

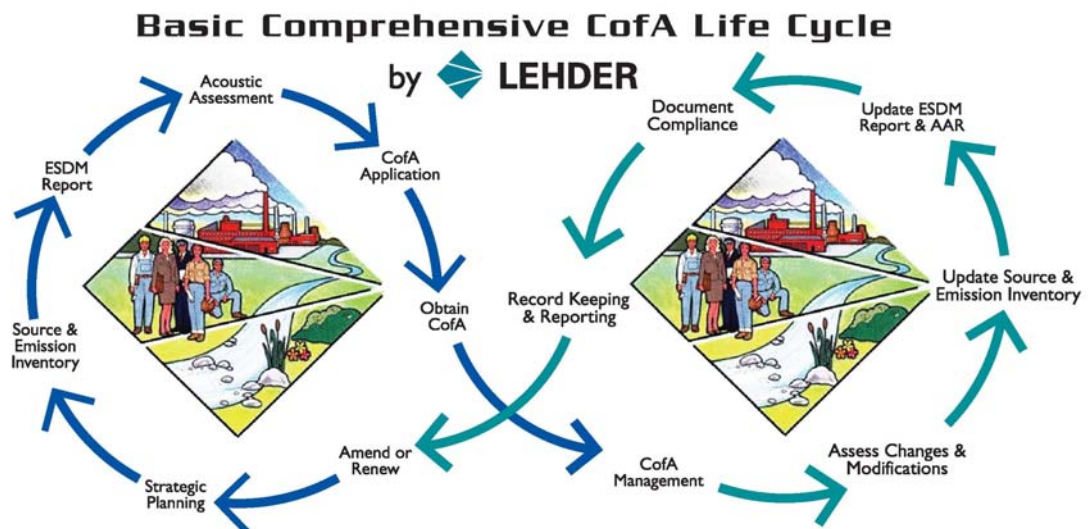
## Basic Comprehensive Certificates of Approval

### Introduction

The Basic Comprehensive CofA is now the preferred Approval of the Ontario Ministry of the Environment (MOE). The MOE has recently issued a user guide to Basic Comprehensive Certificates of Approval. This approach is expected to reduce the delays encountered currently in gaining approvals and to improve Industry focus on maintaining compliance with O.Reg. 419.

### What is a Basic Comprehensive CofA?

A Comprehensive Certificate of Approval incorporates all air emissions sources at a site (with several exceptions) into one CofA document. Further, it allows companies the opportunity to make modifications to their facility without requiring an application for an amendment.



### What are the advantages?

The major advantage of the Comprehensive CofA is that the requirement to attain amendments to the CofA is waived allowing limited operational flexibility to implement process changes, capacity changes, or new equipment.

This will allow changes that would previously require a CofA or an amendment thus eliminating time delays, costs of preparing an application and application costs.

---

**What are the obligations of the CofA holder?**

The holder of a Comprehensive CofA has several obligations (some familiar to current CofA holders and some new) including:

- Demonstrate compliance with Reg. 419 Standards based upon maintaining the currency of the site **Emission Summary and Dispersion Modeling Report**
- Demonstrate that the facility meets, or has a program to meet, the MOE noise guidelines provided in NPC 205
- Ensure that the Emission Summary Table of the **Emission Summary and Dispersion Modeling Report** is available for inspection by the public at all times (this table compares the predicted maximum ground level concentration to the MOE POI standard)
- Submit an annual report summarizing the modifications implemented at the facility and the current Emission Summary Table. The CofA may outline other requirements
- Derive a Maximum Concentration Level (MCL) for any new contaminants (not identified in the initial application) that do not have an established MOE standard or an increase in the emission rate (from that identified in the initial application) of any contaminants that does not have an established MOE standard. The derived MCL must be provided to the MOE and approved prior to implementation of the change
- Maintain compliance with the implementation of new air standards
- Identify processes with *significant environmental aspects* and develop operating, maintenance and record keeping procedures, programs and manuals
- Provide notice to the MOE in the event of environmental complaints or inquiries

---

**Does this new CofA expire?**

The Comprehensive CofA will expire after a finite period of time. Currently, the MOE is using five years. If the facility does not reapply prior to the expiration date, the Comprehensive CofA will revert to a Standard CofA and the operational flexibility is lost.

---

**Should I consider a Comprehensive CofA?**

LEHDER suggests that a facility is a good candidate for a flexible, site wide CofA if the facility:

- operations are covered by several CofAs
- has a large number of emitting sources
- has a history of several amendments a year
- manufactures products based upon mixing, blending or reacting using a wide range of feed stocks containing volatile components

---

**The Emission Inventory is the KEY**

The key to obtaining a site wide flexible CofA is the development of a robust emission inventory. The emission inventory supports the calculation of the facility emission estimates used for the **Emission Summary and Dispersion Modelling Report**.

The emission inventory must:

- include **all** sources
  - include **all** potential contaminants
-

---

**The Emission Inventory is the KEY (Cont'd)**

The LEHDER approach to preparing an emission inventory involves developing a relationship between key process parameters such as production rates, fuel consumption, formulation etc. LEHDER emission inventories are designed to provide optimum flexibility in assessing emissions from new or changed operations in order to maintain currency.

---

**LEHDER Capabilities**

LEHDER capabilities in developing strategic applications for Comprehensive Certificates of Approval include:

- Development of strategic approach considering future production capacity, possible material changes etc.
- Negotiations with MOE Approvals Branch
- Preparation of application package
- Development of Source and Emission Inventories
- Air Dispersion Modeling
- Preparation of Emission Summary and Dispersion Modeling Reports
- Source Emission Testing using MOE recognized stack testing methodologies
- Development of CofA Compliance Management Systems
- Preparation of Annual Summary Reports

---

**For further information**

For further information please contact:

Sid Lethbridge (519) 336-4101 Ext. 222 [slethbridge@lehder.com](mailto:slethbridge@lehder.com)  
Marnie Freer (519) 336-4101 Ext. 226 [mfreer@lehder.com](mailto:mfreer@lehder.com)

---

**About LEHDER**

LEHDER recognizes our client's need to make decisions that provide for operational flexibility while meeting regulatory, economic and social requirements.

LEHDER Environmental Services Limited provides totally integrated solutions to industrial clients throughout North America. Our team of consulting professionals is built around our core strength in industrial environmental, health and safety management.

Visit our web site at [www.lehder.com](http://www.lehder.com)

Factsheet: 0013

---