monitoring
  - g. Schedule G – Third Party Verification/Self-Assessment Program
51. “*Self-Assessment Program*” means a procedure consisting of inspection and/or observation carried out either by the *Company* or by a qualified *Third Party Consultant* to confirm the *Company* is operating in accordance with the provisions of this *Approval* and the air and noise emissions produced from a *Site* are in compliance with the conditions of this *Approval*;
  52. “*Site*” means a property that is owned or leased by the *Company*, including a property that becomes owned or leased by the *Company* after the issue date on this *Approval* that is located in Ontario, and includes all *Equipment* owned or operated by the *Company* on that property;
  53. “*Source Testing*” means sampling and testing to measure emissions resulting from the *Facility* as required under terms and conditions in this *Approval* from the specified exhaust(s) under process conditions which represent a maximum operating range/rating at steady state within the approved operating range of the *Facility*, or the maximum achievable at the times of the testing;
  54. “*Source Testing Code*” means the Source Testing Code, Version 2, Report No. ARB-66-80, dated November 1980, prepared by the *Ministry* as amended;
  55. “*Storage Pool*” means a *Compressor Station* associated with the underground storage of natural gas;
  56. “*Test Contaminants*” means Nitrogen Oxides, Carbon Monoxide, and Sulphur Dioxide;
  57. “*Thermal Efficiency*” means the Thermal Efficiency of each turbine compressor described in Schedule “E” of this *Approval*;
  58. “*Third Party Consultant*” means a consultant who is not representing the *Company*, and who was not involved in preparing the *ESDM Report* or the *Acoustic Assessment Report* or in the design/implementation of the Emission Abatement Plan for the *Site*;
  59. “*Third Party Verification Program*” means a procedure consisting of inspection and/or observation carried out by a qualified *Third Party Consultant* to confirm the *Company* is operating in accordance with the provisions of this *Approval* and that the air and noise emissions produced from a *Site* are in compliance with the conditions of this *Approval*;
  60. “*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
  61. “*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

1. Except as otherwise provided by this *Approval*, the *Facility* shall be designed, developed, built, operated and maintained in accordance with the terms and conditions of this *Approval* and in accordance with the following *Schedules* attached hereto:
  - a. Schedule A - Supporting Documentation
  - b. Schedule B - List of Compressor/Storage Pool Stations
  - c. Schedule C - Emission Abatement Plan
  - d. Schedule D - Limits for New Turbine Compressor
  - e. Schedule E – Parameters for Turbine Compressors
  - f. Schedule F – Continuous Temperature Monitoring
  - g. Schedule G – Third Party Verification/Self-Assessment Program
2. The *Company* shall carry out the *Emission Abatement Plan* included in Schedule “C”.
3. The *Company* shall apply for an amendment and be in possession of an amended *Approval*, prior to operating a *Compressor Station* that is not included in Schedule "B".

## 2. LIMITED OPERATIONAL FLEXIBILITY

1. Pursuant to section 20.6 (1) of the *EPA* and subject to Conditions 2.2 and 2.3 of this *Approval*, future construction, alterations, extensions or replacements are approved in this *Approval* if the future construction, alterations, extensions or replacements are *Modifications* to the *Facility* that:
  - a. are within the scope of the operations of the *Facility* as described in the *Description Section* of this *Approval*;
  - b. do not result in an increase of the *Facility Production Limit* above the level specified in the *Description Section* of this *Approval*; and
  - c. result in compliance with the performance limits as specified in Condition 4.
2. Condition 2.1 does not apply to,
  - a. the addition of any new *Equipment with Specific Operational Limits* or to the *Modification* of any existing *Equipment with Specific Operational Limits* at the *Facility*; or
  - b. *Modifications* to the *Facility* that would be subject to the *Environmental Assessment Act*.
3. Condition 2.1 of this *Approval* shall expire ten (10) years from the date of this *Approval*, unless this *Approval* is revoked prior to the expiry date. The *Company* may apply for renewal of Condition 2.1 of this *Approval* by including an *ESDM Report* and an *Acoustic Assessment Report* that describes the *Facility* as of the date of the renewal application.

## 3. REQUIREMENT TO REQUEST AN ACCEPTABLE POINT OF IMPINGEMENT CONCENTRATION

1. Prior to making a *Modification* to the *Facility* that satisfies Condition 2.1.a. and 2.1.b., the *Company* shall prepare a proposed update to the *ESDM Report* to reflect the proposed *Modification*.
2. 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:
  - a. The *Compound of Concern* was not a *Compound of Concern* in the previous version of the *ESDM Report* and
    1. the concentration of the *Compound of Concern* exceeds the concentration set out for the contaminant in the *ACB list*; or
    2. the *Compound of Concern* is not identified in the *ACB list*; or
  - b. The concentration of the *Compound of Concern* in the updated *ESDM Report* exceeds the

higher of,

1. the most recent *Acceptable Point of Impingement Concentration*, and
  2. the concentration set out for the contaminant in the *ACB list*, if the contaminant is identified in that document.
3. The request required by Condition 3.2 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*.
  4. If the request required by Condition 3.2 is a result of a proposed *Modification* described in Condition 3.1, 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*.
  5. If a request is required to be made under Condition 3.2 in respect of a proposed *Modification* described in Condition 3.1, the *Company* shall not make the *Modification* mentioned in Condition 3.1 unless the request is approved in writing by the *Director*.
  6. If the *Director* notifies the *Company* in writing that the *Director* does not approve the request, the *Company* shall,
    - a. revise and resubmit the request; or
    - b. notify the *Director* that it will not be making the *Modification*.
  7. The re-submission mentioned in Condition 3.6 shall be deemed a new submission under Condition 3.2.
  8. If the *Director* approves the request, the *Company* shall update the *ESDM Report* to reflect the *Modification*.
  9. Condition 3 does not apply if Condition 2.1 has expired.

#### 4. PERFORMANCE LIMITS

1. Subject to Condition 4.2, the *Company* shall not discharge or cause or permit the discharge of a *Compound of Concern* into the air if,
  - a. the *Compound of Concern* is 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 Benchmark 1 concentration; or
  - b. 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,
    1. if an *Acceptable Point of Impingement Concentration* exists, the most recent *Acceptable Point of Impingement Concentration*, and
    2. the concentration set out for the contaminant in the *ACB list*, if the contaminant is identified in that document.
2. Condition 4.1 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.
3. In accordance with the provisions of *Schedule "C"*, the *Company* shall:
  - a. implement the *Noise Control Measures* as outlined in the *Acoustic Assessment Report*;
  - b. ensure, subsequent to the implementation of the *Noise Control Measures* that the noise emissions from the *Facility* comply with the limits set in *Ministry Publication NPC-205 or Publication NPC-232*, as applicable; and
  - c. ensure that the *Noise Control Measures* are properly maintained and continue to provide the acoustical performance outlined in the *Acoustic Assessment Report*.
4. The *Company* shall, at all times, ensure that the vibration emissions from the *Facility* comply

with the limits set out in *Ministry Publication NPC-207*.

5. The *Company* shall operate any *Equipment with Specific Operational Limits* approved by this *Approval* in accordance with the *Original ESDM Report* and Conditions 10, 12 and 13 in this *Approval*.
6. The *Company* shall ensure that each turbine compressor installed since March 1994, including Bright Compressor Station Unit C; Lobo Compressor Station Unit D; and Dawn Compressor Station Unit H, is designed and operated to comply, at all times, with the following performance requirements:
  - a. the concentrations of Nitrogen Oxides, Carbon Monoxide and Sulphur Dioxide in the undiluted flue gas leaving the turbine compressor (Bright Compressor Station Unit C; Lobo Compressor Station Unit D; and Dawn Compressor Station Unit H) exhaust stack is not greater than the limits specified in Schedule "D" of this *Approval*; and
  - b. the thermal efficiency of the turbine compressor (Bright Compressor Station Unit C; Lobo Compressor Station Unit D; and Dawn Compressor Station Unit H) is not less than the efficiency specified in Schedule "D" of this *Approval*.
7. Condition 4.3 of this *Approval* does not apply to a *Site* identified in Schedule "C" of this approval as being part of the *Emissions Abatement Plan* for noise emissions until the compliance date specified in the *Emissions Abatement Plan* for noise emissions from that *Site*.

## 5. DOCUMENTATION REQUIREMENTS

1. The *Company* shall maintain an up-to-date *Log* that describes each *Modification* to the *Facility* including but not limited to:
  - a. an *ESDM Report* that demonstrates compliance with the *Performance Limits* for each *Site*;
  - b. an *Acoustic Assessment Report* that demonstrates compliance with the *Performance Limits* for each *Site*;
  - c. list of all *Compounds of Concern* for which a request for approval of an *Acceptable Point of Impingement Concentration* was submitted to the *Director* for review by the *Air Standards Manager* pursuant to Condition 3.2 of this *Approval*;
  - d. if the *Company* has modified a *Site* and was not required to submit a request for approval of an *Acceptable Point of Impingement Concentration* with respect to a *Compound of Concern* under Condition 3.2, a list and concentration level of all such *Compounds of Concern*;
  - e. a review of any changes to *Ministry Point of Impingement Limits* that affect any *Compounds of Concern* emitted from the *Facility*;
  - f. a table of the changes in the emission rate of any *Compound of Concern* and the resultant increase or decrease in the *Point of Impingement* concentration reported in the *ESDM Report*;
  - g. an updated list of *Company Buildings*, identifying their addresses and/or UTM Coordinate locations;
  - h. an updated list of *Company* power generators, identifying their addresses and/or UTM Coordinate locations;
  - i. an updated list of *Company* paint spray booths, identifying their addresses and/or UTM Coordinate locations;
  - j. an updated list of *Company Gate Stations*, identifying their addresses and/or UTM Coordinate locations; and
  - k. a summary of all activities related to continuous improvement undertaken in the previous calendar year.
2. No later than June 30 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 .

3. 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 website of the *Company* or by making it available during regular business hours at the head office of the *Company*.
4. The *Company* shall, within three (3) months after the expiry of Condition 2.1 of this *Approval*, update the *ESDM Report* and the *Acoustic Assessment Report* such that the information in the reports is accurate as of the date that Condition 2.1 of this *Approval* expired.
5. Conditions 5.1 and 5.2 do not apply if Condition 2.1 has expired.
6. The *Company* shall maintain a summary of its annual training of its employees and make the summary available to the *Ministry* upon request.
7. The *Company* shall maintain a summary of the *Third Party Verification/Self-Assessment Program* schedule and results of each *Third Party Verification/Self-Assessment Program*.

## 6. REPORTING REQUIREMENTS

1. Subject to Condition 6.2, the *Company* shall provide the *Director* no later than August 31 of each year, a *Written Summary Form* to be submitted through the *Ministry's* website that shall include the following:
  - a. a declaration of whether the *Facility* was in compliance with section 9 of the *EPA*, *O. Reg. 419/05* and the conditions of this *Approval*;
  - b. a summary of each *Modification* satisfying Condition 2.1.a. and 2.1.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*.
  - c. an updated list of *Company Buildings*, identifying their addresses and/or UTM Coordinate locations;
  - d. an updated list of *Company* power generators, identifying their addresses and/or UTM Coordinate locations;
  - e. an updated list of *Company* paint spray booths, identifying their addresses and/or UTM Coordinate locations;
  - f. an updated list of *Company Gate Stations*, identifying their addresses and/or UTM Coordinate locations;
  - g. a summary of all activities related to continuous improvement undertaken in the previous calendar year; and
  - h. a summary of the *Third Party Verification/Self-Assessment Program* schedule and results of each *Third Party Verification/Self-Assessment Program* conducted in the previous calendar year.
2. Condition 6.1 does not apply if Condition 2.1 has expired.

## 7. OPERATION AND MAINTENANCE

1. 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:
  - a. frequency of inspections and scheduled preventative maintenance;
  - b. procedures to prevent upset conditions;
  - c. procedures to minimize all fugitive emissions;
  - d. procedures to prevent and/or minimize odorous emissions;
  - e. procedures to prevent and/or minimize noise emissions; and
  - f. procedures for record keeping activities relating to the operation and maintenance programs.

2. 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.

## 8. COMPLAINTS RECORDING AND REPORTING

1. 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:
  - a. Record and number each complaint, either electronically or in a log book. The record shall include the following information: the *Site*, the time and date of the complaint and incident to which the complaint relates, the nature of the complaint, wind direction at the time and date of the incident to which the complaint relates and, if known, the address of the complainant.
  - b. 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*.
  - c. 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.
  - d. 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.

## 9. RECORD KEEPING REQUIREMENTS

1. Any information requested by any employee in or agent of the *Ministry* concerning the *Facility* and its operation under this *Approval*, including, but not limited to, any records required to be kept by this *Approval*, shall be provided to the employee in or agent of the *Ministry*, upon request, in a timely manner.
2. 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,
  - a. a copy of the *Original ESDM Report* and each updated version;
  - b. a copy of each version of the *Acoustic Assessment Report*;
  - c. supporting information used in the emission rate calculations performed in the *ESDM Reports* and *Acoustic Assessment Reports*;
  - d. the records in the *Log*;
  - e. all documentation prepared in accordance with Condition 5.1 of this *Approval*;
  - f. copies of each *Written Summary Form* provided to the *Ministry* under Condition 6.1 of this *Approval*;
  - g. records of maintenance, repair and inspection of *Equipment* related to all *Processes with Significant Environmental Aspects*; and
  - h. all records related to environmental complaints made by the public as required by Condition 8 of this *Approval*.

## 10. MONITORING REQUIREMENTS - TURBINE COMPRESSORS SOURCE TESTING

1. After the installation, commissioning and testing of each turbine compressor installed since March 1994, including Bright Compressor Station Unit C; Lobo Compressor Station Unit D; and Dawn Compressor Station Unit H; has been completed, the *Company* shall monitor the emissions and operation of each turbine compressor as follows:
  - a. The *Company* shall perform *Source Testing* once after the commencement of the operation of the turbine compressor to determine the rates of emission of the *Test Contaminants* from the turbine compressor. Three (3) source tests shall be conducted at operational steady state condition and at the desired/required maximum load/rating.

- b. The *Company* shall submit, not later than three (3) months after the commencement of the operation of the turbine compressor or the date of issue of this *Approval*, to the *Manager* a test protocol, including the *Pre-Test Information* for the *Source Testing* required by the *Source Testing Code*. The *Company* shall finalize the test protocol in consultation with the *Manager*.
- c. The *Company* shall:
  - 1. complete the *Source Testing* for the turbine compressors, Bright Compressor Station Unit C; Lobo Compressor Station Unit D; and Dawn Compressor Station Unit H, not later than March 31, 2018; and
  - 2. ensure that *Source Testing* be performed only when the turbine compressors Bright Compressor Station Unit C; Lobo Compressor Station Unit D; and Dawn Compressor Station Unit H, have consistently achieved operational steady state condition and at the desired/required maximum load/rating.
- d. The *Company* shall notify 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*.
- e. The *Company* shall submit a report on the *Source Testing* to the *District Manager* and the *Manager* not later than two (2) months after completing the *Source Testing*. The report shall be in the format described in the *Source Testing Code* and shall include the following:
  - 1. an executive summary;
  - 2. all records of the operating conditions;
  - 3. source and fuel analysis of the natural gas burned at the time of the *Source Testing*; and
  - 4. all results and average of the source tests obtained during the *Source Testing*.
- f. 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; or
  - 2. the *Company* did not notify the *District Manager* and the *Manager* of the *Source Testing*;
  - or
  - 3. the *Company* failed to provide a complete report on the *Source Testing*.
- g. If the *Director* does not accept the results of the *Source Testing*, the *Director* may require the *Company* to repeat *Source Testing*.
- h. The *Company* shall perform a test, when the *Source Testing* is conducted, to determine the *Thermal Efficiency* of each turbine compressor described in Schedule "D" of this *Approval*. The *Company* shall:
  - 1. determine the parameters described in Schedule "E" of this *Approval* during the *Thermal Efficiency* testing;
  - 2. calculate the *Thermal Efficiency* of the turbine compressor according to the formula described in Schedule "E" of this *Approval*; and
  - 3. prepare a summary of the results of the *Thermal Efficiency Testing* no later than two (2) months after completing the test. The summary shall indicate the *Thermal Efficiency* of the turbine compressor and also include all parameters described in Schedule "E" of this *Approval*.

#### 11. THIRD PARTY VERIFICATION/SELF-ASSESSMENT PROGRAM

- 1. The *Company* shall ensure that the *Third Party Verification/Self-Assessment Program* is conducted for the *Sites* in accordance with Schedule "G" of this *Approval* and the following provisions:
  - a. At the end of each calendar year, the *Principal EHS Technical Advisor* shall finalize the *Third Party Verification/Self-Assessment Program* schedule for the following year, including the dates of the *Third Party Verification/Self-Assessment Program* and the *Sites* to be

- verified/self-assessed. The schedule shall be forwarded to the *District Manager*; and
- b. The *Company* shall report on the schedule and results of the *Third Party Verification/Self-Assessment Program* in accordance with the provisions of Condition 6.1.h., Reporting Requirements of this *Approval*.

## 12. EQUIPMENT WITH SPECIFIC OPERATIONAL LIMITS

1. The *Company* shall ensure that the fume incinerator(s) at each *Site* described in Schedule "B" is designed and operated to comply, at all times, with the following performance requirements:
  - a. the exhaust gases from the dehydrator shall not be introduced into the fume incinerator until the temperature in the combustion chamber has reached a minimum temperature of 900 degrees Celsius, as measured by the continuous temperature monitor;
  - b. the temperature in the combustion chamber, as measured by the continuous temperature monitor, shall be maintained at a minimum temperature of 900 degrees Celsius at all times, when the fume incinerator is in operation;
  - c. the residence time of the combustion gases in the combustion chamber shall not be less than 0.75 second at a temperature of 900 degrees Celsius; and
  - d. the concentration of organic matter in the undiluted flue gas leaving the fume incinerator, having a carbon content, expressed as equivalent methane, being an average of ten measurements taken at approximately one minute intervals, shall not be greater than 100 parts per million by volume, measured on an undiluted basis.
2. The *Company* shall install, conduct and maintain a program to continuously monitor the temperature in the combustion chamber, at all times, when the fume incinerator is in operation at each *Site*. The continuous monitoring system shall be equipped with a continuous recording device and shall comply with the requirements outlined in Schedule "F".
3. 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, maintenance and monitoring activities required by this *Approval*, and make these records available for review by staff of the *Ministry* upon request. The *Company* shall retain for each *Site*:
  - a. all records on the maintenance, repair and inspection of the fume incinerator and the continuous monitoring and recording device;
  - b. all records produced by the continuous monitoring system; and
  - c. all records of the failure of the fume incinerator resulting in a direct discharge of the exhaust gases into the atmosphere, including the date, duration, causes of the incidents and measure taken to address the failure.

## 13. MISCELLANEOUS

1. The *Company* shall operate the turbine compressors as the following:
  - a. Lobo Compressor Station: maximum of three (3) turbine compressors at any given time; and
  - b. Bright Compressor Station: maximum of three (3) turbine compressors at any given time.

## 14. ACOUSTIC AUDIT

1. In accordance with the provisions of *Schedule "C"*, the *Company* shall carry out *Acoustic Audit* measurements on the actual noise emissions due to the operation of the *Facility*. The *Company*:
  - a. shall carry out *Acoustic Audit* measurements in accordance with the procedures in *Publication NPC-103*;
  - b. shall submit an *Acoustic Audit Report* on the results of the *Acoustic Audit*, prepared by an *Independent Acoustical Consultant*, in accordance with the requirements of *Publication NPC-233*, to the *District Manager* and the *Director*.
2. The *Director*:

- a. may not accept the results of the *Acoustic Audit* if the requirements of *Publication NPC-233* were not followed;
- b. may require the *Company* to repeat the *Acoustic Audit* if the results of the *Acoustic Audit* are found unacceptable to the *Director*.

#### 15. REVOCATION OF PREVIOUS APPROVALS

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

### SCHEDULE A

#### Supporting Documentation

1. Three (3) Environmental Compliance Approval Applications, dated June 2, 2017, signed by Peter Mussio and submitted by the *Company*;
2. Letter dated June 6, 2017 from ORTECH to the Ontario Ministry of the Environment and Climate Change.
3. Email dated September 6, 2017 from the *Company* to the Environment and Climate Change;
4. Application for Approval (Air & Noise), dated July 8, 2015, signed by Mr. Peter Mussio and submitted by the *Company*.
5. Application for Approval (Air & Noise), dated April 29, 2013, signed by Mr. Peter Mussio and submitted by the *Company*.
6. Application for Approval (Air & Noise), dated January 19, 2012, signed by Mr. Mark Isherwood and submitted by the *Company*.
7. Emission Summary and Dispersion Modelling Reports, prepared by ORTECH Environmental:
  - a. 167 Pool Station, ORTECH Report 91115-2-2, dated March 1, 2013
  - b. Airport Pool Station, ORTECH Report 91115-2-18, dated March 1, 2013
  - c. Bickford/Sombra Pool Station, ORTECH Report 91115-2-3, dated March 12, 2013
  - d. Dow A Pool Station, ORTECH Report 91115-2-4, dated March 12, 2013
  - e. Edys Mills Pool Station, ORTECH Report 91115-2-5, dated March 1, 2013
  - f. Enniskillen Pool Station, ORTECH Report 90745-3-6, dated April 27, 2010
  - g. Heritage Pool Station, ORTECH Report 91115-2-19, dated March 1, 2013
  - h. Oil Springs Pool Station, ORTECH Report 91115-2-7, dated March 12, 2013
  - i. Payne Pool Station, ORTECH Report 91115-2-8, dated February 3, 2014
  - j. Waubuno Pool Station, ORTECH Report 90898-2, dated August 24, 2011
  - k. Bright Compressor Station, ORTECH Report 91755-2-16, dated June 2, 2017
  - l. Dawn Compressor Station, ORTECH Report 91755-2-15, dated June 2, 2017
  - m. Hagar Compressor Station, ORTECH Report 91115-2-13, Dated March 22, 2013
  - n. Iroquois Falls Compressor Station, ORTECH Report 90476-2-11, dated June 27, 2008
  - o. Lobo Compressor Station, ORTECH Report 91755-2-10, dated June 2, 2017
  - p. Parkway Compressor Station, ORTECH Report 90273-A, dated January 24, 2007
  - q. Parkway West Compressor Station, ORTECH Report 91192-2-20 rev 1, dated June 25, 2013
  - r. Sandwich Compressor Station, ORTECH Report 90476-2-12, dated June 27, 2008.
8. Emission Summary and Dispersion Modelling Report, prepared by Gamsby and Mannerow Limited:
  - a. Tipperary Pool Station, dated February 13, 2008.
9. Acoustic Assessment Reports, prepared by HGC Engineering:
  - a. 167 Pool Station, dated June 27, 2008

- b. Airport Pool Station, dated August 28, 2008
  - c. Bickford/Sombra Pool Station, dated April 12, 2013
  - d. Dow A Pool Station, dated June 27, 2008
  - e. Edys Mills Pool Station, dated June 27, 2008
  - f. Enniskillen Pool Station, dated June 27, 2008
  - g. Heritage Pool Station, dated August 28, 2008
  - h. Oil Springs Pool Station, dated June 27, 2008
  - i. Payne Pool Station, dated June 27, 2008
  - j. Waubuno Pool Station, dated April 12, 2013
  - k. Bright Compressor Station, dated May 18, 2017
  - l. Dawn Compressor Station, dated July 8, 2015
  - m. Hagar Compressor Station, dated April 12, 2013
  - n. Iroquois Falls Compressor Station, dated April 12, 2013
  - o. Lobo Compressor Station, dated May 31, 2017
  - p. Parkway Compressor Station, dated January 19, 2007
  - q. Parkway West Compressor Station, dated April 25, 2013
  - r. Sandwich Compressor Station, dated November 7, 2012
  - s. Tipperary Pool Station, dated July 27, 2012.
10. Acoustic Assessment Report, Windsor Office Building, prepared by Conestoga-Rovers & Associates, dated July 2008.
  11. Acoustic Assessment Report, Union Gas Gate Stations in Ontario, prepared by HGC Engineering, dated April 12, 2013.
  12. Acoustic Assessment Report, Union Gas Power Generators in Ontario, prepared by HGC Engineering, dated May 1, 2013.
  13. Power Generator ESDM Reports, prepared by ORTECH Environmental:
    - a. Belrose Gate Station Stand-by Power Generator, dated April 9, 2013
    - b. Brantford Building Emergency Generator, dated June 7, 2008
    - c. Bronte Gate Station Power Generator, dated April 9, 2013
    - d. Chatham Keil Drive Building Emergency Generator, June 20, 2008
    - e. Chatham Regional Building Emergency Generator, June 27, 2008
    - f. Waterloo Power Generator, dated December 22, 2011
    - g. Dunnville Building Emergency Generator, dated June 27, 2008
    - h. London Power Generator, dated December 22, 2011
    - i. Hamilton Gate Stations 1&2 Emergency Generator, dated June 27, 2008
    - j. Kingston Building Emergency Generator, dated June 27, 2008
    - k. Leamington Building Emergency Generator, June 27, 2008
    - l. Lennox SMS Gate Station Power Generator, April 9, 2013
    - m. Hamilton Service Centre Stand-by Power Generator, dated December 5, 2013
    - n. London North Gate Station Emergency Generator, dated June 27, 2008
    - o. Montieth Power Generator, dated August 15, 2008
    - p. North Bay Building Emergency Generator, dated June 27, 2008
    - q. Payne Kimball Gate Station Power Generator, June 27, 2008
    - r. Sarnia Building Emergency Generator, dated June 27, 2008
    - s. Simcoe Building Emergency Generator, dated June 27, 2008
    - t. Stratford Building Emergency Generator, dated June 27, 2008
    - u. St. Thomas Building Emergency Generator, dated June 27, 2008
    - v. Sudbury Building Emergency Generator, June 27, 2008
    - w. Thunder Bay Building Emergency Generator, dated June 27, 2008

- x. Timmins Building Emergency Generator, dated June 27, 2008
- y. Windsor Office Power Generator, dated November 22, 2013
- 14. Buildings Assessment Documents including the following:
  - a. Buildings Assessment Report (Report No.: 91115-3-1), dated February 27, 2014, prepared by ORTECH Environmental.
  - b. Burlington Office ESDM Report, dated February 27, 2014
  - c. Chatham Paint Spray Booth ESDM Report, dated August 15, 2008
  - d. North Bay Paint Spray Booth ESDM Report, dated April 26, 2010
- 15. Assessment Protocols which include the following:
  - a. Assessment Protocol for Compressor Stations, Report No.: 91115-2, dated February 27, 2014, prepared by ORTECH Environmental.
  - b. Union Gas Assessment Protocol for Service Centres and Other Buildings Air and Noise Emissions, Report No.: 91115-3, dated February 15, 2013, prepared by ORTECH Environmental.
  - c. Union Gas Assessment Protocol for Power Generator Air and Noise Emissions, Report No.: 91115-4, dated: February 7, 2013, prepared by ORTECH Environmental.
  - d. Assessment Protocol for Gate Station Emissions, Report No.: 91115-1, dated March 18, 2013, prepared by ORTECH Environmental.
- 16. Gate Station Assessment Report, Report No.: 91115-1-1, dated February 28, 2013, prepared by ORTECH Environmental
- 17. Acoustic Assessment Report, Mountain Transit Centre, prepared by HGC Engineering, dated May 26, 2015.
- 18. All other supporting documentation and correspondences.

## SCHEDULE B

### LIST OF COMPRESSOR/STORAGE POOL STATIONS

Name	Number of Fume Incinerators	Address	Municipality	UTM Easting	UTM Northing
167 Pool Station	2	Lot 34, Concession 12	Dawn	415,527	4,734,323
Sombra/Bickford Pool Station	1	Lot 31 Concession 1	Sombra	383,332	4,730,388
Dow A Pool Station	1	Lots 8 & 9 of Plan 13	Moore	389,074	4,752,965
Edys Mills Pool Station	1	Lot 33 Concession 8	Dawn	408,750	4,733,625
Enniskillen Pool Station	n/a	Lot 1 Concession 4	Enniskillen	398,812	4,739,830
Oil Springs Pool Station	1	Lot 22 Concession 1	Enniskillen	412,165	4,736,040
Payne Pool Station	n/a	21 Concession 7	Moore	386,166	4,744,690
Waubuno Pool Station	n/a	Lot 9 Concession 2	Moore	393,437	4,737,640
Lobo Compressor Station	n/a	11025 Ivan Drive	Ilderton	463,429	4,764,379
Iroquois Falls Compressor Station	n/a	1219 Genest Road	Iroquois Falls	520,264	5,399,959

Sandwich Compressor Station	n/a	2105 8th Concession	Sandwich South	399,518	4,678,122
Hagar Compressor Station	n/a	317 Northern Road	Sudbury	543,494	5,144,009
Dawn Compressor Station	n/a	3332 Bentpath Line	Dresden	399,886	4,729,607
Bright Compressor Station	n/a	Lots 3 & 4 Concession 10 Blandford-Blenheim Township	Oxford County	526,336	4,789,613
Parkway Compressor Station	n/a	6626 9th Line Road	Milton	598,183	4,824,745
Airport Compressor Station	n/a	4793 Mandaumin Road, Lot 1 Concession 1	St. Clair	399,173	4,752,078
Heritage Compressor Station	1	454 Bickford Line, Lot 26, Concession 1	St. Clair	383,108	4,735,881
Parkway West Compressor Station	n/a	6679 Eighth Line	Milton	597,028	4,824,655
Tipperary Pool Station	n/a	Part of Lots 86 and 87, Concession Maitland	Central Huron	449,796	4,833,921

## SCHEDULE C

### EMISSION ABATEMENT PLAN

Table 1: NOISE EMISSIONS

Compressor Station	Source Name	Compliance Date
Dawn Compressor Station	B,C,D,E & G Cooler Fans, Piping & Building Upgrades	December 2017
Dawn Compressor Station	Incinerator & Reboiler 1 & 2 Exhaust	December 2017
Dawn Compressor Station	Aux 3 Building	December 2017
Dawn Compressor Station	Independent <i>Acoustic Audit</i>	December 2017

Table 2: NOISE EMISSIONS

Maintenance, Storage and Refuelling Facility	Source	Action
Mountain Transit Centre	Facility	Detailed Mitigation Plan

### NOISE ABATEMENT REQUIREMENTS

The noise abatement requirements at the compressor stations identified in this Schedule are described in the following table. Details of the requirements are provided in the applicable *Acoustic Assessment Report*:

Compressor or Pool Station	Required Noise Reduction (dB)	Action
Dawn	14	Noise Control



		Measures
Parkway West	-	Independent <i>Acoustic Audit</i>

The noise abatement requirements at the gate stations identified in this Schedule are described in the *Acoustic Assessment Report* entitled "Acoustic Assessment Report, Union Gas Gate Stations in Ontario", prepared by HGC Engineering, dated April 12, 2013:

Gate Station	Required Noise Reduction (dB)	Action
Mowat Town Border	19	Independent <i>Acoustic Audit</i>
London Baseline	11	Independent <i>Acoustic Audit</i>
Bruce Avenue	7	Independent <i>Acoustic Audit</i>
St. Hilaire DRS	7	Independent <i>Acoustic Audit</i>
Matchette and Prince	7	Independent <i>Acoustic Audit</i>
Cobourg TBS	7	Independent <i>Acoustic Audit</i>
Clinton	7	Independent <i>Acoustic Audit</i>
LaSalle Town Border	6	Independent <i>Acoustic Audit</i>
Corbyville TBS	6	Independent <i>Acoustic Audit</i>
Norwich Brick	5	Independent <i>Acoustic Audit</i>
Mckinlay Road	5	Independent <i>Acoustic Audit</i>

The noise abatement requirements at the Mountain Transit Centre identified in this Schedule are described in the *Acoustic Assessment Report* entitled "Acoustic Assessment Report, Mountain Transit Centre, Hamilton, Ontario", prepared by HGC Engineering, dated May 26, 2015.

## SCHEDULE D

### LIMITS FOR NEW TURBINE COMPRESSORS

Parameter	Limits - Bright Unit C	Limits - Lobo Unit D	Limits - Dawn Unit H
Nitrogen Oxides	30 ppmv	30 ppmv	30 ppmv
Carbon Monoxide	60 ppmv	60 ppmv	60 ppmv
Sulphur Dioxide	122 ppmv	122 ppmv	122 ppmv
Thermal Efficiency	36 percent	36 percent	36 percent

#### NOTE:

"ppmv" means parts per million by volume on a dry basis normalized to 15 percent oxygen on an hourly basis.

## SCHEDULE E

### PARAMETERS FOR TURBINE COMPRESSORS

1. Power Output
2. Fuel Flow Rate
3. Lower Heating Value
4. Ambient air temperature (Celsius)
5. Barometric pressure (kiloPascal)

- 6. Relative humidity (percent)
- 7. Date, time and duration of test.

**FORMULA**

**Thermal Efficiency equals Power Output multiplied by 100 percent divided by Fuel Flow Rate and then divided by Lower Heating Value .**

**NOTE:**

Thermal Efficiency testing should be conducted at maximum rating or at the maximum load achievable at the time of testing and shall employ an averaging time of not less than three hours.

**SCHEDULE F**

**CONTINUOUS TEMPERATURE MONITORING**

**PARAMETER**

Temperature

**LOCATION**

The sample point for the continuous temperature monitoring and recording system shall be located where the measurements are representative of the minimum temperature of the gases leaving the combustion chamber of the fume incinerator.

**PERFORMANCE**

The continuous temperature monitor shall meet the following minimum performance specifications for the following parameters:

<b>PARAMETERS</b>	<b>SPECIFICATION</b>
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% of the time for each calendar quarter.

**SCHEDULE G**

**THIRD PARTY VERIFICATION/SELF-ASSESSMENT PROGRAM**

**Purpose**

The purpose of the *Third Party Verification/Self-Assessment Program* is to independently verify the progress of the implementation of the *Emission Abatement Plan* and the compliance status of the *Sites* listed in Schedule C. Consistent with the risk-based approach and the *Company* 's internal audit

program, *Third Party Verification/Self-Assessment Program* need not be carried out for gate stations, metering and regulating stations or buildings, unless warranted by special circumstances. The *Third Party Verification/Self-Assessment Program* shall be coordinated with the *Company's* current Environmental, Health and Safety (EHS) Assurance Program.

The program consists of the following three components: (a) continuation of the existing *Third Party Verification Program*; (b) addition of a complementary *Self-Assessment Program*; and (c) provision of a generic framework for re-inspection of sites where warranted.

*Third Party Verification Program* will focus on sites where implementation of control measures are still required or new sites that are not included in the current inspection cycle. The *Self-Assessment program* will focus on the *Company's* smaller, less complex Storage Pool Stations.

## **Roles and Responsibilities**

The *Principal EHS Technical Advisor* shall have the overall responsibility of overseeing the *Third Party Verification/Self-Assessment Program*. The *Third Party Verification program* shall be conducted by a *Third Party Consultant* and the *Self-Assessment Program* shall be carried out either internally by the *Company* staff or by a *Third Party Consultant*.

## **Scope**

The scope of the *Third Party Verification/Self-Assessment Program* is similar to an inspection carried out by a *Ministry* Environmental Officer (i.e., paper verification of compliance with the conditions of the *Approval* and informal assessment of odours and noise). Testing would not be required unless warranted by special circumstances. The *Self-Assessment Program* will include standard techniques such as checklists, site observations, interview and documentation review.

## **Schedule**

1. *Third Party Verification/Self-Assessment Program* would be conducted in accordance with the schedules [referenced in Appendix A (updated on September 6, 2017) and Appendix B of the Application for Approval (Air & Noise) Section B.4] included in the application dated April 29, 2013. The *Company* will advise the *Ministry* on, by the end of each year, the sites to be verified/self-assessed in the following year and any adjustments to the schedules. *The Self-Assessment Program began in 2014 and all Storage Pools listed in Schedule B shall be self-assessed or verified by a Third Party Consultant by the end of 2018.*
2. Allowance shall be provided for special verification/self-assessment requests not included in the original plans, made either by staff of the *Ministry* or the *Company*.

## **Reporting**

1. The *Third Party Verification/Self-Assessment Program* report shall be submitted to the *District Manager* no later than three (3) months after the completion of the inspection for that *Site*.
2. A summary of the *Third Party Verification/Self-Assessment Program* shall be included in the annual report submitted to the *Director*, as described in section 5, Reporting Requirements of this *Approval*.
3. In the event that the *Third Party Verification/Self-Assessment Program* finds non-compliance with the *Performance Limits*, the *Company* shall submit an abatement plan to the *District Manager* within three (3) months of the date of the *Third Party Verification/Self-Assessment Program* report unless the *Third Party Verification/Self-Assessment Program* that found non-compliance was for a *Site* listed on the *Emission Abatement Plan* found in Schedule "C" of this *Approval*, and the *Third Party Verification/Self-Assessment Program* was conducted prior to the compliance date listed therein for that *Site*.

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

#### 1. GENERAL

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

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

1. 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. DOCUMENTATION REQUIREMENTS

1. Condition No. 5 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*.

#### 4. REPORTING REQUIREMENTS

1. Condition No. 6 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*.

#### 5. OPERATION AND MAINTENANCE

1. Condition No. 7 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.

#### 6. COMPLAINTS RECORDING AND REPORTING PROCEDURE

1. Condition No. 8 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.

#### 7. RECORD KEEPING REQUIREMENTS

1. Condition No. 9 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 4 of this *Approval* is necessary.

#### 8. MONITORING REQUIREMENTS AND THIRD PARTY VERIFICATION/SELF-ASSESSMENT PROGRAM

1. Conditions No. 10 and 11 are included to require the *Company* to gather accurate information so that environmental impact and subsequent compliance with the *EPA*, the regulations and this *Approval* can be verified.

## 9. EQUIPMENT WITH SPECIFIC OPERATIONAL LIMITS

1. Condition No. 12 is included to emphasize that the *Equipment with Specific Operational Limits* must be maintained and operated according to a procedure that will result in compliance with the *EPA*, the regulations and this *Approval*.

## 10. MISCELLANEOUS

1. Condition No. 12 is included to provide the minimum performance requirements considered necessary to prevent an adverse effect resulting from the operation of the *Facility*.

## 11. ACOUSTIC AUDIT

1. Condition No. 13 is included to require the *Company* to gather accurate information so that the environmental noise impact and subsequent compliance with the *EPA*, Regulations, *Ministry* Noise Guidelines and this *Approval* can be verified.

## 12. REVOCATION OF PREVIOUS APPROVALS

1. Condition No. 14 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). 7550-AHJU6T issued on January 20, 2017**

*In accordance with Section 139 of the Environmental Protection Act, you may by written Notice served upon me and the Environmental Review Tribunal within 15 days after receipt of this Notice, require a hearing by the Tribunal. Section 142 of the Environmental Protection Act provides that the Notice requiring the hearing shall state:*

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

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

*The Notice should also include:*

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

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

*This Notice must be served upon:*

The Secretary\*  
Environmental Review Tribunal

AND

The Director appointed for the purposes  
of Part II.1 of the Environmental

655 Bay Street, Suite 1500  
Toronto, Ontario  
M5G 1E5

Protection Act  
Ministry of the Environment and 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](http://www.ert.gov.on.ca)**

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

DATED AT TORONTO this 20th day of September,  
2017

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

ST/  
c: District Manager, MOECC London - District  
Hank Van Bakel, ORTECH Consulting Inc.