



REPORT

Environmental Management System and Community Engagement Report

Ruetgers Canada Inc.

Submitted to:

Ruetgers Canada Inc.

Submitted by:

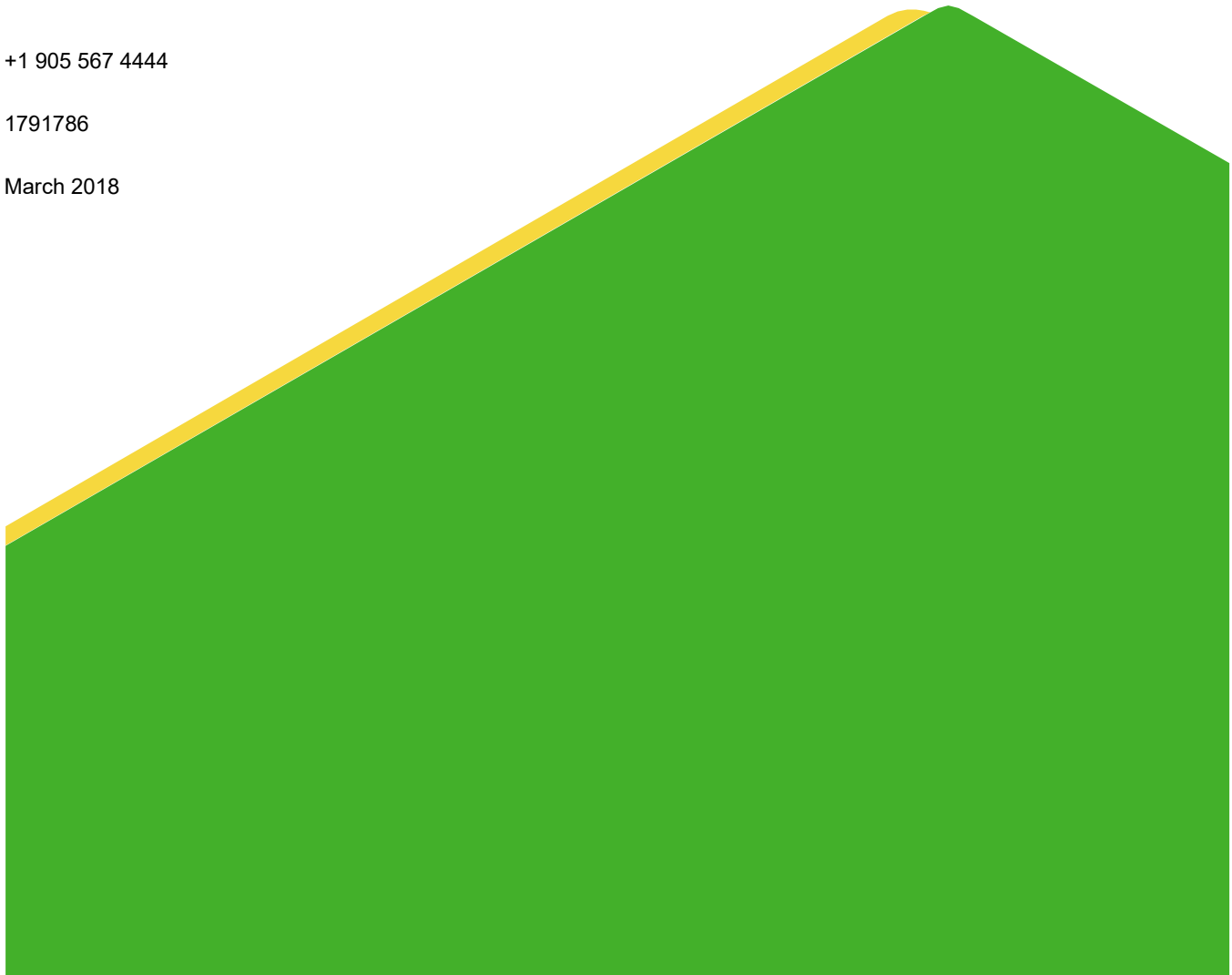
Golder Associates Ltd.

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1791786

March 2018



Distribution List

1 e-copy: Ruetgers Canada Inc.

1 e-copy: Golder Associates Ltd.

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1.0 INTRODUCTION

Ruetgers Canada Inc. (Ruetgers) operates a coal tar and petroleum-based material processing facility located at 725 Strathearne Avenue N. in Hamilton, Ontario (the Facility). Coal tar from various sources are blended, distilled and fractionated into six fractions, which include light oil, tar acid oil, naphthalene oil, wash oil, heavy aromatic oil and coal tar pitch. These products, which are shipped from the Facility by tanker truck and rail car, are essential basic materials for the following downstream industries: aluminum, graphite products, refractory, chemicals, construction, wood preservation and automotive. These basic materials are processed further by other industries to make industrial products such as carbon electrodes, concrete superplasticizers, carbon black pigment and pavement sealer.

The primary processes utilized at the Facility include coal tar receiving, storage, distillation, product storage and shipping, fume gathering and incineration, fume scrubbing, natural gas combustion and wastewater collection and treatment. The Ruetgers site spans 5 hectares and distills approximately 250,000 tonnes of tar annually.

1.1 Site-Specific Standards

Ruetgers submitted Site-Specific Standard (SSS) Applications to the Ontario Ministry of the Environment and Climate Change (MOECC) for benzene and benzo(a)pyrene [B(a)P] to demonstrate compliance with Ontario Regulation (O.Reg.) 419/05 while continuing to reduce emissions as much as possible with technology-based solutions and best practices. The SSS for benzene and B(a)P were approved on November 21, 2017 (Reference Number 7856-9VDPSR) as summarized in Table 1.

Table 1: Summary of Benzene and B(a)P Site-Specific Standards

Contaminant, CAS Number	Applicable Dates	Annual Site-Specific Standard [$\mu\text{g}/\text{m}^3$]
B(a)P, 50-32-8	November 21, 2017 – December 31, 2017	0.062
	January 1, 2018 – June 30, 2018	0.0613
	July 1, 2018 – Expiry Date	0.0008
Benzene, 71-43-2	November 21, 2017 – June 30, 2018	27.7
	July 1, 2018 – Expiry Date	12.7

The following sections associated with the Facility's SSS Orders require Ruetgers to prepare an Environmental Management System and Community Engagement Report (the Report) for each calendar year, commencing April 1, 2018:

- B(a)P: Item 3.2 in Order Number 202-17-order-rv0 issued November 21, 2017; and
- Benzene: Item 4.2 in Order Number 202-17-order-rv0 issued November 21, 2017.

This Report is intended to meet the requirements listed on the SSS Orders, including the following information with respect to the preceding calendar year:

- i) Documentation of all complaints received by the Company relating to air emissions and the resolution of those complaints;
- ii) A written summary of the actions taken each calendar year to implement the Action Plan for benzene and B(a)P, including a description of each action taken, the date of implementation of each action taken and dates for the implementation of actions yet to be taken; and
- iii) The minutes of the Environmental Monitoring Team (EMT) meetings held during the calendar year and any related follow-up actions.

Although not required until after April 1, 2018, this Report has been voluntarily prepared in advance to summarize the above items for the 2017 calendar year. The Report will be made available for public inspection at the Facility during office hours and on the Ruetgers website no later than March 31, 2018 and will also be presented at the next Environmental Monitoring Team meeting after that date.

2.0 ENVIRONMENTAL MANAGEMENT SYSTEM

Ruetgers is committed to the responsible management of its operations and products to ensure there is no unacceptable risk to employees, the public and the environment. They are committed to comply with all applicable environmental, legal and other requirements, including voluntary measures and air emission and wastewater limits. Ruetgers is dedicated to pollution prevention by minimizing the environmental impact of their operations and products through spill prevention measures and waste minimisation. They strive to continually improve environmental performance through maintaining an effective Environmental Management System (EMS).

2.1 Complaint Response Procedure

As part of their EMS, Ruetgers has implemented a complaints response procedure to record and resolve complaints received from the public. A summary of the complaints received in 2017 and the resolution of the complaints is provided in Appendix A – Documentation of Complaints.

2.2 Action Plans for B(a)P and Benzene

The Action Plans for B(a)P and benzene were submitted to the MOECC as part of the SSS Application in February 2016. Following review and discussions with the MOECC, the Action Plans for B(a)P and benzene were updated and resubmitted in September and November 2016, respectively. The SSS Approvals define the Action Plans as those “submitted by the Company as part of its Request, including but not limited to the items summarized in Appendix 1 of this Approval.” Appendix 1 of each SSS Approval includes further actions that were not included in the originally submitted Action Plans. The Action Plans detail the steps Ruetgers will take to reduce emissions of B(a)P and benzene. Steps taken in 2017 are documented in Appendix B – 2017 Written Summary of Implemented Process Improvement Actions for B(a)P and Benzene.

3.0 COMMUNITY ENGAGEMENT

Open and transparent communication with our community is very important to Ruetgers. Ruetgers is committed to an open exchange of information with stakeholders. As part of the SSS approval process, Ruetgers held various meetings to inform the public and key stakeholders about the steps being taken to reduce emissions and to demonstrate compliance with O.Reg. 419/05. Table 2 summarizes the meetings that have been held since 2015. As required by the SSS Orders, a copy of the meeting minutes and follow-up actions from the January 17, 2018 EMT meeting is provided in Appendix C.

Table 2: Summary of Community Engagement Meetings

Date	Meeting Description	Purpose
March 24, 2015	Ruetgers Employee Meeting	Discuss overview of the SSS application process, actions taken to reduce emissions and summary of information to be presented at March 30, 2015 Public Meeting.
March 25, 2015	Community Groups Meeting	Discuss overview of the SSS application process, actions taken to reduce emissions and summary of information to be presented at March 30, 2015 Public Meeting.
March 25, 2015	Local Neighbours and Businesses Meeting	Discuss overview of the SSS application process and good practices to following during the process.
March 30, 2015	Initial Site-Specific Standard Public Meeting	Drop-in format with display boards and representatives from Ruetgers and Golder available to answer questions and record comments regarding topics such as Facility operations, SSS Application process, and public feedback opportunities.
February 24, 2016	Site-Specific Standard Public Meeting	Drop-in format with display boards and representatives from Ruetgers, MOECC and Golder available to answer questions and record comments regarding topics such as Facility operations, SSS Application process and associated reports, maximum predicted concentrations for benzene and B(a)P, proposed Action Plan for benzene and B(a)P, and public feedback opportunities.
January 17, 2018	Initial Environmental Monitoring Team (EMT) Meeting	Discuss overview of Ruetgers operations, December 5, 2017 incident, purpose of EMT and proposed ambient monitoring plan.

4.0 CONCLUSION

This Report was prepared for the exclusive use of Ruetgers and is intended to fulfil MOECC reporting requirements for an EMS and Community Engagement Report as outlined in the SSS Orders. The contents of the Report are based on discussions with Ruetgers regarding Facility operations in 2017 and review of documentation provided by Ruetgers. Any changes in Facility conditions and operational practices completed subsequent to this period are not accounted for. Persons other than Ruetgers and the previously mentioned Ontario regulatory authorities using this document or the observations, conclusions or recommendations stated within, will do so at their own risk.

When evaluating the Facility and developing this Report, Golder has relied on information provided by Ruetgers and the regulatory authorities. Golder has acted in good faith and accepts no responsibility for any deficiencies, misstatements, or inaccuracies contained in this Written Summary resulting from omissions, misinterpretations or falsifications by those who provided Golder with information.

Golder prepared this Report using its commercially reasonable best efforts consistent with the level and skill ordinarily exercised by members of the profession currently practicing under similar conditions.

A site inspection and physical sampling of atmospheric emission sources were not completed as part of the scope of work.

Signature Page

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<https://golderassociates.sharepoint.com/sites/21499g/Deliverables/1 - EMT/EMT CE Report/Final/1791786-R-Rev0 29Mar2018 Ruetgers EMT CE Report.docx>

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APPENDIX A

Documentation of Complaints

DATE March 29, 2018

Project No. 1791786

DOCUMENTATION OF COMPLAINTS

In accordance with the Ruetgers Canada Inc. Site Specific Standard Order documents for benzo(a)pyrene and benzene, the annual Environmental Management System and Community Engagement Report must provide documentation of all complaints received by the Company relating to air emissions and the resolution of those complaints. The following is a summary of the complaints received in 2017.

Date of Complaint	Complaint	Complaint Resolution
Jun. 2, 2017	Coal tar pitch spill and vapour cloud emission	Matter remains under MOECC investigation
Sep. 20, 2017	Emissions from loading pitch to a railcar	Source of fugitive emissions was controlled by slowing down railcar loading rate. Call back was made to the neighbour.
Oct. 13, 2017	Coal tar pitch spill and vapour cloud emission	Matter remains under MOECC investigation
Oct. 30, 2017	Coal tar pitch spill and vapour cloud emission	Matter remains under MOECC investigation
Dec. 5, 2017	Coal tar pitch spill and vapour cloud emission	Matter remains under MOECC investigation

EKL/KL/FSC/ng

<https://golderassociates.sharepoint.com/sites/21499g/deliverables/1 - emt/emt ce report/app a - complaints/1791786-l-rev0 29mar028 ruetgers appendix a complaints.docx>

APPENDIX B

2017 Written Summary of
Implemented Process Improvement
Actions for B(a)P and Benzene



REPORT

Written Summary of Implemented Process Improvement Actions for Benzo(a)Pyrene and Benzene

As Required by Site-Specific Standard Approvals for Ruetgers Canada Inc.

Submitted to:

Ruetgers Canada Inc.

Submitted by:

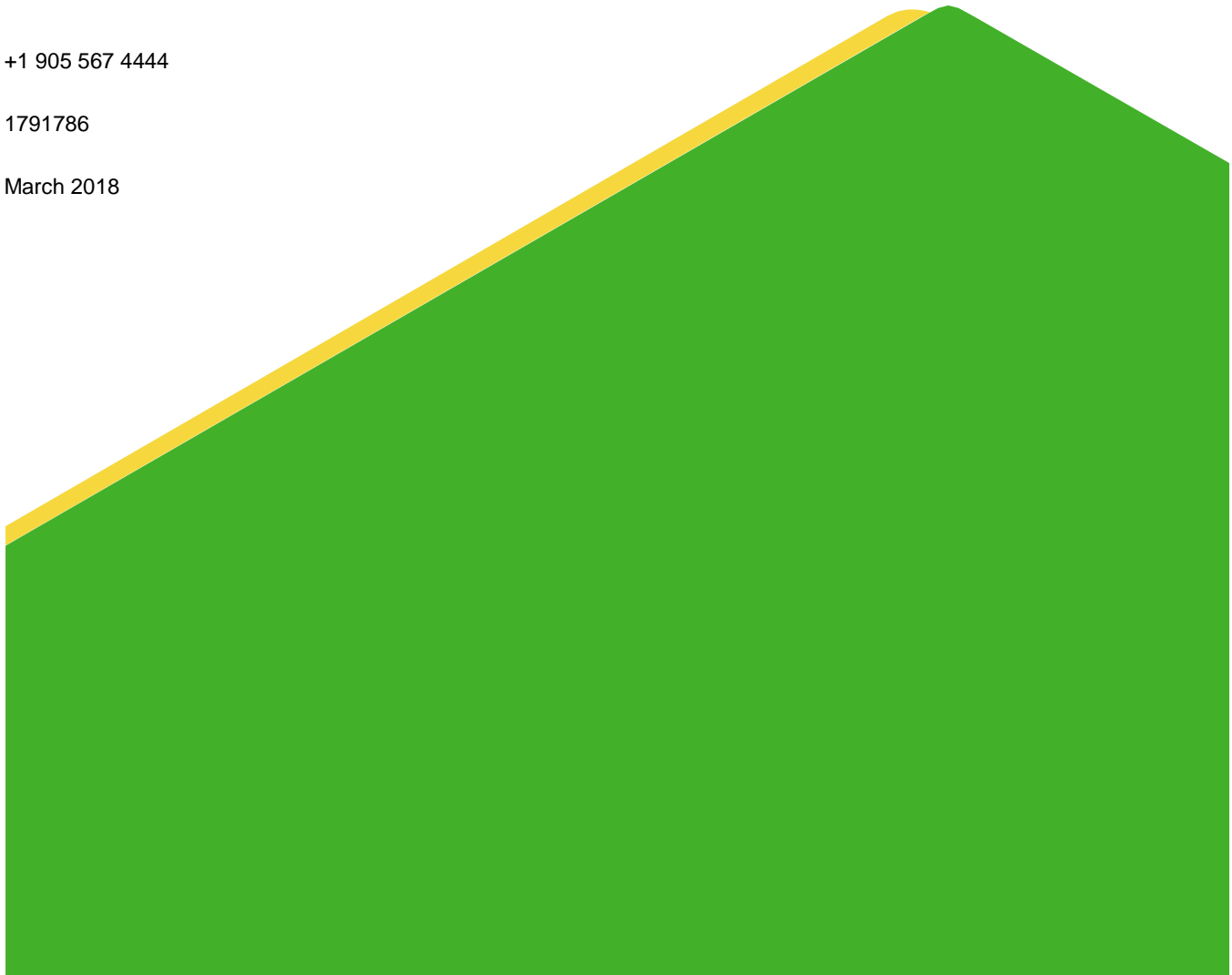
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1 e-copy: District Manager

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1.0 INTRODUCTION

Ruetgers Canada Inc. (Ruetgers) operates a coal tar and petroleum-based material processing facility located at 725 Strathearne Avenue N. in Hamilton, Ontario (the Facility). The Facility takes by-products from the steel manufacturing sector and produces high value products used in the aluminum, chemical, construction, pavement sealer and wood preservation industries.

Ruetgers has implemented an air emissions control program to reduce benzene and benzo(a)pyrene [B(a)P] emissions from the Facility since in the 1990's. This program was completed successfully in 2013, resulting in the reduction of benzene and B(a)P emissions by over 99% from historical levels. However, updates to the emission estimating calculation methods completed in 2014 and the introduction of the Ontario Ministry of the Environment and Climate Change (MOECC) annual standards for both benzene and B(a)P in 2016 required the Facility to submit Site-Specific Standard (SSS) Applications to demonstrate compliance with O. Reg. 419/05. The SSS Applications were submitted in February 2016. Updated documentation requested by the MOECC was submitted subsequently as needed (e.g., updated Action Plans).

The SSS for benzene and B(a)P were approved on November 21, 2017 (Reference Number 7856-9VDPSR) as summarized in Table 1.

Table 1: Summary of Benzene and B(a)P Site-Specific Standards

Contaminant, CAS Number	Applicable Dates	Annual Site-Specific Standard [$\mu\text{g}/\text{m}^3$]
B(a)P, 50-32-8	November 21, 2017 – December 31, 2017	0.062
	January 1, 2018 – June 30, 2018	0.0613
	July 1, 2018 – Expiry Date	0.0008
Benzene, 71-43-2	November 21, 2017 – June 30, 2018	27.7
	July 1, 2018 – Expiry Date	12.7

The following sections associated with the Facility's SSS Approvals or Orders require Ruetgers to prepare a Written Summary of the actions taken each calendar year to implement the Action Plans for B(a)P and benzene:

- B(a)P: Condition 5 in Site-Specific Standard Approval Number 201-17-rv0 issued November 21, 2017
- Benzene: Item 4.19 in Order Number 202-17-order-rv0 issued November 21, 2017

This Written Summary of the B(a)P and benzene Action Plans implementation summarizes the calendar years of 2016 and 2017. This Written Summary presents descriptions of each action taken, date of implementation of each action taken, and dates for the implementation of actions yet to be taken. This Written Summary was submitted electronically to the MOECC District Manager as well as the MOECC Standards Development Branch (SDB) Director by March 31, 2018.

2.0 B(A)P AND BENZENE ACTION PLANS AND IMPLEMENTATION

The Action Plans for B(a)P and benzene were submitted to the MOECC as part of the SSS Application in February 2016. Following review and discussions with the MOECC, the Action Plans for B(a)P and benzene were updated and resubmitted in September and November 2016, respectively. The SSS Approvals define the Action Plans as those “submitted by the Company as part of its Request, including but not limited to the items summarized in Appendix 1 of this Approval.” Appendix 1 of each SSS Approval includes further actions that were not included in the originally submitted Action Plans.

Section 2.1 – 2016 Calendar Year Implemented Actions summarizes the actions taken in 2016 based on the original Action Plans (February 2016). Section 2.2 – 2017 Calendar Year Implemented Actions summarizes the actions taken in 2017 based on both the originally submitted Action Plans (February 2016) and the actions listed in Appendix 1 of each SSS Approval (November 2017).

2.1 2016 Calendar Year Implemented Actions

In 2016, Ruetgers implemented several Process Improvement Actions that were approved in the B(a)P and benzene Action Plans. These actions focused on the product handling sources at the Facility, including tanker truck loading sources (LS2 and LS4) and rail car loading source (LS3). These actions are intended to improve the capture efficiency of the Fume Scrubbing System (FSS) as the Action Plans continue to be implemented. Details of the implemented actions, dates they were implemented in 2016, actions that have not been implemented yet and their planned implementation dates are summarized in Table 2.

Table 2: Summary of Process Improvement Actions Implemented in 2016 as Part of the B(a)P and Benzene Action Plans

Process Improvement Action	Source ID	Process Improvement Action Detail	Action Implemented in 2016?	Notes
B(A)P				
Sandvik Building – Dust Collector	PS19	90% Control Efficiency of Dust Collector	—	No upgrades made to Sandvik Unit flaking step; same dust collector efficiency at end 2016 as before. Source to be eliminated in Q3 2017.
Loading Building	VS6B	90% Control Efficiency of Enclosure	—	
Benzene				
LDAR Program	LS1, VS2, VS3, VS8	No action until 2017	—	—
B(a)P and Benzene				
Product Handling	LS2-LS4	98% FSS Capture Efficiency	—	Current FSS Capture Efficiency is 98%
■ Improve scrubber oil replenishment frequency, temperature control, & type	LS2-LS4	Lower viscosity scrubber oil now being used that allows for lower temperature of scrubber oil and improved fume condensing ability. Frequency of scrubber oil refresh now at one load every two months	Yes, Q1 and Q2 of 2016	—
■ Automate and improve draw of fumes	LS2-LS4	Complete engineering design	Yes, Q3 of 2016	Construction starting Q2 2017
■ Add new control system on pressure control TK-77 (exhaust drawn by TK-49)	LS2-LS4	Complete engineering design	Yes, Q3 of 2016	Construction starting Q2 2017
■ Reduce impact of post loading steam blowouts through use of orifice reducers	LS2-LS4	—	Yes, Q1 and Q2 of 2016	—
■ Design closure plate over dip rod hole	LS3	Engineer/design new loading arm with complete seal (Q3 2016)	No	Target completion is Q1 2018
		New design for enclosing dip rod enclosure was successful, however, complete RC loading seal was still an issue (Q3 2016)		Starting project in Q1 2017
		Plan to replace the entire loading arm assembly to ensure tight fitting enclosure can be guaranteed (Q3 2016)		First trial arm installation to be Spot 4 Track 1 in Q4 2017
		Replace loading arms (Q4 2016)		—
■ Improve seal on loading equipment	LS3	Engineer/design new loading arm with complete seal	No	Target completion is Q1 2018
		Several designs for new enclosure lid to trial		Trials were not as successful as hoped Q1 & Q2 2016

Process Improvement Action	Source ID	Process Improvement Action Detail	Action Implemented in 2016?	Notes
		Plan to replace the entire loading arm assembly to ensure tight fitting enclosure can be guaranteed		First trial arm installation to be Spot 4 Track 1 in Q4 2017
■ Improve seal on loading equipment	LS2, LS4	Engineer/design new sealing application on loading arm cone	No	—
		Install high temperature sealing rubber to ensure tight fitting enclosure can be guaranteed		
■ Improve seal on rinsing station	LS3	Preliminary Engineering design complete in Q1&Q2; Final design in Q4	Yes	To start fume hose improvements in Q2 2017
■ Improve seal on RC unloading stations	LS2-LS4	Preliminary Engineering design complete in Q1&Q2; Design trial was a success (1/4 spots complete); Install remaining unloading covers (4/4) in Q4	No	Completed trial seal on one spot. Others will be completed in Q2 2017
■ Update SOPs (BMPP) - throttle pumps without speed control upon startup	LS2-LS4	Review and optimize all variable speed drives (VSDs) on-site; this is an on-going process until all actions above are implemented. Design changes on loading arms will change how VSDs are programmed. As changes are made to throttling/VSDs, the SOPs will be altered accordingly. Changes will begin in September 2016 and will continue to March 2018.	No	Ongoing

2.2 2017 Calendar Year Implemented Actions

In 2017, Ruetgers implemented several Process Improvement Actions that were approved in the B(a)P and benzene Action Plans and included in the SSS Approvals. Ruetgers continued to focus on the actions related to product handling sources at the Facility, including tanker truck loading sources (LS2 and LS4) and the rail car loading source (LS3). These actions are intended to improve the capture efficiency of the FSS as the Action Plans continue to be implemented. Details of the implemented actions, dates they were implemented in 2017, actions that have not yet been implemented and their planned implementation dates are summarized in Table 3.

Table 3: Summary of Implemented Action Plan in 2017 for B(a)P and Benzene as per Site-Specific Standard Approvals

Action	Expected Date of Completion	Action Included in Action Plans	Action Implemented in 2017?	Notes
B(a)P				
Implement door closure practices on pitch flaking operation	Dec. 21, 2017	No	No - Unit was closed as of Aug. 10, 2017	—
Solid(flakes) Coal tar pitch production line closing	Oct. 1, 2017	Yes	Yes – Closed as of Aug. 10, 2017	—
Engineering Report of the FSS, including: <ul style="list-style-type: none"> ■ Engineering Calculations (mass, heat/energy balance) to clarify the system capacity and actual operating parameters, to determine whether or not the existing system has sufficient capacity to handle the volatile organic compounds (VOC) loading at the projected efficiency. ■ Engineering Calculations (mass, heat/energy balance) to clarify the system capacity to determine whether or not the existing system has sufficient capacity for additional VOCs loading. ■ To assess situations when the system is overwhelmed and excess vapours are not captured. ■ To determine additional methods that would be used to direct volatile organic compounds if the system capacity is not sufficient. To assess further methods to address system efficiency and optimize operations.	Dec. 31, 2018	No	N/A (2018 date of completion)	—
Benzene				
Fume Gathering and Incineration System (FGI): Install equipment, implement and maintain a program to continuously monitor and record the temperature, flow rate and residence time of the gaseous stream into the incineration system, as detailed in the steps below:	—	—	—	—
<ul style="list-style-type: none"> ■ Plan and arrange for necessary equipment 	Dec. 21, 2017	No	No (see interim solution in Notes section)	<ul style="list-style-type: none"> ■ Interim solution is to estimate gas stream flow rate and residence time along with known temperature by week of April 16 ■ Permanent solution is delayed due to complexity of finding appropriate equipment due to congested piping/ducting space. Working with a vendor. Need to conduct gas stream sampling to confirm technical feasibility of measuring equipment. Success of this approach avoids major existing equipment modifications and boiler shutdown. Timeline for installation/commissioning which follows gas stream sampling/testing, confirmation that the measuring equipment will work and delivery is week of June 4, 2018.
<ul style="list-style-type: none"> ■ Install the equipment 	Jan. 21, 2018	No	N/A (2018 date of completion)	
<ul style="list-style-type: none"> ■ Start to operate the installed equipment to continuously monitor and record the temperature, flow rate and residence time of the gaseous stream into the incineration system 	Feb. 21, 2018	No	N/A (2018 date of completion)	
Engineering Report of the FGI System, including: <ul style="list-style-type: none"> ■ Engineering Calculations (mass, heat/energy balance) to clarify the system capacity and actual operating parameters, to determine whether or not the existing system has sufficient capacity to handle the VOCs loading at the projected efficiency. ■ Engineering Calculations (mass, heat/energy balance) to clarify the system capacity to determine whether the existing system has sufficient capacity for additional VOCs loading. ■ To assess situations when the system is overwhelmed and excess vapours are not captured. ■ To determine additional methods that would be used to direct volatile organic compounds if the system capacity is not sufficient. To assess further methods to address system efficiency and optimize operations.	Dec. 31, 2018	No	N/A (2018 date of completion)	—

Action	Expected Date of Completion	Action Included in Action Plans	Action Implemented in 2017?	Notes
Engineering Report: Assess Wastewater Plant operations and options to increase benzene removal efficiency and decrease benzene emissions to the atmosphere.	Dec. 31, 2018	No	N/A (2018 date of completion)	—
B(a)P and Benzene				
Update and implement Standard Operating Procedures (SOP) for the Coal tar pitch production line	Dec. 21, 2017	No	No – Unit was closed as of Aug. 10, 2017	—
Improve cleaning practices at the Facility to minimize emissions	Dec. 21, 2017	No	No – Unit was closed as of Aug. 10, 2017	—
Fume Scrubbing System (FSS): <ul style="list-style-type: none"> ■ Increase frequency of adding new scrubber oil ■ Increase temperature control ■ Use appropriate quality scrubbing oil 	Dec. 21, 2017	Yes	Yes – Complete as of Q1-Q2 2016	—
Liquid (product) Coal tar pitch handling improvements:	—	—	—	—
<ul style="list-style-type: none"> ■ Improving seal on unloading stations 	Dec. 21, 2017	Yes	Yes – Complete as of Dec 20, 2017 for tar unloading; Mar 28, 2018 for pitch unloading	—
<ul style="list-style-type: none"> ■ Automate and improve draw of fumes 	Dec. 21, 2017	Yes	Yes – Complete as of Jan 20, 2018	Delay was due to the need to complete all equipment modifications before connecting/configuring to the process control system all at the same time.
<ul style="list-style-type: none"> ■ Add new control system to control pressure on tank TK-77 	Dec. 21, 2017	Yes	Yes – Complete as of Jan 20, 2018	Delay was due to the need to complete all equipment modifications before connecting/configuring to the process control system all at the same time.
<ul style="list-style-type: none"> ■ Improving seal on rinsing stations 	Dec. 21, 2017	Yes	Yes – Complete as of Jan 28, 2018	Delay was due the need for a new vacuum control arm.
<ul style="list-style-type: none"> ■ Improve seal on loading equipment for tanker trucks 	Jan. 1, 2018	Yes	Yes – Complete as of Mar. 16, 2018	—
<ul style="list-style-type: none"> ■ Replacing loading arms for rail cars 	Mar. 31, 2018	Yes	N/A (2018 date of completion)	First new loading arm commissioned Q4 2017 at Spot 4 Track 1; Second new arm installed Q1 2018 at Spot 6 Track 1 and to be commissioned; Other 6 arms are onsite; Target installation of remaining 6 arms by May 31, 2018.
<ul style="list-style-type: none"> ■ Update SOPs for ventilation, pumps 	Mar. 31, 2018	Yes	Yes – Complete as of Q4 2017 for completed equipment upgrades	Further updates to be completed once all equipment upgrades are in place.

2.2.1 LDAR Program

As part of the Action Plan for benzene submitted in November 2016, Ruetgers proposed to submit a LDAR plan to the MOECC for approval during the second quarter of 2017 and begin its implementation following its approval. As per the benzene Order, the LDAR plan (referred to as the Component Leak Survey Plan) does not require MOECC approval and its compliance date is April 1, 2018 (second quarter of 2018).

The LDAR program, as part of the benzene Order, includes the requirement of Component Identification, which has the compliance date of January 21, 2017 (two months after the benzene Order was issued). The Component Identification was prepared on January 21, 2018 and revised on March 16, 2018. Although not a requirement of the benzene Order, Ruetgers submitted the Component Identification to the MOECC, so that any recommendations could be incorporated into the document.

Ruetgers will provide the Director and District Manager with a summary of the dates on which the Component Leak Surveys are planned to take place in 2018. Ruetgers intends on implementing the first Component Leak Survey in April 2018 to meet the compliance date in the benzene Order.

3.0 CONCLUSION

This Written Summary was prepared for the exclusive use of Ruetgers and is intended to fulfil MOECC reporting requirements for a Written Summary as outlined in the B(a)P SSS Approval and benzene Order. The contents of the Written Summary are based on discussions with Ruetgers regarding Facility changes throughout 2016 and 2017 and review of documentation provided by Ruetgers. Any changes in Facility conditions and operational practices completed subsequent to this period are not accounted for. Persons other than Ruetgers and the previously mentioned Ontario regulatory authorities using this document or the observations, conclusions or recommendations stated within, will do so at their own risk.

When evaluating the Facility and developing this Written Summary, Golder has relied on information provided by Ruetgers and the regulatory authorities. Golder has acted in good faith and accepts no responsibility for any deficiencies, misstatements, or inaccuracies contained in this Written Summary resulting from omissions, misinterpretations or falsifications by those who provided Golder with information.

Golder prepared this Written Summary using its commercially reasonable best efforts consistent with the level and skill ordinarily exercised by members of the profession currently practicing under similar conditions.

A site inspection and physical sampling of atmospheric emission sources were not completed as part of the scope of work.

Signature Page

Golder Associates Ltd.



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APPENDIX C

**Environmental Monitoring Team
Minutes and Follow-up Actions**

First Ruetgers EMT Meeting

**January 17, 2018
6:00PM to 8:15PM
Hamilton Waterfront Trust Centre
(Multipurpose Room)
57 Discovery Drive
Hamilton, Ontario L8L 8K4**

Meeting Chair: Denis Corr

Attendees: See below

Attendees		
Gord Gilmet, Ruetgers	Denis Corr, Chair	Sean Capstick, Golder
Kyla Suchovs, Golder	Paul Widmeyer, MOECC	Lubna Hussain, MOECC
Cathy Grant, MOECC	Andy Sebestyen, Stelco	Jochen Bezner, Resident
Bob Weingartner, Resident	Lynda Lukasik, Environment Hamilton	Kathleen Livingston, Resident
Candy Vennier, Resident	Liz Tobin, Resident	Kat Bezner, Resident
Joanna Kadlubowska, Resident	Cathy McPherson, Resident	Susan Noakees, Resident

Meeting Notes

Welcome and Introductions

- Gord Gilmet welcomed everyone to the meeting, introduced himself, and provided an overview of the meeting agenda.
- Introductions were made around the room, with attendees noting their name and why they are interested in being part of the EMT.

RUETGERS - Who We Are and Why We Are Here

Gord Gilmet gave a presentation to provide an overview of Ruetgers Canada Inc. (Ruetgers), including the following topics:

- 1) Ruetgers Canada
- 2) Company evolution
- 3) Rain Carbon (global facilities, stats, value chain)
- 4) Product end use
- 5) Plant/facility overview
- 6) Community involvement

The presentation generated the following comments and questions:

- Kathleen Livingston inquired if Rain Carbon is a publically owned company. Gord Gilmet responded that Rain Carbon is not publicly owned, the company is privately owned.
- Lynda Lukasik requested Gord Gilmet provide an overview of what happens in each part of the plant, using the aerial imagery in the presentation to illustrate what happens and where. Gord Gilmet provided an overview, noting where the distillation units and pitch/product storage tanks are located. Gord Gilmet noted that as the product becomes more refined, the smaller the storage tank(s) for the material becomes. Gord Gilmet noted that once the products are tested and meet customer specifications, the product is loaded into railcars or trucks. The Ruetgers plant has eight railcar loading spots and three truck loading spots. Gord Gilmet noted that the majority of product is loaded into and transported off-site via railcar and tanker trucks.
- Jochen Bezner inquired if material comes into the Ruetgers plant via truck. Gord Gilmet responded that a lot of local material comes in via truck, and railcar is typically used for bringing in materials from non-local facilities (e.g. coal tar).
- Lynda Lukasik inquired where the coal tar comes from. Gord Gilmet noted that coal tar is brought in from local plants and also from just outside Pittsburgh, and operations in Alabama (Birmingham), Pennsylvania, and West Virginia. Gord Gilmet noted that coal tar can be brought to the Ruetgers plant via the waterway (i.e., slip 23/24), but this transportation method is less used as Essar Steel coal tar is not currently received.
- Lynda Lukasik asked what percentage of the coal tar comes from local plants and what percentage comes from elsewhere. Gord Gilmet noted he did not have the answer on hand, but noted he would look into it and provide the information at the next EMT meeting.
- Kat Bezner asked where the off-loading areas (i.e. for materials coming from other plants) are located within the plant, and once the material is in the plant, is the Ruetgers plant a closed system. Using the aerial imagery in the presentation, Gord Gilmet illustrated where the material off-loading areas are located and noted that once the material is at the Ruetgers plant the material is then transferred within the plant via pipes. To move the finished product from the plant's storage tanks into a tanker truck or railcar in the loading area, the awaiting truck/railcar will open a hatch located at the top of tanker/railcar and a loading line and vapour recovery line unit will be brought over and put directly onto the hatch and connect onto it. Once the connection has been securely made, the operator will signal that the product is ready to be pumped into the truck/railcar. Gord Gilmet noted that this transfer of product to the truck/railcar is one the most significant sources of benzo(a)pyrene that can be further controlled.
- Jochen Bezner inquired where the air that is in the truck/railcar goes once the air has been displaced with the product put in the truck/railcar. Gord Gilmet provided an overview of this process, specifically noting that loading line and vapour recovery line unit is attached to the top of the truck/railcar to take in the displaced air. Gord Gilmet noted that the seal of this loading line and vapour recovery line unit on the railcars (compared to the trucks) can be improved and therefore this is a key step in the Action Plan for benzo(a)pyrene.

- Kathleen Livingston asked for clarification regarding where the release of benzo(a)pyrene is coming from during the transfer of product from the storage tanks to the truck/railcar. Gord Gilmet noted that the leakage of benzo(a)pyrene is a result of the seal of the loading line and vapour recovery line unit not being perfect. Gord Gilmet noted that the loading line and vapour recovery line unit seal(s) is an area of improvement for the plant.
- Liz Tobin asked how Ruetgers' operations in Germany and Russia compare to the facility in Hamilton, specifically if these facilities have the same loading/unloading operations. Gord Gilmet noted that the operations in Germany and Russia differ from the Hamilton plant; however, the loading/unloading follows the same general principle/method. Liz Tobin noted she has seen a photo of a Ruetgers facility located in the middle of a residential area. Gord Gilmet noted that the facility in question is most likely Ruetgers' Germany site. Gord Gilmet noted that the Ruetgers Germany facility is larger than the Hamilton plant, and thus the plant processes in Germany are located right in the middle of the site and not as close to the fence line. Gord Gilmet noted that at Ruetgers Canada, the railcar loading facilities are very close to the site fence line.
- Kathleen Livingston asked if the Ruetgers Germany facility has the same leakage issue with the hose's seal on trucks/railcars as the Ruetgers Hamilton plant. Gord Gilmet noted he is not aware of the specific emission numbers from the Germany facility, nor whether that facility has the same leakage from loading line and vapour recovery line unit during product loading.
- Bob Weingartner noted that Gord Gilmet may be misrepresenting the information slightly when it was noted that the Ruetgers Germany facility has a different fence line and location of plant processes compared to the Hamilton plant. Bob Weingartner noted that just because the dispersion/dilution of emissions may differ between the Germany facility and the Hamilton plant because of the location of the fence line, the main issue remains that a chemical is still being released into the air. Bob Weingartner noted understanding of dilution principles by providing an example that dumping a chemical in a small pond would result in different dispersion and dilution compared to dumping that same amount of a chemical in a large lake; however, the main concern is that a chemical is still being "dumped". Gord Gilmet noted understanding, and reiterated that it was not his intent to compare the Germany and Hamilton facility's fence lines and use Hamilton's smaller plant size as a way to justify any emissions from the Hamilton plant.
- Ghosh Bobba inquired how Ruetgers is providing mitigation and protection from spills during the loading of product. In particular, Ghosh Bobba noted concern with potential spills onto the ground that could then result in surface water contamination. Gord Gilmet noted there are numerous mechanisms in place for spill control, such as automatic shut-offs, alert systems etc. so that spills don't occur. If a spill were to occur, Gord Gilmet noted that the loading area is covered in asphalt, which would prevent any spills from immediately contaminating surface water. Any spills would be dealt with in an appropriate manner.

December 5th Incident

Gord Gilmet provided an overview on an incident that took place at the Ruetgers Hamilton plant on December 5, 2017, noting that the incident was significant. The incident involved a spill of coal tar pitch, resulting in a large yellowish vapour cloud emission. Gord Gilmet apologized on behalf of Ruetgers Canada for the incident, noting that it was an accident. It was noted that some personnel working at the plant experienced some minor health effects from their brief exposure to the vapour cloud, and were transported to hospital as a precautionary measure, but were fine by the next day. It was noted that the leak of coal tar pitch was stopped within 10 minutes of the leak starting. Gord Gilmet noted that in addition to stopping the leak, Ruetgers priority was ensuring the health and safety of employees, contractors, and the plant's neighbours. Ruetgers has started down the path to make sure that such an incident does not happen again. Gord Gilmet noted that further details regarding the incident cannot be given at this time because the incident is being investigated by the Ministry of the Environment and Climate Change (MOECC).

The following comments and questions were discussed regarding this topic:

- Jochen Bezner inquired what the vapour cloud emission was comprised of. Gord Gilmet noted that the vapour cloud contained benzo(a)pyrene. Jochen Bezner inquired about the concentration of benzo(a)pyrene in the vapour cloud. Gord Gilmet did not provide the exact concentration, but noted that the concentration was significant.
- Kathleen Livingston shared a story regarding her father working in a facility and how that facility's operations at the time resulted in her father's passing, thus noting concern regarding employees' short and long term health, particularly as a result of this incident. Gord Gilmet noted that since the employees' exposure to the coal tar pitch was brief, the health effects to employees are minor and short term; therefore, long term health effects are not anticipated.
- Lynda Lukasik inquired whether spills are a recurring issue at the Ruetgers plant. Gord Gilmet noted that the spill that occurred on December 5, 2017 was the largest spill to take place at the plant in many years. It was noted that smaller spills do occasionally occur. Lynda Lukasik inquired whether smaller spills are reported to the MOECC. Gord Gilmet noted that if a small spill happens, and has the potential for off-site impacts, then the spill is reported to the MOECC.
- Jochen Bezner asked how many reported spills Ruetgers has had over the previous years. Gord Gilmet noted that over the past years approximately 12-15 spills have occurred in total.
- Jochen Bezner asked how spills are detected and captured, whether there were monitoring stations for spills, and whether Ruetgers has cameras installed. Gord Gilmet noted that all off-site spills are reported, no matter how small they are. In regards to cameras, Gord Gilmet noted that Ruetgers does have cameras, however, they are used primarily for security at this time, but are currently being upgraded so they can be used in a greater capacity.
- Jochen Bezner noted to the MOECC that sometimes the judgement of the company itself may not always be the most trustworthy in self-determination whether a spill has an off-site impact, thus determining whether or not the spill requires reporting to the MOECC.

- Paul Widmeyer from the MOECC commented that spill reporting is subjective, but reiterated that companies have a legal responsibility to report spills. Paul Widmeyer noted that in Ruetgers' case, any spills or incidents from the plant would usually have a visible emission.
- Denis Corr asked the MOECC how many spill reporting's have happened. Paul Widmeyer noted that there has been four spill reporting's since June 2017, but did not have the number of spill reporting's prior to that on hand; Paul Widmeyer noted he would provide this information at the next EMT meeting.
- Cathy McPherson asked the MOECC when the report regarding the Ruetgers December 5, 2017 incident would be available to the public. Paul Widmeyer offered to provide a list of all spill reports/records from Ruetgers for the next EMT meeting. Paul Widmeyer reiterated that details regarding the December 5, 2017 Ruetgers incident cannot be discussed in detail due to an ongoing investigation. If any details regarding the incident were shared, it could compromise the investigation.
- Cathy McPherson asked the MOECC when the investigation into the December 5, 2017 incident would be complete, and when a report of the incident would be available to the public. Paul Widmeyer noted that at this time an Order is publicly available, this Order was issued to Ruetgers, and the Order outlines what the company must do as a result of the incident. Paul Widmeyer noted that the Order includes that Ruetgers must hire an engineer to assess the plant (including plant procedures) and prepare a report outlining recommended changes. The engineer's report would be provided to Ruetgers and the MOECC, and if the MOECC approves of the report, then Ruetgers will have to implement any changes noted in the report. Ruetgers will have to implement the changes under supervision of an independent engineer.
- Joanna Kadlubowska asked about the timelines associated with the aforementioned Order and resulting engineer's report and implementation of changes. Paul Widmeyer noted July 10, 2018 is the deadline on the Order.
- Joanna Kadlubowska noted reading in a news report that some people were sent to the hospital as a result of the Ruetgers incident. Gord Gilmet confirmed that six people went to the hospital; five people were contractors, one was an employee. Gord Gilmet noted that these people were taken to hospital as a precautionary measure, and five of the people were released from hospital that same day, the remaining person was released from hospital the following day.
- Joanna Kadlubowska asked if the Ministry of Labor was involved, and whether all personnel were wearing appropriate Personal Protective Equipment (PPE). Gord Gilmet noted that the Ministry of Labor was involved. Gord Gilmet noted he could not comment on whether personnel were wearing appropriate PPE due to the ongoing investigation.
- Kathleen Livingston asked if details regarding the other three events (i.e. not including the December 5, 2017 incident) could be provided for the next EMT meeting. Paul Widmeyer committed to providing the materials via email following the meeting.
- Kathleen Livingston requested reports for all incidents for the past 24-month period. Jochen Bezner added a request for the Order(s) to be provided via email as well. Paul Widmeyer noted that both reports for the past 24-month period, and the Order(s) would be provided.

- Kat Bezner asked for clarification regarding the difference between exceedances, incident reporting and event reporting. Paul Widmeyer clarified that an exceedance is from an Environmental Compliance Approval (ECA), under section 15 of the *Environmental Protection Act*. Paul Widmeyer noted that an incident is synonymous with an event, and these differ from an exceedance. Provincial legislation requires all people (i.e., companies and general members of the public) to report spills, which can be either liquid spills or releases to the environment.
- Kathleen Livingston noted that there are seven months between the December 5, 2017 incident and the filing of the report to the MOECC (i.e., July, 2018), and asked the MOECC why this is the case. Paul Widmeyer noted that July 2018 is the final compliance date of the Order; however, there are interim compliance deadlines that must be met in the time up to July. Kathleen Livingston asked for confirmation in the understanding that Ruetgers will have to be in full compliance by July 2018. Paul Widmeyer noted this understanding is accurate, and further added the Ruetgers is required to report monthly to the MOECC on progress being made. Gord Gilmet added that information regarding the Order and efforts and progress made towards compliance will be provided to the EMT.
- Lynda Lukasik asked the MOECC to confirm the definition of a spill (i.e., that requires reporting under the *Environmental Protection Act*). Paul Widmeyer noted that as per the *Environmental Protection Act*, “spill”, when used with reference to a pollutant, means discharge: (a) into the natural environment; (b) from or out of a structure, vehicle or other container; and, (c) that is abnormal in quality or quantity in light of all circumstances of the discharge.

Environmental Monitoring Team (EMT)

Sean Capstick (Golder) provided an overview of the EMT, referring to a hardcopy of the draft EMT Terms of Reference that was provided at the meeting. Sean noted that the EMT will serve as a forum for open discussion between Ruetgers, members of the community, and the MOECC, regarding environmental issues pertaining to the operation of the Ruetgers plant. In addition, it was noted that the establishment of the EMT would satisfy conditions outlined in two Orders issued by the MOECC (i.e. Order Number 201-17-order-rv0 and 202-17-order-rv0). Sean Capstick discussed the draft Terms of Reference, including contact, purpose, objectives, membership, meetings, reporting, and review of the terms of reference.

The following questions and comments were discussed regarding the EMT and the Terms of Reference:

- Jochen Bezner inquired where the “EMT” name came from, noting that he is aware of Community Liaison Committees (CLC) that appear to serve a similar purpose as the EMT. Lubna Hussain and Cathy Grant from the MOECC noted that the “EMT” name came from other similar groups in Northern Ontario and other industries. The MOECC noted that “EMT” and “CLC” are interchangeable/synonymous. However, the MOECC noted the intent that the EMT will review more data, whereas CLC meetings are typically more information sessions. The MOECC noted that while data may be reviewed by the EMT, a scientific background is not required to be a member of the Ruetgers EMT.
- Denis Corr noted that the EMT is required to meet quarterly. Denis Corr proposed to all meeting attendees that subsequent EMT meetings be held on a Wednesday, between 6 p.m. to 8 p.m. Attendees were unanimous in agreeing that Wednesday’s between 6 p.m. to 8 p.m. was suitable.

- Denis Corr asked all meeting attendees whether the location (i.e., Hamilton Waterfront Trust Centre) was a suitable location for subsequently held EMT meetings. Attendees unanimously agreed that EMT meetings could be held at the Hamilton Waterfront Trust Centre, contingent on venue availability.
- Sean Capstick noted that as per the draft Terms of Reference, EMT meeting invites would be sent out at least one-month prior to the meeting, and a proposed meeting agenda would be provided to EMT members at least one-week prior to the meeting. Denis Corr proposed that an “other business” item be added to the agenda for subsequent EMT meetings. Sean Capstick and Gord Gilmet noted agreement; “other business” will be added as an item on future meeting agendas.
- Denis Corr asked all meeting attendees whether anyone had any objections to him (i.e. Denis Corr) continuing to Chair the EMT meetings. As outlined in the draft Terms of Reference, Denis Corr noted that as Chair, he would facilitate the meetings so that the meetings are conducted in an efficient, professional and collaborative manner. Though retained by Ruetgers, Denis Corr reiterated that as Chair he would be independent and provide impartial support. Meeting attendees noted no objection(s) and it was agreed that Denis Corr would remain as Chair for subsequent EMT meetings.
- Kathleen Livingston noted that when she has attended other Ministry meetings, often the “other business” item is utilized by the Ministry to provide other communications, that in her experience, tended to be off-topic not relevant to the meeting. As such, Kathleen Livingston inquired whether the proposed “other business” on the agenda would be utilized in this manner, and if so, noted that she would not want to participate in said meeting. Denis Corr noted agreement that any topics discussed during the “other business” agenda item would be kept relevant to the topic/EMT. Denis Corr referred to the draft Terms of Reference and noted that he has been retained by Ruetgers as an independent facilitator for the EMT meetings and he would make sure that EMT meetings would remain relevant/on topic.
- In response to Kathleen Livingston’s comment, Paul Widmeyer noted that the EMT meetings are not the Ministry’s meetings, but are Ruetgers’ meetings, and as such, the MOECC will not be presenting at EMT meetings unless invited by the EMT.
- Lynda Lukasik noted that Ruetgers may wish to review other company’s EMT/CLC Terms of Reference documents to see how the draft Ruetgers EMT Terms of Reference compares. Lynda Lukasik referenced a couple of company’s Terms of References and offered to provide copies to Ruetgers. Sean Capstick thanked Lynda Lukasik for the offer, and requested she email him (i.e., Sean Capstick) the Terms of Reference. Sean Capstick provided Lynda Lukasik with his contact information following the meeting.
- Kathleen Livingston inquired whether food would be provided for EMT meetings, specifically noting that the meeting timeframe from 6 p.m. to 8 p.m. can make it difficult to have a meal beforehand. Denis Corr noted that food will be provided for all EMT meetings, and asked that any dietary restrictions be noted by attendees when they RSVP to meetings so that food can be provided accordingly.

Proposed Monitoring Plan

Sean Capstick (Golder) gave a presentation to provide an overview of the proposed monitoring plan for the Ruetgers plant, which included the following topics:

- 1) Hamilton air monitoring network
- 2) Annual wind trends (2015-2016)
- 3) Hamilton industry B(a)P emissions to air (2000-2013)
- 4) Hamilton industry Benzene emissions to air (1994-2013)
- 5) Modelled concentrations at the fence line
- 6) Comparison of modelling and monitoring results at closest sensitive receptor
- 7) Average concentrations (2009-2017)
- 8) 2009-2017 monitoring data - B(a)P and Benzene
- 9) Sampling equipment – high volume samplers and summa canister

The presentation generated the following comments and questions:

- In regards to the Hamilton air monitoring network, Denis Corr added that the monitoring information is available to the public at real time online. (<http://newreporting.hamnair.ca/>)
- In regards to the modelled concentrations at the fence line, Cathy McPherson inquired whether it would be useful to have concentrations/modelling information for along the waterfront. Sean Capstick noted that for all the sensitive receptors in the community, the concentration decreases with distance, and this is predicted by dispersion models. Therefore, dispersion models have information regarding concentrations along the waterfront.
- Lynda Lukasik inquired whether impacts to wildlife and the environment are considered in the Standards, in addition to human health. Sean Capstick noted that the Standard is set for human health or the environment. Denis Corr added that the Standards are important, but so are the limiting times (i.e. 24 hours, 1-year, etc.). Denis Corr noted that decades ago the Standards were typically determined based primarily on what was practical for industries to adhere to, with human health effects being secondary. Denis Corr noted that presently the MOECC disregards what is practical/feasible. Standards are for industries and the Standards are set based solely on what is best for human health or the environment, whichever is lower.
- Joanna Kadlubowska asked whether the beachfront community would have a higher concentration of benzene compared to other communities, specifically noting that the beachfront community is where most of the wind from around the Ruetgers plant would be pushing to. Sean Capstick noted that the concentration of benzene is not higher in the beachfront community. Joanna Kadlubowska inquired whether the Queen Elizabeth Way (QEW) was a source of benzene. Sean Capstick noted that the modelling results are only for the Ruetgers plant and do not include any potential emissions from the QEW.
- Ghosh Bobba inquired whether monitoring is undertaken seasonally. Sean Capstick noted that the presentation includes annual monitoring data, however, monitoring takes place at other timelines, such as 24-hour every 12 days.

- Denis Corr added that the monitoring methods are traceable back to the National Institute of Standards and Technology in the U.S. Denis Corr noted that the MOECC audits these monitoring networks and the MOECC Auditors have no problem failing any network that fails to meet monitoring requirements.
- Ghosh Bobba noted understanding that air samples are collected, but asked Sean Capstick whether snow was also being collected. Ghosh Bobba noted the strong relationship between air quality and snow, and noting that when the snow starts melting it will become run-off (i.e., surface water) and thus any potential impacts to the snow would ultimately result in an impact to the watershed. Sean Capstick noted that snow collection is not currently being undertaken, nor is it required as part of the monitoring.
- Lynda Lukasik noted that the Order outlines timelines, and that some of the dates have since passed. Lynda Lukasik inquired whether Ruetgers achieved the deadline outlined in Appendix I of the Order. Gord Gilmet stated that the actions with dates that have past have been completed. The timing for the monitoring is set out in the Order and in the Standard are all contingent on the approval of the monitoring plan. Gord Gilmet noted that the monitoring plan would be submitted to the MOECC for approval the following week (i.e., the week of January 22, 2018). Gord Gilmet further added that once the monitoring is approved, equipment will be procured, and then the monitoring will be in place. The overall timeline will commence when the monitoring plan is submitted/approved.
- Jochen Bezner noted disappointment with Ruetgers not having the Site Specific Standard in place for July 1, 2016, while other industries in Hamilton met the Standard deadline. Jochen Bezner further added that the delay in obtaining a Site Specific Standard may be a result of poor quality submissions, noting though that he cannot be certain that is the cause. Jochen Bezner noted that 16-months have passed since the phase in date for the Schedule 3 Standards, Jochen Bezner noted that even though Ruetgers did not have a Site Specific Standard during this period, there have been no repercussions for this, and thus noted his belief that Ruetgers has been taking advantage of this. Jochen Bezner noted his disappointment in the Site Specific Standard process and in Ruetgers, reiterating that other industries met the deadline and didn't receive the 16-month "extension" that Ruetgers has had, and there has been no negative consequences or repercussions to Ruetgers for taking this "extension". Gord Gilmet noted that improvements have been made during this 16-month timeframe, in advance of the formal Site Specific Standard approval.

Closing Remarks

Denis Corr inquired whether there were any additional items to be discussed prior to closing the meeting. The following additional items were discussed:

- Cathy Grant provided meeting attendees with a hand-out regarding an MOECC proposal pertaining to cumulative effects, noting that the Ministry is considering a cumulative effects assessment, and is seeking comments on the Environmental Bill of Rights (EBR) Registry online. The deadline for comments was February 7, 2018.

- In light of the amount of documents that require distribution to EMT members (e.g., presentations given at the meeting, supplementary Ruetgers and MOECC documents, the Terms of Reference, etc.), Sean Capstick proposed that Golder set up an external SharePoint site to be used as a library/repository for all documentation. Kyla Suchovs noted that the use of a SharePoint site may be advantageous in that not only would all documents be located and organized in one location, but also that given the file size of many documents/presentations, sending them by email may not be feasible. Kyla Suchovs added that the SharePoint site would be accessible only by EMT members, and proposed that EMT members would be notified via email when new documents were uploaded to the SharePoint site. Denis Corr asked meeting attendees whether they were in favour of the proposed SharePoint site. Meeting attendees unanimously agreed that the SharePoint site would be beneficial and supported its development/use. Kyla Suchovs noted that the Ruetgers EMT SharePoint site would be set-up following the meeting, and invitations to the site would be sent to meeting attendees via email. In addition, Kyla Suchovs reiterated that the Terms of Reference is in draft form, and thus input on the draft document would be required before finalization. A deadline for comments on the draft Terms of Reference would be provided in the email sent with the SharePoint information. Denis Corr added it is the hope that a Terms of Reference document can be agreed upon and finalized by the next EMT meeting, and reminded meeting attendees that those who would like to be officially be members of the Ruetgers EMT would be asked to sign the final Terms of Reference.

Denis Corr thanked everyone for attending the EMT meeting and encouraged everyone to attend the next EMT meeting to be scheduled in approximately April/May, 2018.

TECHNICAL MEMORANDUM**DATE** March 29, 2018**PROJECT** 1791786**TO** Ruetgers Canada Inc.**FROM** Golder Associates Ltd.**JANUARY 17, 2018 EMT MEETING FOLLOW-UP ACTIONS**

- Lynda Lukasik asked what percentage of the coal tar comes from local plants and what percentage comes from elsewhere. *Gord Gilmet noted he did not have the answer on hand, but noted he would look into it and provide the information at the next EMT meeting.*
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