Ontario

Ministry of the Environment

Ministère de l'Environnement

Visioneering Corp.
35 Oak Street
Toronto, Ontario
M9N 1A1

Site Location: 35 Oak Street
Toronto City, Municipality Of Metropolitan Toronto
M9N 1A1

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

Description Section

A commercial lighting fixtures from steel and aluminum manufacturing facility, consisting of the following processes and support units:

- presses and punches;
- welding operations;
- parts washing;
- powder and spray painting;
- drying and curing ovens;
- natural gas fired heat cleaning oven;

including the Equipment and any other ancillary and support processes and activities, operating at a Facility Production Limit of up to 18,182,200 kilograms of steel consumed per year, exhausting to the atmosphere as described in the ESDM Report.

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

1. "Acoustic Assessment Report" means the report, prepared in accordance with Publication NPC-233 and Appendix A of the Basic Comprehensive User Guide, by Church and Trought Inc. and dated February 2008 submitted in support of the application, that documents all sources of noise emissions and Noise Control Measures present at the Facility and includes all up-dated Acoustic Assessment Reports as required by the Documentation Requirements conditions of this Certificate to demonstrate continued compliance with the Performance Limits following the implementation of any Modification.

2. "Acoustic Assessment Summary Table" means a table prepared in accordance with the Basic Comprehensive User Guide summarising the results of the Acoustic Assessment Report, up-dated as required by the Documentation Requirements conditions of this Certificate.

3. “Air Standards Manager” means the Manager, Human Toxicology and Air Standards Section, Standards Development Branch, or any other person who represents and carries out the duties of the Manager, Human Toxicology and Air Standards Section, Standards Development Branch, as those duties relate to the conditions of this Certificate.


5. "Certificate" means this entire certificate of approval document, issued in accordance with section 9 of the EPA and includes all the Schedules, and the Supporting Documentation.

6. "Company" means Visioneering Corporation operating as Visioneering Corporation that is responsible for the
construction or operation of the Facility and includes any successors and assigns.

7. "Compound of Concern" means a contaminant that, based on generally available information, may be emitted to the atmosphere in a quantity from any source at the Facility that is significant either in comparison to the relevant Ministry Point of Impingement Limit or if a Ministry Point of Impingement Limit is not available for the compound then, based on generally available toxicological information, the compound has the potential to cause an adverse effect as defined by the EPA at a Point of Impingement.

8. "Description Section" means the section on page one of the Certificate describing the Company's operations and the Equipment located at the Facility and specifying the Facility Production Limit for the Facility.

9. "Director" means any person appointed in writing by the Minister of the Environment pursuant to section 5 of the EPA as a Director for the purposes of section 9 of the EPA.

10. "District Manager" means the District Manager of the appropriate local district office of the Ministry, where the Facility is geographically located.

11. "Emission Summary Table" means the table prepared in accordance with O. Reg. 419/05 and the Procedure Document listing the appropriate Point of Impingement concentrations of each Compound of Concern from the Facility and providing comparison to the corresponding Ministry Point of Impingement Limit or Maximum Concentration Level Assessment.


14. "Equipment" means equipment or processes described in the ESDM Report, this Certificate and in the Supporting Documentation referred to herein and any other equipment or processes.

15. "Equipment with Specific Operational Limits" means heat cleaning oven or any Equipment related to the thermal oxidation of waste or waste derived fuels, fume incinerators or any other Equipment that is specifically referenced in any published Ministry document that outlines specific operational guidance that must be considered by the Director in issuing of a Certificate of Approval.

16. "ESDM Report" means the Emission Summary and Dispersion Modelling Report prepared in accordance with the Procedure Document by Kathleen Hearn (Church & Trought Inc.) and dated June 19, 2006 submitted in support of the application, and includes any amendments to the ESDM Report listed in Schedule A and all up-dated ESDM Reports prepared as required by the Documentation Requirements conditions of this Certificate.

17. "Facility" means the entire operation located on the property where the Equipment is located.

18. "Facility Production Limit" means the production limit placed on the main product(s) or raw materials used by the Facility that represents the design capacity of the Facility and assists in the definition of the operations approved by the Director.

19. "Log" means the up-to-date log that is used to track all Modifications to the Facility since the date of this Certificate as required by the Documentation Requirements conditions of this Certificate.

20. "Maximum Concentration Level Assessment" means the Maximum Concentration Level Assessment for the purposes of a Basic Comprehensive Certificate of Approval, described in the Basic Comprehensive User Guide, prepared by a Toxicologist using currently available toxicological information, that demonstrates that the concentration at any Point of Impingement for a Compound of Concern that does not have a Ministry Point of Impingement Limit is not likely to cause an adverse effect as defined by the EPA. The concentration at Point of Impingement for a Compound of Concern must be calculated in accordance with O. Reg. 419/05.

21. "Ministry" means the ministry of the government of Ontario responsible for the EPA and includes all officials, employees or other persons acting on its behalf.

22. “Ministry Point of Impingement Limit” means the appropriate Standard from Schedule 1, 2 or 3 from O. Reg. 419/05 and if a standard is not provided for a Contaminant of Concern the appropriate criteria listed in the Ministry publication
titled “Summary of O. Reg. 419/05 Standards and Point of Impingement Guidelines and Ambient Air Quality Criteria (AAQCs)”, dated December 2005, as amended.

23. "Modification" means any construction, alteration, extension or replacement of any plant, structure, equipment, apparatus, mechanism or thing, or alteration of a process or rate of production at the Facility that may discharge or alter the rate or manner of discharge of a Compound of Concern to the atmosphere or discharge or alter noise or vibration emissions from the Facility.

24. "Noise Control Measures" means measures to reduce the noise emissions from the Facility and/or Equipment including, but not limited to, silencers, acoustic louvres, enclosures, absorptive treatment, plenums and barriers.

25. "O. Reg. 419/05" means the Ontario Regulation 419/05, Air Pollution – Local Air Quality.

26. "Operating Envelope" means the limits on the Company's approved operations set out in Conditions 2.3 to 2.7 of this Certificate.

27. "Performance Limits" means the performance limits specified in the section of this Certificate titled Performance Limits.

28. "Point of Impingement" means any point outside the facility in the natural environment and as defined by s.2 of O. Reg. 419/05.

29. "Point of Reception" means Point of Reception as defined by Publication NPC-205 and/or Publication NPC-232, as applicable.


31. "Processes with Significant Environmental Aspects" means the Equipment which, during regular operation or if not properly operated or maintained, may cause or are likely to cause an adverse effect.


35. "Publication NPC-233" means the Ministry Publication NPC-233, "Information to be Submitted for Approval of Stationary Sources of Sound", October, 1995 as amended.

36. "Schedules" means the following schedules attached to the Certificate and forming part of the Certificate namely:

   Schedule A - Supporting Documentation;

37. "Supporting Documentation" means the documents listed in Schedule A of this Certificate which forms part of this Certificate.

38. "Toxicologist" means a qualified professional currently active in the field of risk assessment, risk management and toxicology that has a combination of formal university education, training and experience necessary to assess the Compound of Concern in question.

39. "Written Summary" means the written summary that must be submitted annually to the Ministry as required by the Section titled Reporting Requirements of this Certificate.

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

1. GENERAL

1.1 Except as otherwise provided by this Certificate, the Facility shall be designed, developed, built, operated and maintained in accordance with the terms and conditions of this Certificate and in accordance with the application, the ESDM Report, the Acoustic Assessment Report, plans, specifications and Supporting Documentation submitted and the following Schedules attached hereto:

Schedule A - Supporting Documentation

2. OPERATIONAL FLEXIBILITY

2.1 The Company may make Modifications to the Facility in accordance with this Certificate.

2.2 Despite Condition 2.1, all Modifications made by the Company shall be within the Operating Envelope of the Facility as defined by conditions 2.3 to 2.7.

2.3 Despite Condition 2.1, the Company shall not make Modifications to the Facility that are outside the scope of the intended operations of the Facility as described in the Description Section.

2.4 Despite Condition 2.1, the Company shall not make Modifications to the Facility that result in an increase of the Facility Production Limit above the level specified in this Certificate.

2.5 Despite Condition 2.1, the Company shall not make Modifications to the Facility that would add any Equipment with Specific Operational Limits. The Company shall operate Equipment with Specific Operational Limits approved by this Certificate in accordance with the original ESDM Report and Condition 10 in the Certificate.

2.6 Despite Condition 2.1, the Company shall only make Modifications to the Facility which comply with the Performance Limits.

2.7 Despite Condition 2.1, the Company shall not make Modifications to the Facility if the Modifications would be subject to the Environmental Assessment Act.

2.8 Condition 2.1 of this Certificate shall expire five (5) years from the date of this Certificate, unless this Certificate is revoked prior to this date. Upon expiry of Condition 2.1 of this Certificate, the Company shall apply for amendment to include the current ESDM Report and the current Acoustic Assessment Report in Schedule A as Supporting Documentation to this Certificate.

3. PERFORMANCE LIMITS

3.1 The Company shall, at all times, ensure that all Equipment that are a source of a Compound of Concern from the Facility are operated to comply with the following Performance Limits:

(a) the maximum concentration of any Compound of Concern at a Point of Impingement shall not exceed the corresponding Ministry Point of Impingement Limit;

(b) for any Compound of Concern that does not have a Ministry Point of Impingement Limit, the maximum concentration of any Compound of Concern at a Point of Impingement shall not be greater than a level assessed as part of the original ESDM Report; or

(c) for any Compound of Concern that does not have a Ministry Point of Impingement Limit, the maximum concentration of any Compound of Concern at a Point of Impingement shall not be greater than the Maximum Concentration Level Assessment submitted to the Ministry and accepted by the Air Standards Manager.

3.2 The Company shall, no later than thirty (30) days prior to:
(a) the introduction of a new Compound of Concern that does not have a Ministry Point of Impingement Limit;

(b) an increase to the concentration at a Point of Impingement of a Compound of Concern that does not have a Ministry Point of Impingement Limit such that the resulting concentration at a Point of Impingement will be greater than the level that was reviewed as part of the original ESDM Report; or

(c) an increase to the concentration at a Point of Impingement of a Compound of Concern that does not have a Ministry Point of Impingement Limit such that the resulting concentration at a Point of Impingement will be greater than the corresponding Maximum Concentration Level Assessment previously accepted by the Air Standards Manager;

submit a proposed or revised Maximum Concentration Level Assessment for the Compound of Concern to the Director for review by the Air Standards Manager.

3.3 The Company may not use the Maximum Concentration Level Assessment prior to thirty (30) days from the date of an acknowledgment letter from the Ministry unless the Company receives written acceptance by the Director.

3.4 If the Air Standards Manager does not accept the proposed Maximum Concentration Level Assessment, the Company shall not introduce or increase the emission rate of the Compound of Concern without approval from the Director.

3.5 The Company shall, at all times, ensure that the noise emissions from the Facility comply with the limits set out in Ministry Publication NPC-205.

4. DOCUMENTATION REQUIREMENTS

4.1 The Company shall, at all times, maintain documentation that describes the current operations of the Facility, including but not limited to:

(a) a current ESDM Report that demonstrates compliance with the Performance Limits for the Facility regarding all Compounds of Concern;

(b) a current Acoustic Assessment Report that demonstrates compliance with the Performance Limits for the Facility regarding noise emissions;

(c) an up-to-date Log that describes each Modification to the Facility; and

(d) a record of the changes to the ESDM Report and Acoustic Assessment Report that documents how each Modification is in compliance with the Performance Limits.

4.2 The Company shall, during regular business hours, make the current Emission Summary Table and Acoustic Assessment Summary Table available for inspection at the Facility by any interested member of the public.

5. REPORTING REQUIREMENTS

5.1 The Company shall provide the District Manager and the Director no later than June 1 of each year, a Written Summary of activities undertaken in the previous calendar year that shall include the following:

(a) a signed statement that the Facility was in compliance with the Performance Limits;

(b) a summary of each Modification that took place in the previous calendar year and resulted in a change in the previously calculated concentration at the Point of Impingement for any Compound of Concern or resulted in a change in the sound levels reported in the Acoustic Assessment Summary Table at any Point of Reception;

(c) a list of each Compound of Concern submitted to the Air Standards Manager for review in the previous calendar year;

(d) a review of any changes to a Ministry Point of Impingement Limit undertaken in the previous calendar year that affect a Compound of Concern emitted from the Facility;
(e) a tabulated summary of the changes in the emission rate of any Compound of Concern and the resultant increase or decrease in the Point of Impingement concentration reported in the ESDM Report over the previous calendar year; and

(f) the Emission Summary Table and Acoustic Assessment Summary Table for the Facility as of December 31 from the previous calendar year.

6. OPERATION AND MAINTENANCE

6.1 The Company shall prepare and implement, not later than three (3) months from the date of this Certificate, operating procedures and maintenance programs for all Processes with Significant Environmental Aspects. The Company shall ensure that all Processes with Significant Environmental Aspects are operated and maintained at all times in accordance with this Certificate, the operating procedures and maintenance programs. The operating procedures and maintenance programs shall specify as a minimum:

(a) frequency of inspections and scheduled preventative maintenance;

(b) procedures to prevent upset conditions;

(c) procedures to minimize all fugitive emissions;

(d) procedures to prevent and/or minimize odorous emissions; and

(e) procedures for record keeping activities relating to the operation and maintenance programs.

7. COMPLAINTS RECORDING PROCEDURE

7.1 If at any time, the Company receives any environmental complaints from the public regarding the operation of the Equipment approved by this Certificate, the Company shall respond to these complaints according to the following procedure:

(a) the Company shall record and number each complaint, either electronically or in a log book, and shall include the following information: the time and date of the complaint and incident to which the complaint relates, the nature of the complaint, wind direction at the time and date of the incident to which the complaint relates and the address of the complainant, if known;

(b) the Company, upon notification of a complaint, shall initiate appropriate steps to determine all possible causes of the complaint, and shall proceed to take the necessary actions to appropriately deal with the cause of the subject matter of the complaint; and

(c) the Company shall complete and retain on-site a report written within one (1) week of the complaint date, listing the actions taken to appropriately deal with the cause of the subject matter of the complaint and any recommendations for remedial measures, and managerial or operational changes to reasonably avoid the recurrence of similar incidents.

8. RECORD KEEPING REQUIREMENTS

8.1 Any information requested by the Ministry concerning the Facility and its operation under this Certificate, including, but not limited to, any records required to be kept by this Certificate, shall be provided to the Ministry, upon request, in a timely manner.

8.2 The Company shall retain, for a minimum of seven (7) years from the date of their creation, except as noted below, all reports, records and information described in this Certificate and shall include but not be limited to:

(a) the current ESDM Report;

(b) the Acoustic Assessment Report;

(c) supporting information used in the emission rate calculations performed in the ESDM Report and Acoustic Assessment
Report to document compliance with the Performance Limits (superseded information must be retained for a period of three (3) years after Modification):

(d) the Log that describes each Modification to the Facility;

(e) the Written Summaries provided to the Ministry;

(f) the operating procedures and maintenance programs, including records on the maintenance, repair and inspection of the Equipment related to all Processes with Significant Environmental Aspects; and

(g) the complaints recording procedure, including records related to all environmental complaints made by the public as required by the section titled Complaints Recording Procedure of this Certificate.

9. REVOCATION OF PREVIOUS CERTIFICATES OF APPROVAL (Air & Noise)

9.1 This Certificate replaces and revokes all Section 9 Certificates of Approval issued to the Facility and dated prior to the date of this Certificate.

10. HEAT CLEANING OVEN

10.1 The Company shall ensure that the heat cleaning oven is operated to comply, at all times, with the following requirements:

(a) The burner flame in the secondary chamber is established before the primary chamber is fired;

(b) The temperature in the secondary chamber, as measured by the thermocouple, is maintained at a minimum of 790 degrees Celsius at all times when the primary chamber is loaded and heat cleaning is in progress;

(c) The burner in the primary chamber is automatically turned off, if the secondary burner fails; and

(d) No substances containing chlorinated and/or fluorinated compounds, including polyvinyl chloride and Teflon, are loaded into the heat cleaning oven.

10.2 The Company shall continuously monitor and record the temperature in the combustion chamber of the oven, when the oven is in operation. The continuous temperature monitoring and recording system shall comply with the following requirements:

<table>
<thead>
<tr>
<th>PARAMETER:</th>
<th>Temperature</th>
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<tbody>
<tr>
<td>LOCATION:</td>
<td>The sample point for the continuous temperature monitoring and recording shall be located at a location where the measurements are representative of the minimum temperature of the gases leaving the secondary chamber of the afterburner.</td>
</tr>
<tr>
<td>PERFORMANCE:</td>
<td>The continuous temperature monitoring and recording system shall meet the following minimum performance specifications for the following parameters.</td>
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</table>
| PARAMETERS/SPECIFICATION | 1. Type: Shielded "K" type thermocouple, or equivalent.  
2. Accuracy: ± 1.5 percent of the minimum gas temperature. |
| DATA RECORDER: | The data recorder must be capable of registering continuously the measurement of the monitor without a significant loss of accuracy and with a time resolution of 1 minute or better. |
| RELIABILITY: | The monitor shall be operated and maintained so that accurate data is obtained during a minimum of 95 percent of the time for each calendar quarter. |
SCHEDULE “A”

Supporting Documentation

(a) Application dated June 22, 2006, signed by Santino Nemi, VP Operations/Manufacturing and submitted by the Company for a Certificate of Approval (Air & Noise);

(b) Emission Summary and Dispersion Modelling Report, dated June 19, 2006;

(c) Acoustic Assessment Report prepared by Church & Trought Inc., dated February 2008 and signed by Santino Nemi and Stephen Kuchma.

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

1. GENERAL

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

2. OPERATIONAL FLEXIBILITY AND PERFORMANCE LIMITS

Condition Nos. 2 and 3 are included to limit Modifications and define the operating envelope permitted by this Certificate. The holder of the Certificate is approved for operational flexibility for the Facility that is consistent with the description of the operations included with the application up to the Facility Production Limit. In return for the operational flexibility the Certificate places performance based limits that can not be exceeded under the terms of this Certificate. Certificate holders will still have to obtain other relevant approvals required to operate the Facility, including requirements under other environmental legislation such as the Environmental Assessment Act.

3. DOCUMENTATION REQUIREMENTS

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

4. REPORTING REQUIREMENTS

Condition No. 5 is included to require the Company to provide a yearly Written Summary to the Ministry.

5. OPERATION AND MAINTENANCE

Condition No. 6 is included to require the Company to properly operate and maintain the Processes with Significant Environmental Aspects to minimize the impact to the environment from these processes.

6. COMPLAINTS RECORDING PROCEDURE

Condition No. 7 is included to require the Company to respond to any environmental complaints regarding the operation of the Equipment, according to a procedure that includes methods for preventing recurrence of similar incidents and a requirement to prepare and retain a written report.

7. RECORD KEEPING REQUIREMENTS

Condition No. 8 is included to require the Company to retain all documentation related to this Certificate and provide
access to Ministry staff, upon request, so that the Ministry can determine if a more detailed review of compliance with the Performance Limits is necessary.

8. REVOCATION OF PREVIOUS CERTIFICATES OF APPROVAL (Air and Noise)

Condition No. 9 is included to confirm that this Certificate replaces all Section 9 Certificate(s) of Approval that have been previously issued for this Facility.

9. BURN-OFF OVEN

Condition No. 10.1 is included to outline the minimum requirements considered necessary to prevent an adverse effect resulting from the operation of the oven.

Condition No. 10.2 is included to require the Company to gather accurate information on a continuous basis so that the environmental impact and subsequent compliance with the Act, the regulations and this Certificate can be verified.

This Certificate of Approval revokes and replaces Certificate(s) of Approval No. 8-3590-94-956 issued on March 10, 1995

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

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

The Notice should also include:

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

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

This Notice must be served upon:

The Secretary* Environmental Review Tribunal 2300 Yonge St., Suite 1700 P.O. Box 2382 Toronto, Ontario M4P 1E4

AND

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

AND

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

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

This instrument is subject to Section 38 of the Environmental Bill of Rights, that allows residents of Ontario to seek leave to appeal the decision on this instrument. Residents of Ontario may seek leave to appeal within 15 days from the date this decision is placed on the Environmental Registry. By accessing the Environmental Registry at www.ene.gov.on.ca, you can determine when the leave to appeal period ends.
The above noted works are approved under Section 9 of the Environmental Protection Act.

DATED AT TORONTO this 18th day of April, 2008

Victor Low, P.Eng.
Director
Section 9, Environmental Protection Act

JK/
c: District Manager, MOE Toronto - District
Kathleen Hearn, Church and Trought Inc.