

April 2026 – Third Party Independent Audit Durham York Energy Centre

Operations Phase Audit – 2025

EA file no. 04-EA-02-08

ECA no. 7306-8FDKNX

Prepared for
Regional Municipality of Durham and Regional Municipality of York

Malroz File: 795-126.00

Audit Site Walkthrough
April 7, 2026

Prepared by:




David Carnegie, P.Eng.
Auditor / Project Manager

Audit Completion
April 29, 2026


Ryan Gillan, B.Eng.
Assistant Auditor / Project Scientist

Distribution:

1 copy + 1 pdf – Region of Durham
1 copy – Malroz Engineering Inc.

NOTICE TO READER

This report summarizes the results of the 2025 Operations Audit of the Durham York Energy Centre undertaken by Malroz Engineering Inc. Audit work was undertaken during the month of April 2026, following completion of annual reporting by Reworld and the Regional municipalities of Durham and York (the Regions). Key audit dates are noted on the signed title page of this Audit Report.

Malroz was retained by the Regions to perform this audit. The data evaluations reported herein were completed in a manner which is consistent with the level of care and skill normally exercised by other members of the engineering and geoscience professions currently practising under similar conditions, subject to the time, financial, and physical constraints applicable to these services.

The findings reported in this document are based on the tasks completed by Malroz. Professional judgement, experience with similar work, and available data collected within the scope of work form the basis for this report. Malroz has prepared this report using information understood to be factual and correct. This undertaking cannot be relied upon to detect information or facts that were inaccurate, concealed, or not fully disclosed at the time of our work beyond what is reported herein. No guarantees are either expressed or implied.

Environmental conditions can be expected to change over time. The findings and conclusions of this report are valid only at the time at which this work was conducted. If future work is undertaken, or new information becomes available, Malroz should be so advised in order to re-evaluate the conclusions of this report and make any necessary modifications.

This document has been prepared by Malroz for the sole use of The Regional Municipality of Durham and The Regional Municipality of York, to evaluate compliance with respect to requirements set forth in regulations and permitting. Unauthorized reuse of this document for any other purpose, or by third parties, without the express written consent of Malroz, shall be at such party's sole risk without liability to Malroz.

Data, tables, charts, graphs, and interpretive illustrations presented in this document can only be properly evaluated when reviewed together with the accompanying report. Reference to this report should only be made to the full, intact document.

This notice to reader is an integral part of the accompanying report and must remain with it at all times.

Respectfully Submitted,

Malroz Engineering Inc.

TABLE OF CONTENTS

1.0	Introduction.....	1
1.1	Audit Scope.....	1
2.0	Audit Activities & Attendance.....	2
2.1	Site Walkthrough.....	2
2.2	Documents Review	4
2.3	Personnel Interviews.....	5
3.0	Findings and Recommendations	6
3.1	Previous Audit Findings	6
3.2	Current Audit Findings – Site Walkthrough	14
3.3	Current Audit Findings – Document Review	15
3.4	Current Audit Findings – Personnel Interviews	18
4.0	Conclusions.....	19

APPENDICES

Appendix A	Figures Figure 1 – Site Location Plan Figure 2 – Site Plan
Appendix B	Audit Plan
Appendix C	Audit Summary Checklists Table C1 Environmental Compliance Approval (ECA) Audit Table Table C2 Environmental Assessment Approval (EA) Audit Table
Appendix D	Site Walkthrough Photos
Appendix E	Documents Available on the Project Website
Appendix F	Third Party Audit Legislative Review

1.0 Introduction

The Ministry of the Environment Conservation and Parks (MECP) approved the construction of a mass burn incinerator (the Durham-York Energy Centre) in Clarington, in 2010, following the completion of an Environment Assessment Approval (EA).

The DYEC is located at 1835 Energy Drive, in the Municipality of Clarington. The 12-hectare parcel is situated north of the Courtice Water Pollution Control Plant in the Regional Municipality of Durham (see Figure 1, Appendix A).

The Durham-York Energy Centre (DYEC) is presently licensed to process up to 140,000 tonnes of post-diversion residual waste annually, and to recover metals and energy through this process. We understand that the DYEC has submitted an Environmental Compliance Approval (ECA) amendment request to the MECP that would permit the DYEC to process up to 160,000 tonnes per year; however, has not received approval for this expanded capacity at the time of reporting.

1.1 Audit Scope

Condition 16 of the Notice of Approval to Proceed with the Undertaking, granted on October 21, 2010, and passed by Order in Council on November 3, 2010, mandates that third party audits be completed. Further, the audit plan is to be approved by the Regional Director prior to implementation. Approval of the Operations Phase Audit Plan was received on October 24, 2013. The audit scope includes:

- 1) Confirmation that the operations at the Site are undertaken in accordance with the requirements of the EA, ECA, and regulatory requirements.
- 2) A review of the monitoring and testing results required by the ECA (formerly Certificate of Approval).
- 3) A review of any complaints received about the operation of the Facility.
- 4) A review of recommendations for improving the operation of the Facility received from the Advisory Committee.
- 5) Recommendations for any improvements to ensure that facility operations are compliant and protective of human health and safety and the environment.
- 6) Observations made during walkthrough of the site.

In addition to the foregoing scope items, Malroz reviewed the 2024 Operations Phase Audit, dated April 29, 2025, for items requiring follow up.

An Audit Plan for the 2025 Operations Phase Third Party Audit was submitted to the Regions on February 27, 2026 and approved on April 7, 2026, see Appendix B.

This audit report addresses the 2025 operations period and was completed, in part, during a one day site walkthrough conducted on April 7, 2026. The summary checklists used to address the requirements of the EA and ECA, with auditors' notes made during

the audit site walkthrough, document review, and personnel interviews are attached in Tables C1 and C2 of Appendix C for reference.

Findings of the Durham York Energy Centre (DYEC) audit are summarized in the following sections of this audit report.

2.0 Audit Activities & Attendance

The audit activities included a site walkthrough, review of documents and data at the DYEC, on the DYEC website, and made available electronically by DYEC staff to the audit team.

The Malroz audit personnel consisted of David Carnegie, M.Sc., MBA, P.Eng (auditor), and Ryan Gillan, B.Eng. (assistant auditor).

Personnel from the owners (the Regional Municipality of Durham or Durham Region and the Regional Municipality of York or York Region), and operator/constructor (Reworld, formerly Covanta) supported audit activities. Durham Region was represented by O'Neil Wright, Polycarp Ehidihamhen, Nicia Williams and Lipika Saha, York Region was represented by Muneeb Farid, and Reworld was represented by Supreet Kaur and Nicole Victor.

2.1 Site Walkthrough

Malroz audit personnel attended the DYEC site on April 7, 2026 to complete the site walkthrough component of the audit. Prior to entering the site, Malroz personnel conducted an initial drive and walk around the perimeter of the DYEC site from approximately 0745 to 0815 hours. The weather was cloudy with periods of overcast, and the prevailing wind was from the northwest.

A walkthrough of interior and exterior areas of the facility was completed by Malroz, accompanied by owner and operator personnel. The walkthrough included a review of documentation in the Scale House and Operations Centre (see Figure 2). Photo documentation collected during the site walkthrough is included in Appendix D. Summary notes collected during the walkthrough are provided in the audit summary checklists (Appendix C).

Supreet Kaur from Reworld led the site walkthrough, which began in the Region's boardroom at approximately 1100 hours. The site walkthrough was divided into two portions, the interior of the facility and the exterior of the facility.

The interior portion of the site walkthrough proceeded from the administration building through the Reworld operations centre, to the control room, then followed the order of operations from receipt of waste (Tipping Building) to the separation of metals from ash (Grizzly Building).

The following locations were observed during the interior portion of the walkthrough:

- The Control Room and the operating system;
- The Tipping Building, Tipping Floor, and Refuse Pit;
- The Feed Stoker Room;
- The Turbine Hall;
- Reverse Osmosis Area;
- The Grizzly Building; and
- The Air pollution control (APC) system and AMESA systems.

The exterior portion of the site walkthrough commenced at approximately 1300 hours. The following locations were observed during the exterior portion of the walkthrough:

- The eastern and western storm water management ponds, associated monitoring wells, and spill kits;
- The Scale House;
- The ammonia tank and associated secondary containment;
- The Pozzolan and cement silos;
- An above ground storage tank (AST) containing diesel fuel;
- The Residue Building;
- A diesel generator;
- Compressed gas cylinder storage;
- Signage at the entrance to the site, near the Scale House, outside of the Tipping Building, and various road signs; and
- Trees and fencing along the perimeter of the site.

Multiple operators in the Control Room were interviewed regarding the process for waste sorting and other job functions. Staff were interviewed regarding training and availability of SOPs. Hard copies of the SOPs were available within the Control Room and it was explained that all SOPs are available digitally on the Reworld GFILearn server. Reworld staff demonstrated the procedure for accessing the digital SOPs. The CEM and AMESA systems were observed to be in working order with one CO₂ calibration alarm observed on the Control Room digital display for boiler #1. Reworld staff explained that this alarm was due to the startup of the boiler. No other active alarms were observed in the Control Room.

At the conclusion of the site walkthrough, a wrap up discussion was held with the personnel attending the audit to review general observations and comments of the audit team.

Findings from the site walkthrough are presented in Section 3.2, Table 2.

2.2 Documents Review

Approval and operations documentation was reviewed during the April 7, 2026 site walkthrough, prior to the site walkthrough, and remotely during the weeks following the site walkthrough (see Appendix C for Summary Audit Checklists). Document review included:

- review of the monitoring and testing results, and associated reporting, required by the ECA (formerly Certificate of Approval) and EA;
- review of any complaints received about the operation of the Facility; and
- review of recommendations for improving the operation of the Facility received from the Energy from Waste Advisory Committee (EFWAC).

Onsite documents were reviewed within the Region Boardroom, the Control Room, and the Scale House. Documents available through the Reworld GFiLearn digital library were also reviewed on-site. Personnel from the Region and Reworld participated in the document review to facilitate production of documents requested by the auditors.

During the review, documents listed on the checklist were identified as available on the website, available through the shared drive provided by the Regions and Reworld, or maintained on site.

2.2.1 ECA and EA Associated Reporting

The ECA and EA list documents which are required to be maintained on the DYEC website (<http://www.durhamyorkwaste.ca>). A summary of these documents is provided in the web document checklist (see Appendix E).

Findings from the document review are presented in Section 3.3, Table 3.

2.2.2 Complaints

Individual complaints were available online through the DYEC website – 2 complaints were logged during the 2025 Operations audit period.

The complaints were received through email and telephone and were summarized as follows:

- A phone call received on September 8, 2025, reportedly related to observation of a burning plastic odour near the intersection of Highway 401 and Liberty Street in Bowmanville. DYEC staff confirmed no waste processing activities were occurring as the boilers were offline due to a scheduled maintenance

shutdown occurring from September 1 to September 14, furthermore, it was determined that the facility was located downwind at the time of the complaint. Based upon this information, it was concluded that the odour was unlikely to be associated with DYEC operations. Further discussion regarding this complaint is provided in Section 6 and Appendix 3 of the 2025 Odour Management and Mitigation Monitoring Report (covering DYEC operations encompassing November 1, 2024, to October 31, 2025).

- An email was received on December 15, 2025, regarding the proposed facility throughput increase to 160,000 tonnes and related concerns regarding ambient air quality after consumer-grade air quality sensor data was reportedly shared on social media. DYEC staff noted that the facility continuous emission monitoring system was operational and did not report spikes or unusual readings during the period in question and the DYEC was operating within permit limits. Furthermore, the ambient air monitoring station data upwind and downwind of the DYEC were reviewed and no alarms were triggered for pollutants or particulate matter.

Based upon our review of the complaint logs for the foregoing items, no further action was required by the DYEC staff.

2.2.3 Energy from Waste Advisory Committee Meetings

The Energy from Waste Advisory committee agenda for the June 27, 2025 meeting (Meeting #22) was available and reviewed. DYEC staff explained that the minutes for this meeting would be made available following approval at the next committee meeting.

During the June 27, 2025 meeting, the DYEC responded to questions posed by the committee regarding the 2024 Annual Compliance Report. The following updates were scheduled to be discussed:

- Automated Cart Pilot
- Multi-residential Organics Program

No further updates were scheduled to be discussed and the next meeting was set for June 26, 2026.

2.3 Personnel Interviews

In keeping with previous audits, personnel interviews were conducted during the document review, site walkthrough, and audit wrap-up meeting.

Facility personnel were interviewed about operating procedures and observations. Interviews included requests for further information and/or clarifications during the document reviews and site walkthrough. Interviews included cross-referencing information between the Regions' and Reworld's offices for consistency.

Findings from the personnel interviews are presented in Section 3.4.

3.0 Findings and Recommendations

Section 16 of the Notice of Approval to Proceed with the Undertaking dated October 21, 2010, and passed by Order of Council on November 3, 2010, mandates that third party audits be completed annually. This audit reports on the 2025 Operations Period.

The audit comprised three parts: document review, site walkthrough, and interviews. The components of this audit were completed during March and April, 2026.

3.1 Previous Audit Findings

Audit findings identified as “open” in the 2024 Operations Audit are summarized in Table 1, an update on the status at the time of the 2025 audit is also provided.

Table 1: Previous Audit Findings

Item #	2024 Operations Audit Findings	2025 Operations Audit Status
1	ECA 8(15) – requires visual screening in accordance with documentation in “Schedule A”. Although the visual screening is in place, sign off for landscaping remains outstanding from the Municipality of Clarington because some of the trees have not remained viable for the minimum required time period. Records and interviews with DYEC staff indicate 406 trees were planted by Trees for Life in 2024. These trees were observed during the site walkthrough. At the time of the 2024 operations audit, Clarington has not signed off on the landscaping plan implementation.	Clarington has signed off on the landscaping plan implementation based on email correspondence dated May 29, 2025, between DYEC and Clarington staff. Trees were observed during the site walkthrough (see photo 4). This finding is closed.
2	ECA 8(12) The Owner shall: (a) take all practical steps to prevent the escape of litter from the Site; (b) pick up litter around the Site on a daily basis, or more frequently if necessary; and (c) if necessary, erect litter fences around the areas causing a litter problem. Windblown litter was observed within the Site grounds and along the perimeter fencing during the site walkthrough. It was not clear whether the source of the litter was the DYEC or surrounding properties. Potential illegal dumping was observed along the gatehouse access road – within the section that is publicly accessible.	Windblown litter was observed within the Site grounds during the site walkthrough (see photo 7); it is not clear whether the source of the litter was the DYEC or contractor operations. However, it appeared that the amount of litter observed had decreased compared to the 2024 operations audit. DYEC staff noted that monthly “Power Hour” litter collection walkthroughs have resumed. Continue to implement the following processes and procedures to reduce the visible accumulation of litter: • Regular housekeeping to collect windblown litter. • The Outside Environmental Checklist completed daily includes a section to evaluate for the presence of “Odour/ Dust/ Litter” around the Site. • The Equipment Operator Daily Rounds includes a section for cleaning up litter observed outside the east and west Tipping Floor bay doors. • Monthly “Power Hour” walkthroughs where Reworld Staff collect windblown litter. This finding remains open.

Item #	2024 Operations Audit Findings	2025 Operations Audit Status
3	Housekeeping items such as debris and other materials/tools were observed within the ammonia tank secondary containment and near the ammonia tank walkways.	Debris and other materials were observed within the ammonia tank secondary containment during the site walkthrough (see photos 8-9). We recommend that the Outside Environmental Checklist include a section for noting debris clean-up within the ammonia secondary containment (e.g. a checkbox and a timestamp) similar to the Equipment Operator Daily Rounds checklist, to document when debris is removed. This finding remains open.
4	Contractor waste and materials were observed stored outside near the wastewater settling basin.	Contractor waste and materials from a recent outage were observed outside near the wastewater settling basin (see photos 11 and 13). We recommend that materials are stored in an orderly manner and that waste material is contained and disposed of in a timely manner. This finding remains open.
5	Compressed air cylinders were observed stored outside of protective storage cages near the Grizzly Building. Reworld staff reported that the cylinders are related to contractor activities during the recent outage.	Compressed gas cylinders were observed to be secured in protective cages when not in use (see photo 12). This finding is closed.
6	The door to Pozzolan silo was observed to be open.	The door to Pozzolan silo was observed to be closed (see photo 16). This finding is closed.
7	Miscellaneous items (e.g. an empty wooden skid) were observed in a walkway within the Boiler Building.	We observed a reduction in miscellaneous items stacked beneath process equipment and within walkways. Continue to make efforts to ensure that equipment and materials are stored in an orderly manner and do not pose a tripping hazard or limit access to operational equipment in the event that maintenance is required, or a spill occurs. This finding is closed.

Item #	2024 Operations Audit Findings	2025 Operations Audit Status
8	ECA 8(2) The Owner shall ensure that the entrance and exit doors into the Tipping Building, the Residue Building and the Grizzly Building are kept closed at all times except to permit the entry or exit of the respective waste transport vehicles and waste handling equipment into and out of these Buildings. ECA 8(3) The Owner shall ensure that, at all times, the air from the Tipping Building, the Residue Building, the Grizzly Building and from the Equipment is exhausted through an appropriate and fully functional APC Equipment approved by this Certificate Door #136 found ajar and appeared damaged in the Grizzly Building.	Door #136 in the Grizzly Building was observed closed, however, appeared to remain damaged (e.g. would not latch) during the site walkthrough (see photo 17). We recommend that doors to restricted areas are kept closed and functional. This finding remains open.
9	ECA 3(7) The Owner shall ensure that access to the Site, with the exception of the area designated as a Public Information Centre, is regulated and that no unauthorized persons are permitted at the Site without the Trained Personnel escort. Scale House personnel reported that drivers of vehicles not containing waste (e.g. couriers, deliveries of process materials) frequently drive past the Scale House without stopping to sign in.	Scale House personnel continue to report that drivers of vehicles not containing waste (e.g. couriers, deliveries of process materials) frequently drive past the Scale House without stopping to sign in during operating hours. The fence and gate providing access to the Scale House laneway is reportedly closed and secured during non-operating hours. Although we understand that the delivery drivers are generally recognized and repeatedly visit the facility, consideration should be given to the procedure for receiving deliveries and sign in and sign out procedures to provide greater control over access to the Site. We observed increased control of the Site during the site walkthrough as the Scale House and Control Room staff open/close the gate as vehicles approach and leave the Site. Additionally, DYEC staff met with the Regions' sign shop to develop and implement additional Site traffic signage to further enhance site entrance/exit controls. This finding remains open.

Item #	2024 Operations Audit Findings	2025 Operations Audit Status
10	ECA 3(1) Prior to receipt of Waste at the Site, the Owner shall ensure that a sign is posted at the entrance to the Site. The sign shall be visible from the main road leading to the Site. The following information shall be included on the sign: (a) name of the Owner; (b) this Certificate number; (c) hours during which the Site is open; (d) waste types that are approved to be accepted at the Site; (e) Owner's telephone number to which complaints may be directed; (f) Owner's twenty-four hour emergency telephone number (if different from above); (g) a warning against unauthorized access; and (h) a warning against dumping at the Site. Vegetation in the garden was observed to be partially obstructing the south side of the signage posted near the Visitor Centre parking.	Vegetation in the garden was observed to be partially obstructing the south side of the signage posted near the Visitor Centre parking (see photo 3). We recommend trimming and maintaining the vegetation to ensure that the vegetation is not obscuring the text on the sign. This finding remains open.
11	Ruts from vehicles and related ponding of water were observed within landscaped areas.	Ruts from vehicles and related ponding of water were observed during the site walkthrough within landscaped areas (see photos 18-19). DYEC staff reported that during scheduled outages, there is insufficient parking areas for contractor vehicles. As a best practice, vehicles should be kept off landscaped areas, and areas of rutting should be repaired for housekeeping purposes and to ensure that site runoff and infiltration are performing as intended. This finding remains open.
12	Contractors were observed to be parking on landscaped (grass) surfaces.	Contractors were not observed to be parked on landscaped surfaces during the site walkthrough. This finding is closed.

Item #	2024 Operations Audit Findings	2025 Operations Audit Status
13	ECA 8(2) The Owner shall ensure that the entrance and exit doors into the Tipping Building, the Residue Building and the Grizzly Building are kept closed at all times except to permit the entry or exit of the respective waste transport vehicles and waste handling equipment into and out of these Buildings ECA 8(3) The Owner shall ensure that, at all times, the air from the Tipping Building, the Residue Building, the Grizzly Building and from the Equipment is exhausted through an appropriate and fully functional APC Equipment approved by this Certificate. Entrance/exit person doors were observed to be ajar in the Residue Building and Tipping Floor.	The eastern person door to the Tipping floor was observed to be ajar (see photo 14). Residue Building doors were observed to be closed during the site walkthrough. We recommend that doors to restricted areas are kept closed and functional. This finding remains open.
14	Scale House personnel were observed to be parked in cross hatched areas near the Scale House.	Scale House personnel were observed to be parked in cross hatched areas near the Scale House during the site walkthrough (see photos 20-21). The traffic flow did not appear to be affected by the parked vehicles during the site walkthrough, however, as a best practice we recommend that DYEC staff park in approved areas to ensure that signage is not obstructed. This finding remains open.
15	Compressed air cylinders were observed stored outside without a protective storage cage near the Turbine Hall.	These compressed air cylinders were observed stored outside without a protective storage cage near the Turbine Hall during the site walkthrough (see photo 27). We recommend that compressed gas cylinders are secured in protective cages when not in use, or appropriately disposed of if no longer serviceable. This finding remains open.

16	A “no parking fire route” sign north of the Tipping Building was observed to be knocked over during the site walkthrough.	This sign was observed to be knocked over during the site walkthrough (see photo 22). As a best practice, we recommend that signage be maintained to serve its intended purpose. This finding remains open.
17	ECA 3(6) The Owner shall ensure that the Site is fenced in and that all entrances are secured by lockable gates to restrict access only to authorized personnel when the Site is not open. ECA 3(7) The Owner shall ensure that access to the Site, with the exception of the area designated as a Public Information Centre, is regulated and that no unauthorized persons are permitted at the Site without the Trained Personnel escort. The pedestrian gate latch near the Visitor Centre was observed to be propped open with rocks, preventing the gate from latching and locking.	No rocks were observed within the gate latch during the site walkthrough, however the latch still was not operating as intended (i.e. not locking once closed, see photo 23). Reworld staff noted that the gate latch was scheduled to be repaired. Ensure that gates are lockable and are locked when the facility is closed to ensure that only authorized personnel have access to the Site and to ensure that access during open hours remains well regulated. This finding remains open.
18	A water leak was observed and was leaking onto the floor within the Boiler Building.	This water leak was not observed during the site walkthrough. Continue to ensure that when water leaks occur, that they are contained and corrective maintenance is undertaken. This finding is closed.
19	Miscellaneous items (e.g. plastic water bottles, bolts, hoses etc.) scattered around the Boiler building.	We observed a reduction in miscellaneous items (e.g. plastic water bottles, bolts, hoses etc.) within the Boiler building. Continue to make efforts to ensure equipment and materials are stored in an orderly manner and do not pose a tripping hazard or limit access to operational equipment in the event that maintenance is required or a spill occurs. Ensure that waste material is collected and placed in designated bins, and disposed of appropriately. This finding is closed.

20 A cordoned off area was observed within the Boiler Building and contained a bin full of ash-water slurry. This mixture was also observed on the floor and in the drainage trench. Reworld staff explained that this observation was related to recent scheduled Site outage maintenance and that it was in the process of being cleaned-up.

A different cordoned off area was observed under one of the boilers during the site walkthrough (see photo 24). DYEC explained riddlings were escaping due to a damaged bar. The riddlings appeared to be mixed with water on the floor and in the drainage trench. DYEC reported that the issue was being worked on.

Ensure that equipment is maintained to perform as intended and that waste is collected and disposed of appropriately in a timely manner.

This finding remains open.

21 ECA 7(2) The Owner shall select, test and install appropriate CEM Systems and continuous recording devices in accordance with the requirements outlined in the attached Schedule "F" to conduct and maintain a program to continuously monitor, as a minimum, the following parameters prior to commencement of operation of the Boilers:

- (a) the temperature at one (1) second downstream of the combustion zone of each Boiler where most of the combustion has been completed and the combustion temperature is fully developed;
- (b) the inlet temperature of the gases into each baghouse of the APC Equipment of each Boiler;
- (c) the concentration of carbon monoxide, oxygen and organic matter (as methane) in the Undiluted Gases leaving the combustion zone via the economizer outlet of each Boiler;
- (d) the opacity and moisture content of the flue gas and the concentration of oxygen, nitrogen oxides, sulphur dioxide, hydrogen chloride, hydrogen fluoride and ammonia in the Undiluted Gases leaving the baghouse of the APC Equipment of each Boiler.

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

The 2025 Annual Operations Report states that the analyzer availability target (95%) was met during each quarter, within each boiler.

This finding is closed.

Section 5.2 of the 2024 Annual Operations Report states that the quarter 1 analyzer availability target (95%) was not met for three parameters (SO₂, NO_x and THC) on boiler 1 due to operational issues.

The analyzer availability target was met or exceeded during quarters 2 through 4.

3.2 Current Audit Findings – Site Walkthrough

There were no areas of non-compliance identified during the site walkthrough for the 2025 audit. Five (5) opportunities for improvement were identified and are summarized in Table 2 based on the interior portion of the walkthrough. New opportunities for improvement were not observed during the exterior portion of the walkthrough.

Table 2: Current Audit Findings – Site Walkthrough

Item #	2025 Operations Audit Findings	Requirement	Recommendation
Interior – Site Walkthrough			
1	Riddlings were observed under an inferred damaged conveyor in the Grizzly Building (see photos 25-26).	Good practice	Ensure equipment is operating as intended. Ensure that any material from the treatment process is collected and placed in the designated area and disposed of appropriately.
2	Compressed air cylinders were observed stored on dollies within the Boiler Building (see photo 28).	Good practice	We recommend that compressed gas cylinders are secured in protective cages when not in use.
3	An interior rubber curtain observed at the base of a combustion chamber in the Boiler Building was not completely affixed to its intended operating position. (see photo 29).	Good practice	Based on discussion with maintenance personnel we understand that a workorder has been issued for this issue and corrective maintenance is scheduled.

Item #	2025 Operations Audit Findings	Requirement	Recommendation
4	Pails of grease were observed outside the maintenance room without secondary containment (see photo 30).	Good practice	Generally, the storage of drums and pails included secondary containment elsewhere within the facility. Ensure that pails and drums continue to be stored on secondary containment with sufficient capacity as outlined by the MECP and where possible limit stacking of pails to reduce the risk of tips and spills. See Section 3.0 in the MECP Guidelines for environmental protection measures at chemical and waste storage facilities. https://www.ontario.ca/page/guidelines-environmental-protection-measures-chemical-and-waste-storage-facilities
Exterior – Site Walkthrough			
5	An upper storey Boiler Room door was observed to be ajar (see photo 31).	Good practice	Although the upper storey Boiler Room door is not one of the doors that are outlined in the ECA that are required to be closed, and there is no ground level access to the door, efforts should be made to ensure that doors related to process areas are kept closed and functional.

Item #	2025 Operations Audit Findings	Requirement	Recommendation
		complaint/Emission Event. As a minimum, the investigation shall include the following: (i) determination of the activities being undertaken at the Site at the time of the complaint/Emission Event; (ii) meteorological conditions including, but not limited to the ambient temperature, approximate wind speed and its direction. (iii) determination if the complaint is attributed to activities being undertaken at the Site and if so, the possible cause(s) of the complaint/Emission Event; and (iv) determination of the remedial action(s) to address the cause(s) of the Complaint/Emission Event, and the schedule for the implementation of the necessary remedial action(s). ECA 10(2)(c) The Owner shall respond to the complainant, if known, and the response shall include the results of the investigation of the Complaint, the action(s) taken or planned to be taken to address the cause(s) of the Complaint, and if any follow-up response(s) will be provided. (d) Upon completed investigation of the Complaint/Emission event, the Owner shall, within three (3) business days, submit a report to the District Manager on the Complaint, on the action(s) taken or planned to be taken to address the cause(s) of the Complaint and on all proposed action(s) to prevent recurrence of the Complaint/Emission Event in the future.	outlined in Section 10 of the ECA "Complaints/Odour-Contaminant Emissions Response Procedure".

not report spikes or unusual readings during the period in question and the DYEC was operating within permit limits. Furthermore, the ambient air monitoring station data upwind and downwind of the DYEC were reviewed and no alarms were triggered for pollutants or particulate matter. The complainant received an email on December 18, 2025 summarizing the results of the investigation. This response was submitted to the MECP on December 19, 2025 as a reporting of the conclusion of the complaint investigation. It is our understanding that the MECP was satisfied with the investigation into the complaint, and no additional control measures were necessary.

4.0 Conclusions

In the opinion of the auditors, operations at the Facility during the 2025 period were undertaken in substantial accordance with the requirements of the EA, and the ECA (formerly called a Certificate of Approval), and regulatory requirements.

Appendix A

Figures

Appendix B

Audit Plan

April 8, 2026:

Time	Task
0830-1200	Site tour (areas that require additional attention)
1200-1230	Lunch
1230-1530	Contingency for additional site observation, document review & interviews
1530-1600	Auditor preparation for closing meeting
1600-1630	Audit site visit closeout meeting & preliminary summary of findings

5.0 Closing

Please indicate your approval to proceed with the Audit Plan by returning one signed copy of this document to our office.

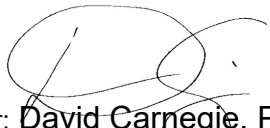
Please contact the undersigned if you have any questions, or concerns with respect to this document, or our approach to the work.

Yours truly,

MALROZ ENGINEERING INC.

DYEC Authorization to Proceed:

Nicia Williams


per: David Carnegie, P.Eng.
Project Manager

Signature of Signing Authority

Name / Title

Date

Appendix C

Audit Summary Checklists

Appendix D

Site Walkthrough Photos

