

**MONTHLY ENGINEER'S REPORT:
PLASCO TRAIL ROAD INC. – ENERGY-FROM-WASTE FACILITY**

Monthly Engineer's Report

PLASCO TRAIL ROAD INC. ENERGY-FROM WASTE FACILITY

Review Period: 1 November 2011 to 30 November 2011



DECOMMISSIONING CONSULTING SERVICES LIMITED

HEAD OFFICE
121 Granton Drive, Unit 11
Richmond Hill, Ontario
Canada L4B 3N4

Tel: (905) 882-5984
Fax: (905) 882-8962

Specialists in Property Assessments & Environmental Audits, Site Remediation & Decommissioning, Geotechnical Engineering, Contaminant & Physical Hydrogeology, Waste & Wastewater Treatment & Management, Risk Assessment, Ordnance Control, Infection Control, Brownfields Development Strategies & Industrial Hygiene

E-mail: engineers@dcsdtd.ca
Web Site: <http://www.dcsdtd.ca>

OTTAWA OFFICE Tel: (613) 230-2405 Fax: (613) 230-1403

**MONTHLY ENGINEER'S REPORT:
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EXECUTIVE SUMMARY

Under Condition 46.a of Provisional Certificate of Approval (Waste Disposal Site) Number 3166-6TYMDZ a Professional Engineer must visit the Plasco Trail Road Inc. Energy-From-Waste Facility on a monthly basis to observe and report on the operations of the Site to verify compliance with the requirements of the Provisional Certificate of Approval (Waste Disposal Site) and Certificate of Approval (Air) Number 4315-8JVP3K. Decommissioning Consulting Services (DCS) Limited staff has been retained to provide this monthly review. This report summarizes the review covering the period 1 November 2011 to 30 November 2011.

Key observations noted and conclusions resulting from the monthly visit are summarized below:

Based on available information and observations made during the site visit, we believe that the Plasco Trail Road operations are in substantial compliance with the applicable Certificates of Approval (Waste Disposal Site #3166-6TYMDZ and Air #4315-8JVP3K).

The Plasco Trail Road facility was not producing Syngas at the time of inspection and is in preparation for permanent operations.

Two spills occurred in November 2011. In both cases, the facility processes were down for maintenance; no gasification was being conducted. On November 13, 2011 a treated water spill occurred in which a maximum of 15 L spilled to the gravel near the treated water holding tanks. No spilled material escaped from the property. The MOE was notified of the spill. The spill was caused by a mishandling of a pipe during pipe disconnection and berm construction work. A secondary containment facility is under construction to collect any potential for spilled treated water in the future.

On 22 November 2011, less than 5 L of urea solution was estimated to have been spilled to the gravel near the newly installed Urea tank. The solution was thought to have dripped from the tank. The tank integrity is to be checked. A temporary sand berm and spill socks are in place to absorb minor drips. There were no offsite impacts. The MOE was notified of the spill. The tank supplier is to provide suitable storage totes for use in the interim.

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**MONTHLY ENGINEER'S REPORT:
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1.0 PURPOSE OF MONTHLY ENGINEER'S REPORT

Under Condition 46.a of Provisional Certificate of Approval (Waste Disposal Site) Number 3166-6TYMDZ a Professional Engineer must visit the Plasco Site (the Site) on a monthly basis to observe and report on the operations of the Site to verify compliance with the requirements of the conditions of the Provisional Certificate of Approval (Waste Disposal Site) and the Certificate of Approval (Air) Number 4315-8JVP3K. The inspections are to include a detailed walkthrough of the entire Site and a thorough review of the daily Site inspection records and the daily log book records required by Conditions 44 and 60, respectively, of the Provisional Certificate of Approval (Waste Disposal Site).

Condition 46.b of the Provisional Certificate of Approval (Waste Disposal Site) requires a report, signed by the Professional Engineer (the Monthly Engineer's Report), that summarizes the results of each inspection and certifies whether the Site has operated in substantial compliance with this Certificate since the previous report, to be provided to the District Manager.

This document serves as a means of formal monthly reporting on the status of Site operations to the Ministry of Environment.

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2.0 APPROVED LIMITS

Review Daily Logbook to verify conformance to Approved Limits

(Provisional Certificate of Approval NUMBER 3166-6TYMDZ, Term and Conditions 25 – 28)

Parameter	Daily Maximum for Month	Approved Limit	Units	Within Approved Limit (*)	
Truckloads of Waste Received	9.0	25	Trucks/day	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Waste Utilized	24.0	85	Tonnes/day	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Incoming Non-hazardous Waste Stored	83.9	595	Tonnes	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

* Provide comments for any "No" Responses

Comment 1:

Comment 2:

Comment 3:

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3.0 SUMMARY DATA – AIR APPROVAL

3.1 ENCLOSED FLARE CEMS MONITORING/CALIBRATION

(Certificate of Approval (Air) Number: 4315-8JVP3K, Terms and Conditions 2, 6.1)

Contaminant	Maximum Average (ppmv)(**)	Averaging Period	Within Approved Limit (*)	Daily Calibrations Completed (*)
Nitrogen Oxides	64 (105 until 24/02/2011)	Rolling arithmetic average of 24 hrs of data	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Hydrogen Chloride	3.5	Rolling arithmetic average of 24 hrs of data	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Sulphur Dioxide	13.5 (21 until 24/02/2011)	Rolling arithmetic average of 24 hrs of data	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Carbon Monoxide	26	Rolling arithmetic average of 4 hrs of data	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Total Hydrocarbons (Organic Matter)	30.5	10-minute average, expressed as equivalent methane	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Ammonia				Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Oxygen				Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

* Provide comments for any "No" Responses

Comment 1: Daily calibration data were reviewed for the November reporting period. Calibration data were within quality control limits.

Comment 2:

Comment 3:

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3.2 CEMS – RELIABILITY (COMPLETED FOR APRIL, JULY, OCTOBER AND JANUARY INSPECTIONS)
(Certificate of Approval (Air) Number: 4315-8JVP3K, Term and Condition 6.(1))

Contaminant	Quarterly Reliability%	Reliability Requirement Met (*)	Comments for No Response (*)
Nitrogen Oxides		Yes <input type="checkbox"/> No <input type="checkbox"/>	
Hydrogen Chloride		Yes <input type="checkbox"/> No <input type="checkbox"/>	
Sulphur Dioxide		Yes <input type="checkbox"/> No <input type="checkbox"/>	
Carbon Monoxide		Yes <input type="checkbox"/> No <input type="checkbox"/>	
Organic Matter		Yes <input type="checkbox"/> No <input type="checkbox"/>	
Ammonia		Yes <input type="checkbox"/> No <input type="checkbox"/>	
Temperature		Yes <input type="checkbox"/> No <input type="checkbox"/>	

* 90% required for first year, 95% required in subsequent years

3.3 SOURCE TESTING

(Certificate of Approval (Air) Number: 4315-8JVP3K, Term and Condition 6.(9))

Date of Last Source Test: The Company has until 24 January 2012 to submit a source test protocol to the MOE

Source Testing Completed within Last 6 Month: Yes No

Comments:

3.4 RATA DATA

(Certificate of Approval (Air) Number: 4315-8JVP3K, Term and Condition 8)

Date of Last RATA Test: The first RATA test must be completed by 24 October 2012

RATA Testing Completed within Last 12 Month +/- 1 Month: Yes No

Comments:

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4.0 DOCUMENT AND RECORDS REVIEW

No.	Provisional Certificate of Approval (Waste Disposal Site) NUMBER 3166-6TYMDZ Term and Condition	Validation Method	Concerns Identified	Comments (for identified concerns)
25	The Owner may only accept the following categories of Municipal Waste at the Site : a. Domestic Waste originating within the City of Ottawa; b. IC&I Waste originating within the City of Ottawa; c. Plastics and other non-hazardous, non-putrescible materials originating within the City of Ottawa that have been rejected from recycling and composting facilities; ; and d. Automotive shredded residuals.	1. Review daily log book. 2. Verify wastes sources and truck logs.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
26	A maximum of twenty-five (25) truckloads of waste may be received at the Site per day.	See Section 2.0, above.		
27	The Site is approved to utilize waste referred to in Condition 25 at a rate not to exceed 85 tonnes per day;	See Section 2.0, above.		
29b.	Waste shall only be received at the Site during the following hours: i. on Mondays, Tuesdays, Thursdays and Fridays between the hours of 7:00 a.m. and 6:00 p.m.; ii. on Wednesdays from April 15 to December 15 between the hours of 7:00 a.m. and 9:00 p.m.; iii. on Wednesdays from December 16 to April 14 between the hours of 7:00 a.m. and 6:00 p.m.; and iv. on Saturdays between the hours of 8:00 a.m. and 4:00 p.m	1. Review log book of waste deliveries to verify receiving hours	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

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No.	Provisional Certificate of Approval (Waste Disposal Site) NUMBER 3166-6TYMDZ Term and Condition	Validation Method	Concerns Identified	Comments (for identified concerns)
32a.	All waste arriving at the Site shall be inspected by a Trained person prior to being received at the Site to ensure wastes are being managed and disposed of in accordance with this Certificate, the EPA and Reg. 347.	1. Determine – are there any new employees? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2. If yes, verify new employee has received required training in accordance with training matrix	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	2 new employees- both received orientation training
32.b.i	Prior to receiving any automotive shredded residuals, the Owner shall require written confirmation, including laboratory testing results, from the generator of each automotive shredded residuals stream that the material has been tested and found to be non-hazardous.	1. Review log book to determine if shredded tires received from new source during month Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 1. If yes, verify generator written confirmation that waste is non-hazardous, including laboratory results	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	- no automotive shredded residuals or tires were received during this reporting period
32.b.ii	The Owner shall carry out confirmatory testing on each automotive shredded residual stream using a representative sample prior to subjecting that stream to thermal treatment at the Site for the first time. Any automotive shredded residual stream found to be hazardous shall not be subjected to thermal treatment at the Site, and no automotive shredded residuals shall be received from that generator until further testing by the generator and confirmatory testing by the Owner shows the automotive shredded residual stream to be non-hazardous.	1. Review log book to determine if shredded tires received from new source during month Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 2. If yes, confirm, residual tire stream only used if new source tested as non-hazardous	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

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32.b.iii	No less than once every 6 months, the Owner shall perform confirmatory testing on each automotive shredded residual stream using a representative sample. Any stream found to be hazardous shall not be subjected to thermal treatment at the Site, all waste loads from that generator shall be rejected from the Site, and no further automotive shredded residuals shall be received from that generator until further testing by the generator and confirmatory testing by the Owner shows the automotive shredded residual stream to be non-hazardous.	1. Review log book to determine if shredded tires processed during month Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 2. If yes, confirm, residual tire stream only used if that /those stream(s) tested as non-hazardous within last 6 months	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
33.	In the event that a load of waste is rejected, a record shall be maintained identifying the reason the waste was refused, the type of waste that was refused and the generator and/or the origin of the waste, if known	1. Review daily records. 2. For rejected loads, verify specified records are maintained.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
38.	A Procedures Manual specific to the Site shall be prepared prior to the acceptance of any waste at the Site . The Procedures Manual shall contain detailed standard operating procedures relating to all aspects of the handling and processing of waste at the Site and shall be maintained current at all times and kept at the Site in central location that is accessible to Site personnel.	1. Review operations for changes (physical or procedural). 2. Verify Procedures Manual is updated to reflect any changes. 3. Verify Procedures Manual readily available to staff.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Standard Operating Procedures binder is stored in Control Room; dated 30 Oct 2011

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No.	Provisional Certificate of Approval (Waste Disposal Site) NUMBER 3166-6TYMDZ Term and Condition	Validation Method	Concerns Identified	Comments (for identified concerns)
39b	In the event of a persistent odour issue at the Site that results in an off Site adverse impact the Owner shall implement additional odour control measures in accordance with the odour contingency plan.	1. Review complaint log for odour complaints. 2. Any odour complaints Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 3. If persistent odour issue identified, verify odour contingency measures implemented	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
40a	Domestic Waste received at the Site shall be utilized within ninety-six (96) hours.	1. Review records to verify wastes utilized within 96 hours	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
40b	Domestic Waste shall be removed from the loading/unloading area for disposal at an approved waste disposal site within ninety-six (96) hours during emergency situations, mechanical failure or process upsets.	1. Review operational records to determine if emergency situations, mechanical failure or process upsets. 2. If yes, review records to verify removal of waste within prescribed time.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
41.	The tipping floor shall be cleaned following each day's operation and shall be disinfected as necessary.	1. Review records to verify cleaning (or disinfections if necessary) completed	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
42a	All waste generated at the Site shall be disposed of in accordance with Reg. 347 <i>(Note: This includes subject waste, non-hazardous waste and recyclables)</i>	1. Review waste disposal records. 2. If any new wastes or disposal sites listed, verify wastes registered (as required) and carrier and receiver approved for these wastes.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

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42b	Only haulers approved by the Ministry shall be used to transport waste from the Site	1. Review waste disposal records. 2. If new haulers used, verify hauler has a valid (Provisional) Certificate of Approval for a Waste Management System for the waste.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	no new hauling firms used
44	A Trained Person shall inspect the entire Site each day the Site is in operation to ensure that: the Site is secure; that the operation of the Site is not causing any nuisances; that the operation of the Site is not causing any adverse effects on the environment and that the Site is being operated in compliance with this Certificate. Any deficiencies discovered as a result of the inspection shall be remedied immediately, including temporarily ceasing operations at the Site if needed. On each operating day, a visual inspection of the following areas shall be carried out: a. loading/unloading area(s); b. storage area(s); c. delivery system area(s); d. processing area(s); and e. security fence or barriers and property line.	See Term and Condition 45		

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45	<p>A record of the inspections shall be kept in the daily log book that includes the following information:</p> <p>i. the name and signature of person that conducted the inspection; ii. the date and time of the inspection; iii. a list of any deficiencies discovered; iv. any recommendations for action; and v. the date, time and description of actions taken.</p>	<ol style="list-style-type: none"> 1. Review Daily Shift Checklist and Rounds Checklist for prior month. 2. Verify inspections of all designated areas completed at least daily 3. Verify specified information is recorded 4. Review identified deficiencies and verify actions taken in a timely manner (This assessment may span more than one monthly report) 	<p>Yes <input type="checkbox"/></p> <p>No <input checked="" type="checkbox"/></p>	Daily Shift and Rounds checklists were reviewed
49b	<p>A record showing that all persons directly involved with activities relating to the Site have been trained in accordance with the requirements described in Condition 49a above shall be maintained at the Site at all times.</p>	<ol style="list-style-type: none"> 1. Review training plan. 2. Verify any refresher training provided per plan. 3. Verify all new staff trained per plan 	<p>Yes <input type="checkbox"/></p> <p>No <input checked="" type="checkbox"/></p>	
50	<p>A Trained Person (see definition in CofA) shall be available at all times during the hours of operation of this Site to carry out any activity required under this Certificate.</p>	<ol style="list-style-type: none"> 1. Review operating shift schedules to confirm at least one Trained Person present during operating hours 	<p>Yes <input type="checkbox"/></p> <p>No <input checked="" type="checkbox"/></p>	
51a	<p>If at any time a complaint is received regarding the operation of the Site, the complaint shall be responded to according to the procedures outlined below (items 51a) through 51d):</p> <p>The District Manager shall be notified in writing within 24 hours of the receipt of any complaint.</p>	<ol style="list-style-type: none"> 1. Review complaint records 2. Any complaints for month Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 3. Confirm District Manager notified of each complaint 	<p>Yes <input type="checkbox"/></p> <p>No <input checked="" type="checkbox"/></p>	

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51b	Each complaint shall be recorded and numbered, either electronically or in a separate logbook, and shall include the following information: i. the nature of the complaint, ii. if complaint is odour or nuisance related, the weather conditions and wind direction at the time of the complaint; iii. the address of the complainant (if provided); and iv. the time and date of the complaint	1. Review complaint records file. 2. Any complaints for month Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 3. Verify specified information is recorded for each complaint	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
51c	Appropriate steps shall be taken forthwith to determine all possible causes of the complaint and to eliminate the cause of the complaint. A written reply shall be provided to the complainant within three (3) days of the complaint; and	1. Review complaint records 2. Verify investigation and corrective actions implemented. 3. Verify written reply provided within 3 days	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
51d	A report written shall be completed and retained at the Site within one (1) week of the complaint date outlining the information required by subconditions a, b, and c above that details as appropriate, the actions taken to investigate the cause of and to resolve the complaint including any recommendations for remedial measures, and managerial or operational changes proposed and taken to reasonably avoid the recurrence of similar incidents.	1. Verify report prepared and retained for each complaint	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
53.	The Owner shall ensure that the Spill Contingency and Emergency Response Plan for the Site is reviewed annually and maintained current at all times.	1. Verify Plan revision date within one year (or verify review completed within last year).	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Spill Contingency and Emerg. Response plans, dated October 2011 were stored in Control Room

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54	The Spill Contingency and Emergency Response Plan shall be retained in a central location on the Site and shall be accessible to all staff at all times. The Owner shall ensure that the District Manager, the local Municipality and the Fire Department are notified of any changes to the Spill Contingency and Emergency Response Plan.	1. If revised since last inspection, obtain evidence that external copies distributed as required.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
56.	All staff that operate the Site shall be fully trained in the use of the Spill Contingency and Emergency Response Plan and in the procedures to be employed in the event of an emergency.	1. Determine if new staff on site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2. If yes, verify records of training for new staff.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

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No.	Provisional Certificate of Approval (Waste Disposal Site) NUMBER 3166-6TYMDZ Term and Condition	Validation Method	Concerns Identified	Comments (for identified concerns)
57.	The Owner shall immediately take all measures necessary to contain and clean up any spill or leak which may result from the operation of this Site and immediately implement the Spill Contingency and Emergency Response Plan if required.	1. Determine if any spills occurred Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2. If yes, review spill response 3. If yes, review affected area for evidence of impact.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Two spills had occurred in November 2011. In both cases, the facility processes were down for maintenance; no gasification was being conducted. On November 13, 2011 a treated water spill occurred in which a maximum of 15L spilled to the gravel ground near the treated water holding tanks. No spilled material escaped from the property. The MOE was notified of the spill. The cause of the spill was a mishandling of a pipe during pipe disconnection and berm construction work. A secondary containment facility is under construction to collect any future spilled treated water. On 22 November 2011, less than 5 L of urea solution was estimated to have been spilled to the gravel near the urea tank. The solution was thought to have dripped from the tank. The tank integrity is to be checked. A temporary sand berm and spill socks are in place to absorb minor drips. There were no offsite impacts. The MOE was notified of the urea spill.
58.	The Design and Operating Manual (DOM) shall be retained at the Site; kept up to date; and be available for inspection by Ministry staff. The Design and Operating Manual shall contain at a minimum the information specified for a waste processing site per the Ministry publication "Guide For Applying For Approval Of Waste Disposal Sites".	1. Verify DOM available. 2. Any changes in operations? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 3. If yes, verify DOM revised as required.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	A new DOM, dated 19 March 2011, is stored within the Control Room (document 141-RT-3561 rev A)
59.	Changes to the Design and Operating Manual shall be submitted to the Director for approval.	1. Any changes in DOM? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 2. If yes, verify record of MOE approval on file.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	The 18 March 2011 DOM was provided to the MOE for approval. The Certificate of Approval for a Waste Disposal site was issued to Plasco by the MOE, dated 24 October 2011.

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60.	<p>A daily log book or electronic file shall be maintained at the Site for a minimum of five years and shall include daily records of the pertinent information as listed in the C of A. All amounts must be recorded in metric:</p> <ul style="list-style-type: none"> a. the date; b. the types, amounts and sources of waste received at the Site; c. a record of any waste refusals which shall include: amounts, reasons for refusal and actions taken; d. the type and amounts of unprocessed and processed waste at the Site; e. the results of the sampling and analysis of the residual wastes generated at the Site, and the results of sampling and analysis carried out on any automotive shredded residual streams; f. the amounts and destination of each type of waste shipped from the Site; g. a record of daily inspections required by this Certificate; h. a record of any spills or process upsets at the site, the nature of the spill or process upset and the action taken for the clean up or correction of the spill, the time and date of the spill or process upset, and for spills, the time that the Ministry and other persons were notified of the spill in fulfilment of the reporting requirements in the EPA; and i. the signature of the person conducting the inspection and completing the report. 	<p>1. Review daily logs book entries for completeness of records</p>	<p>Yes <input type="checkbox"/></p> <p>No <input checked="" type="checkbox"/></p>	<p>Daily log book and data entries were reviewed for wastes received, wastes generated, and for site spills and process upsets.</p>

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5.0 SITE INSPECTION

No.	Provisional Certificate of Approval (Waste Disposal Site) NUMBER 3166-6TYMDZ Term and Condition	Validation Method	Concerns Identified	Comments (for identified concerns)
11.	Steps shall be taken to minimize and ameliorate any adverse effect on the natural environment or impairment of water quality that results from their operations at the Site , including such accelerated or additional monitoring as may be necessary to determine the nature and extent of the effect or impairment.	1. Inspect following areas for evidence of spills / leaks / releases or other adverse conditions: Litter (general site, especially around fence lines) Loading / unloading areas (MSW Bldg; HCF Storage) Storage Area (Exterior Solid Waste) Circulation/ Access Roads Raw/ Waste Liquids Storage Propane/Fuelling Areas Delivery System Area (GQCS) USB Building Processing (Engines/Flares)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	excess parts and equipment from the commissioning process are stored in middle west storage yard.
28.a	The maximum amount of waste that may be present at the Site at any one time shall not exceed the following: 595 tonnes of solid non-hazardous waste as described in Condition 25a above stored in the material handling building	See Section 2.0, above.		

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28b.	The maximum amount of waste that may be present at the Site at any one time shall not exceed the following: b. <i>Solid Residual Waste</i>	1. Complete <i>Waste Storage Area Verification Table</i> at end of this section		
28	The maximum amount of waste that may be present at the Site at any one time shall not exceed the following: c. <i>Liquid Industrial Waste</i> (designated storage locations include: Southern Ash Sump; Utility Sump; 450 m ³ AST; 15 m ³ Below Grade Storage Tank; Sewage Sump Pit; 160 m ³ AST; 4 x 70 m ³ ASTs)	1. Verify <i>liquid wastes</i> only stored in designated locations.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
30.	The Site shall be operated and maintained in a secure manner, such that unauthorized persons cannot enter the Site.	1. Visually verify condition of gates, property line and security fences	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
31.	A sign shall be posted and maintained at the main entrance/exit to the Site displaying in a manner that is clear and legible from the public roadway bordering the Site . The sign shall contain specified information.	1. Verify sign is present	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
34.	The Owner shall ensure that all waste storage containers at the Site have a label or sign identifying the waste type and when applicable the waste class(es), the waste characteristic, WHMIS and TDGA classification of the contents contained within. The label or sign shall be clearly visible for inspection and record keeping	1. Inspect waste storage containers for presence of appropriate labels.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Waste storage containers were labelled.
35.	All waste received at the Site shall be unloaded, processed and stored at the locations shown in the General Arrangement Drawing (Drawing Number 141-DL-0260).	1. Verify wastes stored in designated locations.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

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No.	Provisional Certificate of Approval (Waste Disposal Site) NUMBER 3166-6TYMDZ Term and Condition	Validation Method	Concerns Identified	Comments (for identified concerns)
36.	The Owner shall ensure that all waste and process chemicals shall be stored in accordance with Ministry publication "Guidelines for Environmental Protection Measures at Chemical Storage Facilities", dated May 2, 2007 or as amended. Wastes and process chemicals shall be segregated from other incompatible wastes and materials.	1. Verify wastes and process chemicals stored in designated locations and manner specified in DOM during site tour.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
39a	The Owner shall ensure that the doors of the material handling building shall be kept closed at all times and shall only be opened for entry or departure of vehicles (see CofA4315-8JVP3K, Term and Condition 4.(5)).	1. Verify doors closed.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
54	Spill Contingency and Emergency Response Plan shall be retained in a central location on the Site and accessible to all staff at all times.	1. Verify current version is available in central location.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Spill Contingency and Emergency Response Plans are kept in Control Room
55.	The equipment, materials and personnel requirements outlined in the Spill Contingency and Emergency Response Plan shall be immediately available on the Site at all times. The equipment shall be kept in a good state of repair and in a fully operational condition.	1. Verify specified spill response equipment and materials are available and in good condition.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

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Waste Storage Area Verification Table

(Provisional Certificate of Approval NUMBER 3166-6TYMDZ, Term and Conditions 28)

Waste Storage Area	Number Present	Approved Limit	Units	Within Approved Limit (*)	Waste Stored Only in Designated Buildings(*) (Verified by Inspection):	
					MSW Handling	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Incoming Non-hazardous Waste Stored					MSW Handling	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Slag Stored	0	10	10-tonne bins	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Ash Handling	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Non-hazardous Converter Ash Stored	0	6	10-tonne bins	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	MSW or Ash Handling	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Non-hazardous, Non-processable Waste Stored	0	1.5	10-tonne bins	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	MSW or Ash Handling	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Hazardous Baghouse Waste Stored	0 tonnes	30	Tonnes	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	MSW Handling	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Incidental Subject Waste	0 drums	10	Drums	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	MSW Handling	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
	0 wranglers	2	Wranglers			
Wranglers of Filter Material Stored	2 Wranglers	6	Wranglers	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	MSW Handling	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Spent Activated Carbon	0 tonnes	10	Tonnes	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	MSW Handling	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

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6.0 CERTIFICATION

This report reflects DCS Limited's best judgement in light of the information available to it at the time of preparation. Specifically, it is based on information supplied by site representatives, a sampling of facility files and a visual inspection of the property. DCS Limited has prepared this report using information understood to be factual and correct. DCS Limited staff are not employees of Plasco Trail Road Inc. This report is an overall review of the process and, as DCS staff are not intimate with plant operations on a day-to-day basis, it shall not be responsible for conditions arising from information or facts which were not fully disclosed to DCS staff by site representatives, or for conditions which can only be confirmed through sampling or monitoring.


This report was prepared by DCS Limited on behalf of Plasco Trail Road Inc. and the Ontario Ministry of the Environment. Any use of, or reliance or decision based on this report by any third party is the sole and exclusive responsibility of such third party. DCS accepts no responsibility for damages, if any, suffered by any third party as a result of the use of or reliance or decision based on this report.

We certify, based on the review of the above items, that Plasco Trail Road Inc. is in substantial compliance with Provisional Certificate of Approval (Waste Disposal Site) Number 3166-6TYMDZ and Certificate of Approval (Air) Number 4315-8JVP3K.

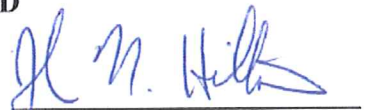
Yours very truly,

DECOMMISSIONING CONSULTING SERVICES LIMITED

Prepared By:


Troy Austrins, P.Eng.
Regional Engineer

Reviewed by:


John Hilton, M.A.Sc., P.Eng.
President

Date:

6 December 2011

