



**REPORT**

**Alternative Low Carbon Fuel Use at the Lehigh Picton  
Cement Plant**  
**Lehigh Hanson Materials Ltd.**  
*Consultation Report*

Submitted to:

**Lehigh Hanson Materials Ltd.**

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A large, solid red graphic element that starts as a thin line on the left, rises to a peak, and then descends to a horizontal base. It covers the lower right portion of the page.

## Distribution List

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## 1.0 INTRODUCTION

Lehigh Hanson Materials Ltd. (Lehigh) is undertaking efforts to use Alternative Low Carbon Fuels (ALCFs) to supplement the energy required to make portland cement at their Picton Cement Plant (the Site). ALCFs are in use in many cement plants all over the world and represent a proven technology to reduce greenhouse gas emissions. The Site is located at 1370 Hwy 49, Picton, Ontario and currently operates with Environmental Compliance Approval (ECA) for air and noise, #0073-BHGQHC, issued October 31, 2019.

Golder Associates Ltd. (Golder) was retained by Lehigh to prepare an application under Part II.1 of the Ontario Environmental Protection Act (EPA) to amend the existing ECA to allow for a Non-Demonstration (Permanent) Project to use ALCFs at the Site, satisfying Ontario Regulation (O. Reg.) 79/15 (as amended by O. Reg. 54/21 and 824/21) (the ECA Amendment Application). The Site location is illustrated in Figure 1.



**Figure 1: Project Site**

The following is a summary of the structure of this Consultation Report:

- The purpose and scope of this report are provided in Section 1.1
- The consultation and engagement activities are described in Section 2.0, which includes the following:
  - The stakeholder identification
  - Project notification
  - Project website
  - Public meetings
  - Indigenous Community engagement
  - Agency consultation
  - Interest stakeholder consultation

- The comments received and how the Project Team responded to those comments and concerns are provided in Section 3 and the correspondence Summary Table is provided in Section 4.0
- The next steps are provided in Section 5.0.

## 1.1 Purpose and Scope of the Consultation Report

This Consultation Report has been prepared in support of an ALCF ECA application under Part II.1 of the *Ontario Environmental Protection Act* (EPA) to amend the existing ECA, to allow for an ALCF Non-Demonstration (Permanent) Project (the Project) satisfying Ontario Regulation (O. Reg.) 79/15 (as amended by O. Reg. 54/21 and 824/21).

Lehigh retained Golder Associates Ltd. (now WSP Canada Inc. [WSP Golder]) to support Lehigh with preparing the ECA Amendment Application and to support consultation activities throughout the application process. On behalf of Lehigh, WSP Golder has prepared this Consultation Report which provides an overview of all consultation and engagement activities undertaken for the Project to date.

### 1.1.1 Requirements of O. Reg. 79/15

As required by s.8.(2) of O. Reg. 79/15, this Consultation Report captures consultation and engagement activities undertaken with stakeholders, members of the public and Indigenous communities up to November 15, 2022 and includes the following:

- A description of the consultation activities completed to date;
- Summaries of the information provided at the public meetings, copies of written comments or questions submitted and records of oral comments made, either at public meetings or by other means;
- A summary of discussions that the proponent had with Indigenous communities, copies of all written comments or questions submitted and records of oral comments made by Indigenous communities, either at public meetings or by other means;
- A description of how Lehigh responded to concerns expressed during consultation with the public; and
- Copies of notices, reports, and other materials prepared for and used in the public meetings.

Lehigh considers the engagement of Indigenous communities and consultation with adjacent and nearby residents and property owners to be a critical component to their operations. As a result, and in line with the requirements outlined in O. Reg. 79/15 (as amended by O. Reg. 54/21 and 824/21), Lehigh has undertaken a range of consultation and engagement activities in support of the preparation of the ECA Amendment Application.

### 1.1.2 Proposed Fuels and Equipment

As part of the Amendment ECA Application, Lehigh is requesting approval for the following:

- ALCF daily throughput of up to 200 tonnes per day, which may include the following materials:
  - Construction & Demolition (C&D) Materials; including but not limited to primarily wood material with minor amounts of non-recyclable paper and plastic.
  - Industrial, Commercial, and Institutional (IC&I) Materials; including but not limited to primarily non-recyclable paper, plastic and textiles wood material, and tire fibre and fluff.
  - The combustible fraction of non-recyclable household waste (commonly referred to as Refuse Derived Fuel [RDF]).
  - Discarded treated seed.

- Installation of new conveyance and storage equipment for ALCFs at the Site using enclosed containers and buildings.

The Site will target approximately 33% thermal replacement by using mixtures of ALCFs to replace petroleum coke and coal. The above noted ALCFs would meet the following criteria to satisfy the fuel requirements of O. Reg. 79/15:

- Be used as mixtures of non-recyclable and non-odorous materials;
- Not be derived from or composed of any material set out in Schedule 1 of O. Reg. 79/15;
- Wholly derived from or composed of materials that are biomass, municipal waste, or a combination of both; and
- Have a high heat value of at least 10 megajoules per kilogram.

## 2.0 CONSULTATION AND ENGAGEMENT ACTIVITIES

### 2.1 Stakeholder Identification

The Project Team has completed an array of consultation and engagement activities for the Project, with the objective of gathering input and feedback from Indigenous communities and stakeholders, and to allow for views and concerns to be addressed and considered during the Project and the preparation of the Amendment ECA Application. Specifically, Lehigh has consulted and engaged with the following stakeholder groups:

- **Indigenous communities** – At the outset of the study, Lehigh contacted the Ministry of the Environment, Conservation and Parks (MECP) requesting the Director's assistance in confirming a preliminary list of communities that will be engaged based on proximity to the Project. The MECP responded confirming a list of communities. The following communities were included on the Project contact list:
  - Alderville First Nation
  - Curve Lake First Nation
  - Hiawatha First Nation
  - Mississaugas of Scugog Island First Nation
  - Mohawks of the Bay of Quinte First Nation
  - Kawartha Nishnawbe
  - Williams Treaties First Nations
- **Agencies**
  - Elected officials:
    - Members of Parliament
    - Members of Provincial Parliament
    - Municipal Councillors and Mayor of Prince Edward County

- Municipal staff:
  - Prince Edward County
- Provincial agencies:
  - Ministry of the Environment, Conservation and Parks
  - Ministry of Energy
  - Ministry of Indigenous Affairs
  - Ministry of Municipal Affairs and Housing
  - Ministry of Natural Resources and Forestry (formerly known as the Ministry of Northern Development, Mines, Natural Resources and Forestry)
  - Ministry of Transportation
  - Ministry of Citizenship and Multiculturalism (MCM) (formerly known as the Ministry of Tourism, Culture and Sport [MTCS])
  - Ministry of the Solicitor General
  - Ministry of Labour, Training and Skills Development
  - Office of the Auditor General of Ontario
  - Quinte Conservation Authority
- Federal agencies:
  - Fisheries and Oceans Canada
  - Transport Canada
  - Environment Canada
  - Indigenous and Northern Affairs Canada
- **Public Stakeholders** – At the outset of the study, the Project Team developed an initial list of members of the public that may have interest in the Project, including those who have participated in consultation opportunities on other projects at the Site. Canada Post Neighbourhood Mail™ was utilized to send project notices to residents/property owners in Picton, Ontario.

In addition to these initial lists of stakeholders and Indigenous communities, the Project Team continued to update the contact list with interested parties who contacted the Project Team in response to Project notices (refer to Section 2.2) and those who registered for the public meetings (refer to Section 2.4).

## 2.2 Project Notification

### 2.2.1 Notice of Intention to Apply under Ontario Regulation 79/15 and Notice of Public Meeting #1

The *Notice of Intention to Apply under Ontario Regulation 79/15* was combined with the *Notice of Public Meeting #1* and issued in March 2022. The notice was distributed in the following manner:

- Published in the following newspapers:
  - *Picton County Weekly News* and *Picton Gazette* on Thursday, March 17, 2022, and Thursday, March 24, 2022.
- Delivered to 5,953 residents / property owners in the Picton via Canada Post's Neighbourhood Mailing / Unaddressed Admail Service on March 24, 2022; and
- Distributed via email to the contact list on March 17, 2022.

The Notice introduced the project indicating that Lehigh is preparing studies and an ALCF ECA application under Part II.1 of the EPA that satisfies O. Reg. 79/15 for the use of ALCFs at the Site. The Notice invited the public to attend virtual Public Meeting #1 and included Project Team contact information for further questions, as well as a link to the Project Website.

Please refer to Appendix A for a copy of the *Notice of Intention to Apply under Ontario Regulation 79/15 and Notice of Public Meeting #1*.

Following the distribution of the first Notice and prior to Public Meeting #1, the Project Team received twelve emails from the public. The topics of interest were addressed as part of Public Meeting #1 and individual responses were sent following Public Meeting #1. In addition, an email was received on behalf of the Prince Edward County Conservancy on April 2, 2022 with a series of questions. The Project Team met with representatives of the Prince Edward County Conservancy on April 7, 2022 prior to Public Meeting #1 to address their questions. The Project Team also received an email from the Mississaugas of Scugog Island First Nation on March 17, 2022 requesting an introductory meeting. The Project Team met with representatives of the Mississaugas of Scugog Island First Nation on April 22, 2022 to introduce the Project and address any preliminary questions.

### **2.2.2 Notice of Public Meeting #2**

The *Notice of Public Meeting #2* was issued in August 2022. The Notice was distributed in the following manner:

- Published in the following newspaper:
  - *Picton County Weekly News* and *Picton Gazette* on Thursday, August 4, 2022, and Thursday, August 11, 2022.
- Delivered to 5,978 residents / property owners in the Picton via Canada Post's Neighbourhood Mailing / Unaddressed Admail Service the week of August 1, 2022; and
- Distributed via email to the contact list on August 11, 2022.

The Notice provided an overview of the study, invited the public to attend virtual Public Meeting #2 and included Project Team contact information for further questions, as well as a link to the Project Website. The Notice also advised that in-person viewing of the webinar could be arranged at the Lehigh Cement Plant upon request. No requests were received; however, Lehigh prepared a conference room to allow for in-person viewing of the webinar should anyone come to the Lehigh Cement Plant.

Please refer to Appendix A for a copy of the *Notice of Public Meeting #2*.

Following the distribution of the second Notice and prior to Public Meeting #2, the Project Team received 5 emails from the public. Emails included requests for Public Meeting #2 registration and general support for the Project.

The topics of interest was addressed as part of Public Meeting #2 and individual responses were sent following Public Meeting #2.

### 2.2.3 Notice of Completion of the Consultation Report

The *Notice of Completion of the Consultation Report* is being issued in November 2022. The Notice will be distributed in the following manner:

- Published in the following newspapers:
  - *Picton Gazette* on Thursday, November 24, 2022, and Thursday, December 1, 2022; and
  - *Picton County Weekly News* on Thursday, December 1, 2022.
- Delivered to 5,994 residents / property owners in the Picton via Canada Post's Neighbourhood Mailing / Unaddressed Admail Service on November 24, 2022; and
- Distributed via email to the contact list on November 24, 2022.

Please refer to Appendix A for a copy of the *Notice of Completion of the Consultation Report*.

## 2.3 Project Website

A Project website page (<https://www.lehighpictonalcf.ca/>) was established by the Project Team to provide periodic Project updates. Updates provided in the Project website to date are listed in Table 1.

**Table 1: Summary of Project Website Updates**

Date of Update	Summary of Update
March 17, 2022	The Project Team uploaded the <i>Notice of Intention to Apply under Ontario Regulation 79/15 and Notice of Public Meeting #1</i> on March 17, 2022.
April 12, 2022	The Project Team uploaded the Public Meeting #1 presentation on April 12, 2022.
August 8, 2022	The Project Team uploaded the Notice of Public Meeting #2 on August 8, 2022.
August 26, 2022	The Project Team uploaded the Public Meeting #2 presentation on August 26, 2022.
November 23, 2022	The Project Team will upload a copy of the <i>Notice of Completion of Consultation Report</i> and the Consultation Report on November 23, 2022.

As additional project materials are finalized (e.g., supporting study reports) and Project documentation are finalized, they will continue to be uploaded to the website to provide stakeholders with readily available Project information. Lehigh will also continue to provide status updates through the website and contact list as the Project progresses. Refer to Appendix B for a printout of the website.

## 2.4 Public Meetings

### 2.4.1 Public Meeting #1

The first public meeting for this Project was held as a virtual information session (webinar) using GoToWebinar, on Thursday, April 7, 2022 from 6:00 p.m. to 8:00 p.m. Public Meeting #1 consisted of a presentation given by members of the Project Team and several question-and-answer periods throughout the presentation. Due to restrictions related to COVID-19, and amendments made by O. Reg. 824/21, an in-person meeting did not take place.

The presentation slides covered the following topics:

- A background on the Lehigh Picton Cement Plant and Lehigh Hanson;



- An overview of the differences between clinker, cement and concrete;
  - An overview of the production of clinker and cement process;
  - An outline of the carbon dioxide (CO<sub>2</sub>) and cement production process;
- Overview of O. Reg. 79/15, Alternative Low Carbon Fuels; including the permitting process and timeline;
- Explanation of ALCFs and pathway of an ALCF;
  - ALCF Use and Environmental Impact;
  - Ineligible and eligible ALCFs;
- Overview of the Stakeholder Engagement and Public Consultation for this Project;
- Overview of the Carbon Dioxide Emission Intensity Assessment, Emission Summary and Dispersion Modelling (ESDM) Report, and Acoustic (Noise) Assessment Report; and
- How to contact the Project Team and participate in the Study.

Refer to Appendix C for copies of the materials presented at the April 2022 public meeting.

Technical experts from Lehigh and WSP Golder were in attendance to answer questions and document comments and concerns from attendees.

Sixty-eight (68) individuals registered to attend the virtual information session. Forty-nine (49) individuals attended the virtual information session. Attendees were encouraged to ask questions or make comments during the presentation using the chat function of GoToWebinar. A total of eighty-four (84) questions / comments were received during the meeting and were answered live by members of the Project Team (refer to Appendix D for details on these questions / comments).

Following Public Meeting #1, the Project Team received five (5) emails with questions / comments from the public (April 8, 10, 13, and 14, 2022). The summary of these emails is included in Appendix E – Correspondence Summary Table.

### **2.4.2 Public Meeting #2**

The second public meeting for this Project was held as a virtual information session (webinar) using Microsoft Teams, on Thursday, August 25, 2022 from 6:00 p.m. to 8:00 p.m. Public Meeting #2 consisted of a presentation given by members of the Project Team and question-and-answer periods throughout the presentations. Due to restrictions related to COVID-19, and amendments made by O. Reg. 824/21, an in-person meeting did not take place. The Notice also advised that in-person viewing of the webinar could be arranged at the Lehigh Cement Plant upon request. No requests were received, however, Lehigh prepared a conference room to allow for in-person viewing of the webinar should anyone come to the Lehigh Cement Plant.

The presentation slides covered the following topics:

- Overview of O. Reg. 79/15, Alternative Low Carbon Fuels; including the permitting process and timeline;
- An overview of the differences between clinker, cement and concrete;
  - An overview of the production of clinker and cement process;
  - An outline of the carbon dioxide (CO<sub>2</sub>) and cement production process;

- A summary of the Public Meeting #1 comment received and an provide an overview of some key themes from the Public Meeting #1 feedback;
- An overview of the proposed ALCFs for Picton Cement Plant and the anticipated supply of ALCFs;
- Explanation of the current versus future operations with ALCFs at the Picton Cement Plant;
- Explanation of the ALCF material handling process;
- Provide conceptual engineering drawings for the ALCF transportation and storage;
- Explanation of Carbon Dioxide Emission Intensity;
- Explanation of the technical studies that were undertaken in support of this project;
- Present the Carbon Dioxide Emission Intensity Assessment, Emission Summary and Dispersion Modelling (ESDM) and Acoustic (Noise) Assessment results;
- Additional Study Considerations:
  - Archaeology / Cultural Heritage
  - Traffic Impact
- How to contact the Project Team and participate in the Study.

Refer to Appendix C for copies of the materials presented at the August 2022 public meeting.

Technical experts from Lehigh and WSP Golder were in attendance to answer questions and document comments and concerns from attendees.

Thirty-nine (39) individuals registered to attend the virtual information session. Twenty-four (24) individuals attended the virtual information session. Attendees were encouraged to ask questions during the presentation using the Q&A function of Microsoft Teams as well as via the Project Team email.

Twenty-two (22) comments or questions were received using the Q&A function, and eight (8) comments or questions were submitted via email to the Project Team during the meeting (refer to Appendix D for details on these comment / questions). Following Public Meeting #2, the Project Team received three (3) emails with comments / questions from the public (August 27 and 30, and September 2, 2022). The summary of these emails is included in Appendix E – Correspondence Summary Table.

## 2.5 Indigenous Community Engagement

As indicated in Section 2.1, letters were sent to the following Indigenous communities at the outset of the study with details on the work being undertaken and inviting them to meet with the Project Team and again in advance of Public Meeting #2:

- Alderville First Nation
- Curve Lake First Nation
- Hiawatha First Nation
- Mississaugas of Scugog Island First Nation
- Mohawks of the Bay of Quinte First Nation

- Kawartha Nishnawbe First Nation
- Williams Treaties First Nations

Due to the Mohawks of the Bay of Quinte First Nation's proximity to the Site, the WSP Golder followed up via phone call on June 1 and June 8, 2022. Curve Lake First Nation and Mississaugas of Scugog Island First Nation were the only Indigenous communities to respond to the notices sent.

### **2.5.1 Mississaugas of Scugog Island First Nation**

The Mississaugas of Scugog Island First Nation (MSIFN) emailed the Project Team on March 17, 2022 requesting an introductory call with the Project Team. A meeting with representatives from the MSIFN and the Project Team was held on April 22, 2022. The purpose of the meeting was to provide the MSIFN with an overview of the Project and answer questions they had. The following topics were discussed:

- Whether a lifecycle analysis will be completed for the potential ALCFs;
- Quantity of ALCFs required and backup options if there is a lack of supply;
- Whether the site would function as a typical waste management operation;
- Whether Lehigh would own the potential fuel processing facility;
- Inquiry about why all the Williams Treaty First Nation communities weren't included in the Lehigh's contact list;
- Reduction of emissions from the cement production process;
- Restoration plans for the Lehigh's limestone mining operation;
- End-of-use date for the limestone quarry;
- Whether Lehigh has a Reconciliation Action Plan or Indigenous Relations Plan as a corporate policy;
- The amount of waste that could be diverted from landfill per year by way of using ALCFs; and
- The geographic source of the ALCFs.

Following the meeting, the Project Team provided the representatives of MSIFN with the recording of the meeting on May 4<sup>th</sup>, 2022.

### **2.5.2 Curve Lake First Nation**

Curve Lake First Nation (CLFN) emailed a letter to the Project Team on April 20, 2022. CLFN noted the following in the letter:

- The project being located within the Traditional Territory of Curve Lake First Nation;
- Requirement of a file fee for this project which include project updates as well as review of standard material and project overviews;
- Requesting a summary statement indicating how the project will address the following areas that are of concern to the CLFN within their traditional and treaty territory:
- possible environmental impact to drinking water; endangerment to fish and wild game; impact on Aboriginal heritage and cultural values; and to endangered species, lands, savannas, etc.

- Advising to arrange a meeting with representatives of CLFN following the review of the information provided by the Project Team;
- Noting that if any excavation would unearth bones, remains, or other such evidence of a native burial site or any other archaeological findings that CLFN be notified immediately; and
- Noting that should a Stage 1 Archaeological Assessment be conducted that trained Cultural Heritage Liaisons from CLFN engaged to participate in the archaeological assessment process.

The Project Team emailed a response letter on June 10, 2022. The letter noted the following:

- Noting that the filing fee had been paid to CLFN;
- Noting that no impacts to drinking water, fish and wild game, Aboriginal heritage and cultural values, and endangered species, lands, savannas, etc. were anticipated as part of this project;
- Noting that the land use of the study area designated as aggregate by Prince Edward County and that there will be no property impacts or widening of Highway 49;
- Noting that a Stage 1 Archaeological Assessment was not deemed as required as part of this project at this time and should a Stage 1 Archaeological be deemed required CLFN would be engaged;
- Noting that the completion of the consultation and submission of the ALCF application to MECP is anticipated for Q3 2022; and
- Noting that the Project Team would be happy to meet with CLFN to discuss the project and look to benefit from Indigenous Knowledge that CLFN is willing to share.

CLFN responded via email on August 21, 2022 noting that they were encouraged in particular to hear about working together to build a strong relationship between CLFN and Lehigh Hanson and that their main goal was to obtain the information/documents/plans necessary to understand the project and assist with getting reviews done either by CLFN staff and/or supporting consultants. CLFN also requested meeting to have an initial discussion. The Project Team met with Francis Chua, an independent consultant supporting CLFN, on September 14, 2022. During the meeting, the following topics were discussed:

- WSP Golder provided an overview of the project status and topics covered during the two Public Meetings;
- What the facility is burning currently and what proposed ALCFs were being considered;
- How much would the ALCFs replace the coal and petcoke;
- Operational controls for ALCFs and air monitoring at the end of the stack;
- By-products from using ALCFs;
- Timeline for submitting the ALCF permit application;
- If there are any environmental assessments or monitoring being conducted at the facility;
- If there are any historical ecological studies at the facility that are available;
- Protection of human health and the environment under the Ontario Regulation;
- Reports will be made available for review in support of the ALCF permit application; and
- Timeline for review of materials / reports by Curve Lake First Nation and associated cost for review.

Following the meeting, the representative of CLFN provided a template for a Curve Lake First Nation capacity funding agreement and summarized the timeline for CLFN's review of the Consultation Report and associated technical studies via email. The Project Team responded via email noting that Lehigh looks forward to developing a meaningful long-term relationship with CLFN and suggested that the best path forward to developing this long-term relationship is to create a dialogue with CLFN in the form of a meeting in order to provide more details about the project, address areas of interest or concern about the project, and assist in developing CLFN's understanding of the project and their environmental concerns, including the air emissions from the project. Discussions with CLFN are ongoing.

## 2.6 Agency Consultation

As indicated in Section 2.1, emails were sent to municipalities and various provincial and federal government agencies at the outset of the study with details on the work being undertaken and inviting them to attend Public Meeting #1 and again in advance of Public Meeting #2.

### 2.6.1 Ministry of Citizenship and Multiculturalism

On April 14, 2022, the Ministry of Citizenship and Multiculturalism (MCM) (formerly known as the Ministry of Tourism, Culture and Sport [MTCS]) provided a letter to the Project Team via email that noted the following:

- The proponent is required to determine a project's potential impact on known (previously recognized) and potential cultural heritage resources under the ECA process;
- The ECA project may impact archaeological resources and should be screened using the MCM Criteria for Evaluating Archaeological Potential and the Criteria for Evaluating Marine Archaeological Potential to determine if an archaeological assessment is needed;
- A Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment is required to be conducted for the entire study area during the planning phase and will be summarized in the ECA Report;
- All technical cultural heritage studies and their recommendations are to be addressed and incorporated into ECA projects;
- MCM is to be advised whether any technical cultural heritage studies will be completed for this ECA project, and provided them to MCM before issuing a Notice of Completion or commencing any work on the site; and
- If screening has identified no known or potential cultural heritage resources, or no impacts to these resources, please include the completed checklists and supporting documentation in the ECA report or file.

The Project Team provided a letter response on June 10, 2022 seeking clarification on the scope of work and outlining the proposed infrastructure footprint associated with the project. The Project Team noted that a new storage / material handling facility will be constructed within the active cement plant as part of the ALCF project. The storage facility will be confined to a 0.5-1 hectare (ha) area within the plant in close proximity to the kiln system. The ALCFs project footprint is small in relation to the facility size and will not result in ground disturbance to other areas within the property. All ground disturbance will be confined to areas of previous disturbance within the active cement plant. The Project Team noted that the Picton Cement Plant (1958) was constructed prior to the enactment of the *Ontario Heritage Act*, 1990; and no archeological assessments would have been completed at the time under the *Aggregate Resources Act*. As such, a Stage 1 Archaeological Assessment and/or Cultural Heritage Report have not been produced for the property. The Project Team inquired if it is still MCM's recommendation to proceed with a Cultural Heritage Report knowing that the ground disturbance will not be extended beyond an area previously disturbed within the active cement plant. The Project Team noted that it is

our belief that this project does not require an Archaeological Assessment but would like clarification as to whether a Cultural Heritage Report is required given the nature of the proposed disturbance. The Project Team followed up with Heritage Planner assigned to this project at the time (Jack Mallon) as well as the Team Lead (Acting), Heritage (Karla Barboza) from MCM via email on July 15 and August 16, 2022.

On September 26, 2022, Karla Barboza (MCM) provided the Project Team with a response via email noting the following recommendations:

- Archaeological resources: complete the *Criteria for Evaluating Archaeological Potential* screening checklist documenting that the project area has been subject to recent extensive and intensive ground disturbance. If the undertaking impacts water, complete the *Criteria for Evaluating Marine Archaeological Potential* screening checklist to determine whether a marine archaeological assessment is required.
- Built heritage resources and cultural heritage landscapes: complete the *Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes* screening checklist. Check with the municipality (municipal heritage planner) if the property may have cultural heritage value.

The Project Team completed the checklists for evaluating potential for built heritage resources, cultural heritage landscapes and archaeological resources and provided these checklists to Karla Barboza (MCM) via email on November 14, 2022. The Project Team noted that while the study area is within an area of archaeological potential due to its proximity to water and known archaeological sites, the extensive and widespread disturbance within the cement plant has removed archaeological potential for the footprint of the building etc. for the ALCF project. The Project Team noted that the Lehigh Picton Cement Plant has buildings on the property that are older than 40 years old, and therefore the screening form indicates that the facility may have the potential for cultural heritage. However, the form also indicates that buildings that are 40+ years do not necessarily hold cultural value or interest. The Project Team noted that this is a heavy industrial site and the buildings experience significant impacts from the operations. As part of this project, Lehigh is making some minimal modifications to existing buildings (no removal and simply alterations to allow for conveyance of ACLFs) to allow for the use of alternative low carbon fuels (ALCFs) in the cement kiln and reduce their emissions of greenhouse gases. The ALCF project will be limited to a small pre-disturbed area with a new building constructed with covered conveyors connecting to the existing kiln buildings.

## **2.6.2 Meetings**

This section describes the meetings that were held with the Ministry of the Environment, Conservation and Parks and the Environmental Advisory Committee from Prince Edward County.

### **2.6.2.1 Ministry of the Environment, Conservation and Parks**

The first Pre-Submission Consultation Meeting with the MECP Permissions Branch was held virtually on January 10, 2022. The purpose of this meeting was to discuss the following topics:

- approach for public meetings;
- supporting documentation for Amendment ECA Application; and
- timing of Amendment ECA Application approval.

Additionally, the meeting provided an opportunity to provide an overview of the Site, including the current approvals and confirm next steps in obtaining permanent approval to use ALCFs. Lehigh discussed the application process, including the approach for public meetings, supporting documentation for the amendment ECA application, timing of the amendment ECA application approval and the proposed fuels to be used. Lehigh indicated they will move forward with the O. Reg. 79/15 Amendment ECA Application

A second Pre-Submission Consultation Meeting with the MECP was held on May 11, 2022 to discuss the roadmap for sulphur dioxide (SO<sub>2</sub>) compliance while also seeking ALCFs. This is summarized below:

- One joint application to be submitted by the third quarter (Q3) of 2022 for ALCFs (meeting requirements of O. Reg. 79/15) and ECA amendment for SO<sub>2</sub> and Limited Operational Flexibility condition to be reviewed by one air approvals engineer.
- Discussed Lehigh's SO<sub>2</sub> abatement report highlighting trials to reduce SO<sub>2</sub> emissions to date.
- Kiln 3 and associated conditions to be removed from the future ECA and ESDM Report; if back online in the future an amendment can be submitted.
- The ESDM that is submitted in Q3 for use of ALCFs should include the following:
  - A screening fumigation model is sufficient to show whether the stacks are impacted by shoreline fumigation from the Bay of Quinte.
  - Description of the CEMS, and other O&M procedures for control equipment
  - A screening of Guideline A-7 in-stack limits for ALCFs
  - Fuel Handling Protocols to indicated storage & handling
  - Process controls, e.g., interlocks and measuring points.
  - A description of the SO<sub>2</sub> Abatement activities and status of trials and an indication when the trials are complete.
- Lehigh to keep local MECP office apprised as the ALCF project progresses and updates with the SO<sub>2</sub> trials. Lehigh was informed a new local district officer; Mark Lamirande has been assigned to Lehigh.

### **2.6.2.2 Prince Edward County**

On March 1, 2022, Project Team members from Lehigh and WSP Golder met with the Environmental Advisory Committee from Prince Edward County. The purpose of the meeting was to provide the Environmental Advisory Committee an opportunity to preview the materials that were being made available at Public Meeting #1 in April. This provided the opportunity for questions and discussion and for the Project Team to take into consideration municipal comments prior to finalizing the presentation. During the meeting, the following topics were discussed:

- Lehigh's approach to scrubbing emissions on Alternative Low Carbon Fuels (ALCFs);
- The source for refuse-derived fuel (RDF);
- Heat reclamation / recovery and units of measurement;
- International success using ALCFs;
- Capturing CO<sub>2</sub> to convert to bio-fuel;



- How much RDF material is needed to operate the plant;
- Timeline of the ALCF permitting process; and
- Lehigh's relationships with local municipalities.

## **2.7 Interested Stakeholder Consultation**

### **2.7.1 Prince Edward County Conservancy Meeting**

On April 7, 2022, Project Team members from Lehigh and WSP Golder met with the Prince Edward County Conservancy (County Conservancy). The purpose of the meeting was to provide further details on the ALCF project and answer their questions noted in their April 2, 2022 email. During the meeting, the following topics were discussed:

- When coal will be eliminated at the plant;
- How natural gas is received at the plant;
- The proposed ALCF sources;
- What is being emitted from the stacks and what is being emitted into Picton Bay;
- How Lehigh is going to reduce greenhouse gas (GHG) emissions;
- Explanation of the Emission Summary and Dispersion Modelling (ESDM) Report;
- Which regulatory agency approves the ECA application;
- What the quantity of ALCF use is being proposed for the application;
- The Zero Waste Europe article that recommends the exclusion of refuse derived fuels (RDFs) in cement plants and explanation that ALCFs are widely used in Europe with great success;
- Explanation of the cement kiln and its natural scrubbing ability;
- St. Mary's ALCF implementation issues;
- Impacts to air and water;
- On-site ALCF storage facility;
- Why the coal at the Site is not covered; and
- The environmental monitoring that takes place at the Site.

Following the meeting, a representative from the County Conservancy provided the Zero Waste Europe article that recommends the exclusion of RDFs in cement plants that was referenced during the meeting. The Project Team provided a letter response to the article's four main conclusions and noted that the possible issues raised by Zero Waste Europe do not apply to the ALCF application at Lehigh Picton Plant and the concerns are prevented / considered as part of the conditions of O. Reg. 79/15 via the Project Team email.

On May 27, 2022, the County Conservancy followed up with the Project Team inquiring about when they could expect to receive responses to their questions outlined in their April 2, 2022 email and when the Project Team was planning to hold Public Meeting #2. The Project Team provided individual responses to the County Conservancy questions on June 13, 2022 and July 11, 2022. The Project Team noted that they appreciated County Conservancy's assistance in the reduction of GHG emissions from the Lehigh Picton Cement Plant.



### 3.0 HOW THE PROJECT TEAM ADDRESSED COMMENTS AND CONCERNS

Throughout the Project, the Project Team has actively sought feedback from stakeholders, including members of the public, municipal staff and agencies, and Indigenous communities. O. Reg. 79/15 requires two main consultation opportunities, prior to submitting an ALCF ECA application, including Public Meeting #1 and Public Meeting #2 (described further in Section 2.4, and summarized in Appendix D). All correspondence received via email are summarized in Appendix E – Correspondence Summary Table. In addition to these two main opportunities, the Project Team held meetings with the Mississaugas of Scugog Island First Nation and Curve Lake First Nation (Section 2.5), the Environmental Advisory Committee from the Prince Edward County and MECP (Section 2.6), and the Prince Edward County Conservancy (Section 2.7), and responded to questions and comments directly via email or verbally at public meetings.

Lehigh will continue to respond to comments received about this application and the use of ALCFs at the Site.

### 4.0 CORRESPONDENCE SUMMARY TABLE

Comments on the Project have been requested and encouraged by the Project Team through the various consultation and engagement activities completed for the Project. A table has been prepared to provide a detailed record of all correspondence received or sent in relation to the consultation and engagement activities for the Project. The correspondence summary table is presented in Appendix E and is current to November 15, 2022.

The questions and comments brought up during Public Meeting #1 and Public Meeting #2 were addressed during the Public Meeting #1 and Public Meeting #2 question and answer periods. There were no new topics of concern brought up during Public Meeting #2. Details on the questions and comments brought up during both Public Meetings are presented in Appendix D. The main topics of interest raised by the public are also addressed in the following required technical studies: Emission Summary and Dispersion Modelling Report, Acoustic Assessment Report, Carbon Dioxide Emission Intensity Report. Additionally, minor topics of interest are addressed in the following supplementary assessments: Traffic Impact Study and archaeological / cultural heritage potential screening checklists.

### 5.0 CLOSURE AND NEXT STEPS

Consultation and engagement activities for the Project have included Project notifications via addressed email, mail, Canada Post Neighbourhood Mailing / Unaddressed Admail, and the project website, as well as public meetings, municipal meeting, phone calls, e-mails, website updates. These efforts have been completed by the Project Team to undertake early and meaningful consultation and engagement with persons and groups who may be impacted or have an interest in the Project. Lehigh understands that early and meaningful consultation and engagement is an integral component of the Project planning and approvals processes, and it is a way for Lehigh to continue building a relationship of mutual respect and trust with the community in which the Project is located.

This Consultation Report is being made available on the Project website for public viewing. After this report is made available, the following activities are planned regarding the submission of the application:

- Preparation of the Amendment ECA Application package, including all supporting documents;
- Submission of the Amendment ECA Application package to MECP;
- MECP confirmation of completeness of the package;

- MECP to post the application on the Environmental Registry of Ontario ([ero.ontario.ca](http://ero.ontario.ca)) which will be available for a public review period; and
- MECP to make a decision if the application is approved.

During MECP's review period and going forward, Lehigh will continue to provide Project notifications through the Project website and Project Contact list.

## Signature Page

**WSP Canada Inc.**



Nadia Dabagh, B.Sc.  
*Environmental Planner*



Jamie McEvoy, P.Eng  
*Senior Air Quality Engineer*

ND/JM/ca

[https://golderassociates.sharepoint.com/sites/1500446/lehighlowcarbonfuelsecaontario/shared documents/draft eca application \(internal master\)/att 3 - public consultation report/consultation report/2148080301-001-r-rev0-lehigh-consultation report\\_23nov2022.docx](https://golderassociates.sharepoint.com/sites/1500446/lehighlowcarbonfuelsecaontario/shared%20documents/draft%20eca%20application%20(internal%20master)/att%203%20-%20public%20consultation%20report/consultation%20report/2148080301-001-r-rev0-lehigh-consultation%20report_23nov2022.docx)

**APPENDIX A**

# Project Notification

## Notice of Intention to Apply under Ontario Regulation 79/15

### Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

#### Background

Lehigh Hanson Materials Ltd. (Lehigh), a part of Heidelberg Cement, is undertaking efforts to use Alternative Low Carbon Fuels (ALCFs) to supplement the energy required to make Portland Cement at their Picton Cement Plant (the Site). ALCFs are in use in many cement plants all over the world and represent a state-of-the-art technology to reduce greenhouse gas emissions. The use of ALCFs is a key component of Heidelberg Cement's global carbon reduction strategy and diverts non-recyclable materials from landfills. The Site is located at 1370 Hwy 49, Picton Ontario. Lehigh currently operates with Environmental Compliance Approval (ECA) for air and noise, #0073-BHGQHC, issued October 31, 2019, for its Portland Cement plant.

#### Alternative Low Carbon Fuel Study

Lehigh has initiated the preparation of an Amendment ECA Application following Ontario Regulation (O. Reg.) 79/15 and its amendments under the *Environmental Protection Act* to permanently use ALCFs at the Site.

Lehigh is proposing to undertake technical studies and prepare an Amendment ECA Application to support the following:

- Develop a list of approved ALCFs that may include the following materials:
  - Construction and Demolitions (C&D) materials: primarily wood material with minor amounts of non-recyclable paper and plastic.
  - Industrial, Commercial, and Institutional (IC&I) materials: primarily non-recyclable paper, plastic and textiles but including wood material, and tire fibre and fluff.
  - The combustible fraction of non-recyclable household waste – commonly referred to as Refuse Derived Fuel (RDF).
  - Discarded treated seed.
- Install new conveyance and storage equipment.

#### Public Meeting

In support of this application, and in accordance with O. Reg. 79/15 and its amendments, and Lehigh's current ECA approval, Lehigh has scheduled the first of two public meetings.

Public Meeting #1 will be held as a virtual information session, consisting of a presentation given by members of the Project team and a question-and-answer period. The meeting is designed to provide information on the intent to submit an Amendment ECA Application for the Site under O. Reg. 79/15 and its amendments, provide background information on ALCFs, and provide an overview of the studies that are being undertaken.

**The virtual information session (webinar) will be held on April 7th, 2022 at 6:00 p.m. to 8:00 p.m.**

To participate in the virtual event, which will be held using GoToWebinar, please visit the Project website for the link to register for the event. Pre-registration is required.

[www.LehighPictonALCF.ca](http://www.LehighPictonALCF.ca)

#### Contact Us

Lehigh values your input on this matter. Please contact our Project Team for more information about this study or to be added to the contact list for future updates:

**E-mail:** [LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)

**Nick Papanicolaou**  
Lehigh Hanson Materials Limited, Picton Plant  
Environmental Manager, Canada  
**Phone:** 613-438-0361

**Jamie McEvoy**  
Golder Associates Ltd.  
Senior Air Quality Engineer, Project Manager  
**Phone:** 613-592-9600 ext. 3254

If you are unable to attend, information presented at the public meeting will be made available on the project website.



## Notice of Public Meeting #2

### Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

#### Background

Lehigh Hanson Materials Ltd. (Lehigh), a part of Heidelberg Cement, is undertaking efforts to use Alternative Low Carbon Fuels (ALCFs) to supplement the energy required to make Portland Cement at their Picton Cement Plant (the Site). ALCFs are in use in many cement plants all over the world and represent a state-of-the-art technology to reduce greenhouse gas emissions. The use of ALCFs is a key component of Heidelberg Cement's global carbon reduction strategy and diverts non-recyclable materials from landfills. The Site is located at 1370 Hwy 49, Picton Ontario. Lehigh currently operates with Environmental Compliance Approval (ECA) for air and noise, #0073-BHGQHC, issued October 31, 2019, for its Portland Cement plant.

#### Alternative Low Carbon Fuel Study

Lehigh has initiated the preparation of an Amendment ECA Application following Ontario Regulation (O. Reg.) 79/15 and its amendments under the *Environmental Protection Act* to permanently use ALCFs at the Site.

Lehigh has prepared studies and is preparing an application to support the following:

- A daily throughput of ALCFs at the Site of up to 200 tonnes per day;
- Develop a list of approved ALCFs for the Site that may include the following materials:
  - Construction and Demolitions (C&D) materials: primarily wood material with minor amounts of non-recyclable paper and plastic.
  - Industrial, Commercial, and Institutional (IC&I) materials: primarily non-recyclable paper, plastic and textiles but including wood material, and tire fibre and fluff.
  - The combustible fraction of non-recyclable household waste – commonly referred to as Refuse Derived Fuel (RDF).
  - Discarded treated seed.
- Install new conveyance and storage equipment for ALCF at the site using enclosed containers and buildings.

#### Public Meeting #2

Public Meeting #1 was held on April 7, 2022 to provide an overview of the studies being undertaken and the proposed ALCF application. In support of this application, and in accordance with O. Reg. 79/15 and its amendments, and Lehigh's current ECA approval, Lehigh has now scheduled the second public meeting to address comments received after the first public meeting, present the results of the technical studies, and provide next steps in the process.

Public Meeting #2 will be held as a virtual information session, consisting of a presentation given by members of the Project Team and a question-and-answer period. You will be able to ask questions during the public meeting, however if you would like to submit questions prior to Public Meeting #2, please email the Project Team at the project email address provided below. Due to restrictions related to COVID-19, and amendments made by O. Reg. 824/21, we will not be hosting an in-person meeting. In-person viewing of the webinar can be arranged at the Lehigh Cement Plant upon request.

**The virtual information session (webinar) will be held on Thursday, August 25<sup>th</sup>, 2022 at 6:00 p.m. to 8:00 p.m.**

To participate in the virtual event, which will be held using Microsoft Teams, please visit the Project website for the link to register for the event. Pre-registration is required.

**[www.LehighPictonALCF.ca](http://www.LehighPictonALCF.ca)**

#### Contact Us

Lehigh values your input on this matter. Please contact our Project Team for more information about this study or to be added to the contact list for future updates:

**E-mail:** [LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)

**Nick Papanicolaou**  
Lehigh Hanson Materials Limited, Picton Plant  
Environmental Manager, Canada  
**Phone:** 613-438-0361

**Jamie McEvoy**  
WSP Golder  
Senior Air Quality Engineer, Project Manager  
**Phone:** 613-592-9600 ext. 3254

If you are unable to attend, information presented at the virtual public meeting will be made available on the Project website.





## Notice of Completion of the Consultation Report

### Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

#### Background

Lehigh Hanson Materials Ltd. (Lehigh), a part of Heidelberg Cement, is undertaking efforts to use Alternative Low Carbon Fuels (ALCFs) to supplement the energy required to make portland cement at their Picton Cement Plant (the Site). ALCFs are in use in many cement plants all over the world and represent a proven technology to reduce greenhouse gas emissions. The use of ALCFs is a key component of Heidelberg Cement's global carbon reduction strategy and diverts non-recyclable materials from landfills. The Site is located at 1370 Hwy 49, Picton Ontario. Lehigh currently operates with Environmental Compliance Approval (ECA) for air and noise, #0073-BHGQHC, issued October 31, 2019.

#### Alternative Low Carbon Fuel Study

Lehigh has prepared an ALCF ECA application under Part II.1 of the Ontario Environmental Protection Act (EPA) to amend the existing ECA, to allow for a Non-Demonstration (Permanent) Project to use ALCFs at the Site, satisfying Ontario Regulation (O. Reg.) 79/15 (as amended by O. Reg. 54/21 and 824/21). As part of the Amendment ECA Application, Lehigh is requesting approval for the following:

- An ALCF daily throughput of up to 200 tonnes per day, which may include the following materials:
  - Construction & Demolition (C&D) Materials; including but not limited to primarily wood material with minor amounts of non-recyclable paper and plastic.
  - Industrial, Commercial, and Institutional (IC&I) Materials; including but not limited to primarily non-recyclable paper, plastic and textiles wood material, and tire fibre and fluff.
  - The combustible fraction of non-recyclable household waste (commonly referred to as Refuse Derived Fuel [RDF]).
  - Discarded treated seed.
- Installation of new conveyance and storage equipment for ALCF at the site using enclosed containers and buildings.

The Site will target approximately 33% thermal replacement by using mixtures of ALCFs to replace petroleum coke and coal.

#### Consultation Report

Lehigh held two public meetings for this project, Public Meeting #1 on April 7, 2022 and Public Meeting #2 on August 25, 2022, in addition to other consultation undertaken to support this Project.

**Lehigh has completed a Consultation Report for this project that is now available to interested parties to view on the Project website: [www.LehighPictonALCF.ca](http://www.LehighPictonALCF.ca)**

The Consultation Report provides a summary of all consultation activities that have been conducted throughout the study including the following:

- An overview of the information that was provided at the public meetings;
- A record of feedback that was received throughout the Project;
- A summary of any discussions that Lehigh had with Indigenous communities regarding the Project;
- A description of what Lehigh did to respond to concerns expressed during the consultation process; and
- Copies of all notices, reports and other materials prepared in support of the Project.

#### ALCF Application to MECP

Lehigh will be submitting the ALCF Application under O. Reg. 79/15 for an Amendment to their current ECA. In addition to the Consultation Report, further information about this study, including materials from Public Meeting #1 and Public Meeting #2, are available on the Project website noted above.

#### Contact Us

Lehigh values your input on this matter. Please contact our Project Team for more information about this study or to be added to the contact list for future updates:

**E-mail:** [LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)

**Nick Papanicolaou**  
Lehigh Hanson Materials Limited, Picton Plant  
Environmental Manager, Canada  
**Phone:** 613-476-8636

**Jamie McEvoy**  
WSP Golder  
Senior Air Quality Engineer, Project Manager  
**Phone:** 613-592-9600 ext. 3254



**APPENDIX B**

# Project Website



# Lehigh Hanson

## Sharing Information with Our Community

### Background

Lehigh Hanson Materials Ltd. (Lehigh), a part of Heidelberg Cement, is undertaking efforts to use Alternative Low Carbon Fuels (ALCFs) to supplement the energy required to make Portland Cement at their Picton Cement Plant (the Site).

ALCFs are in use in many cement plants all over the world and represent a state-of-the-art technology to reduce greenhouse gas emissions. The use of ALCFs is a key component of Heidelberg Cement's global carbon reduction strategy and diverts non-recyclable materials from landfills. The Site is located at 1370 Hwy 49, Picton, Ontario.

### Notice of Public Meeting

Public Meeting / Virtual Meeting #2  
Thursday, August 25, 2022, 6:00 p.m. to 8:00 p.m.

### Contact Us

Lehigh values your input on this matter. Please contact our Project Team for more information about this study or to be added to the contact list for future updates:

[Email: LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)

Nick Papanicolaou  
Lehigh Hanson Materials Limited, Picton Plant  
Environmental Manager, Canada  
Phone: 613-438-0361

Jamie McEvoy  
Golder Associates Ltd.  
Senior Air Quality Engineer, Project Manager  
Phone: 613-592-9600 ext. 3254

### Links

#### Public Meetings

[First Public Meeting – April 7, 2022 – Notice of Intent to Apply/Meeting](#)

[Public Meeting #1 Presentation – April 7, 2022](#)

[Second Public Meeting – August 25, 2022 – Notice of Public Meeting #2](#)

[Public Meeting #2 Presentation – August 25, 2022](#)

**APPENDIX C**

# Public Meeting Materials

# Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

April 7, 2022

## Presentation Etiquette

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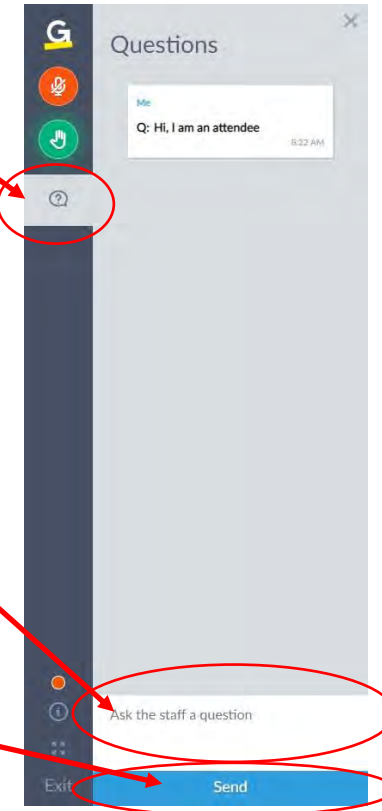
- **Be Patient** – Virtual meetings do not always run as smoothly as planned. We apologize if there are any technical difficulties.
- **Be Respectful** – Listen to and respect other points of view. Lehigh is an inclusive organization. Discriminatory, prejudicial, or hateful comments will not be tolerated.
- **Stay on Topic** – Please keep all questions and comments focused on this Project.
- **We want to hear from you** – please do not be shy!

## How to use Go To Webinar Question Function

Click the “Question” function here.

Type your questions / comments to the Project Team here.

Click the “Send” button to submit your questions / comments.



# Overview of Public Meeting #1

The Lehigh Picton Cement Plant is undertaking efforts to use Alternative Low Carbon Fuels (ALCFs) to supplement fossil fuels for the production of Cement. This meeting is an important part of the ALCF permitting process in accordance with O. Reg. 79/15.

## 1. Picton Cement Plant Overview

- Introduction & Project Team
- Difference between Clinker, Cement and Concrete
- Picton Cement Process, CO<sub>2</sub> and Cement
- Picton Cement Plant Overview
- Picton Cement Plant and the Community

## 2. ALCF Overview & ALCFs for Picton Cement Plant

- O. Reg. 79/15 Overview
- O. Reg. 79/15 Permitting Process and Timeline
- What are ALCFs?
- Waste Hierarchy and how ALCFs fit in
- ALCF Use and Environmental Impact
- Eligible / Ineligible Fuels
- Proposed ALCFs for the Picton Cement Plant

## 3. Sustainability & Climate Change

- Heidelberg Cement Group Sustainability Commitments
- Picton Cement Plant Pathway to Reduce GHGs
- Carbon Dioxide Emission Intensity

## 4. Environmental Report & Proposed Technical Studies

- Stakeholder Engagement and Public Consultation
- Carbon Dioxide Emission Intensity Assessment
- Emission Summary and Dispersion Modelling (ESDM) Report
- Acoustic (Noise) Assessment Report (AAR)



# Introduction

- The Lehigh Picton Cement Plant is currently approved to operate under an Environmental Compliance Approval (ECA) using the following fuels:
  - Coal
  - Petroleum coke (Petcoke)
  - Natural Gas
- Lehigh is applying to use up to 200 tons per day of Alternative Low Carbon Fuels (ALCFs) to reduce the amount of coal and petcoke used at the Facility. ALCFs supports;
  - Lehigh Cements greenhouse gas (GHG) emissions reduction targets,
  - Canada’s 2030 Emission Reduction Plan, and
  - Ontario’s Plan for building a circular economy.
- Lehigh is applying for an ALCF permit in accordance with *O. Reg. 79/15 – Alternative Low Carbon Fuels*
- ALCFs are used throughout the world and are a key component of Lehigh’s parent company, Heidelberg Cement’s [sustainability commitments](#).



# ALCF Permitting Project Team

## Lehigh Team

**Nick Papanicolaou**  
Project Lead  
Environmental Manager  
Lehigh Picton Cement Plant

**Carsten Schraeder**  
Plant Manager  
Lehigh Picton Cement Plant

**Melissa Eaton**  
Quality Control Manager  
Lehigh Picton Cement Plant

**Jasper van de Wetering**  
AFR/CO<sub>2</sub> Manager, Region Canada

**Dave Melcher**  
Manager of Process Support

**Ray Nobles**  
Alternative Fuel Manager, North America  
Northeast & Midwest Regions

## WSP Golder Permitting Support Team

**Jamie McEvoy**  
ALCF ECA Permit Project Manager  
Senior Air Quality Engineer

**Nadia Dabagh**  
Consultation Lead  
Environmental Planner

**Jeremiah Pariag**  
Consultation & Engagement  
Consultation & Engagement Lead

**Sean Capstick**  
Project Director  
Senior Advisor – Climate Change Integration



# Clinker vs Cement vs Concrete

## Clinker

- Manufactured in a high temperature kiln
- Made of mostly *calcined* limestone plus alumina, silica & iron oxide.

## Cement

- Binding element in concrete
- Clinker is milled into a fine powder and blended with limestone, gypsum and other additives to create cement.

## Concrete

- Made of cement, sand, gravel
- Sets and hardens when combined with water
- Used for building: foundations, slabs, patios and masonry



Concrete is the second most used material in the world after water<sup>1</sup>

<sup>1</sup> <https://gccassociation.org/our-story-cement-and-concrete>

# Picton Clinker & Cement Process Overview

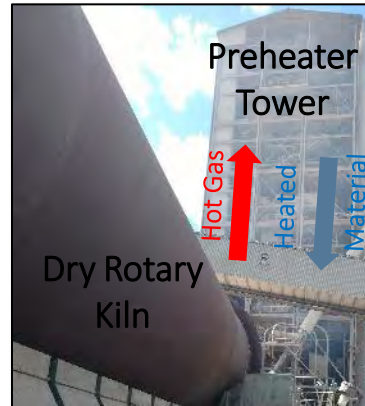
## Raw Material Processing

Limestone from Quarry is crushed and milled with other materials to form the raw meal to feed kiln.



## Raw Meal to Clinker Process

Raw meal is fed through the preheater tower into the rotary kiln. This design promotes energy efficiency and provides a scrubbing effect.



## Clinker to Cement

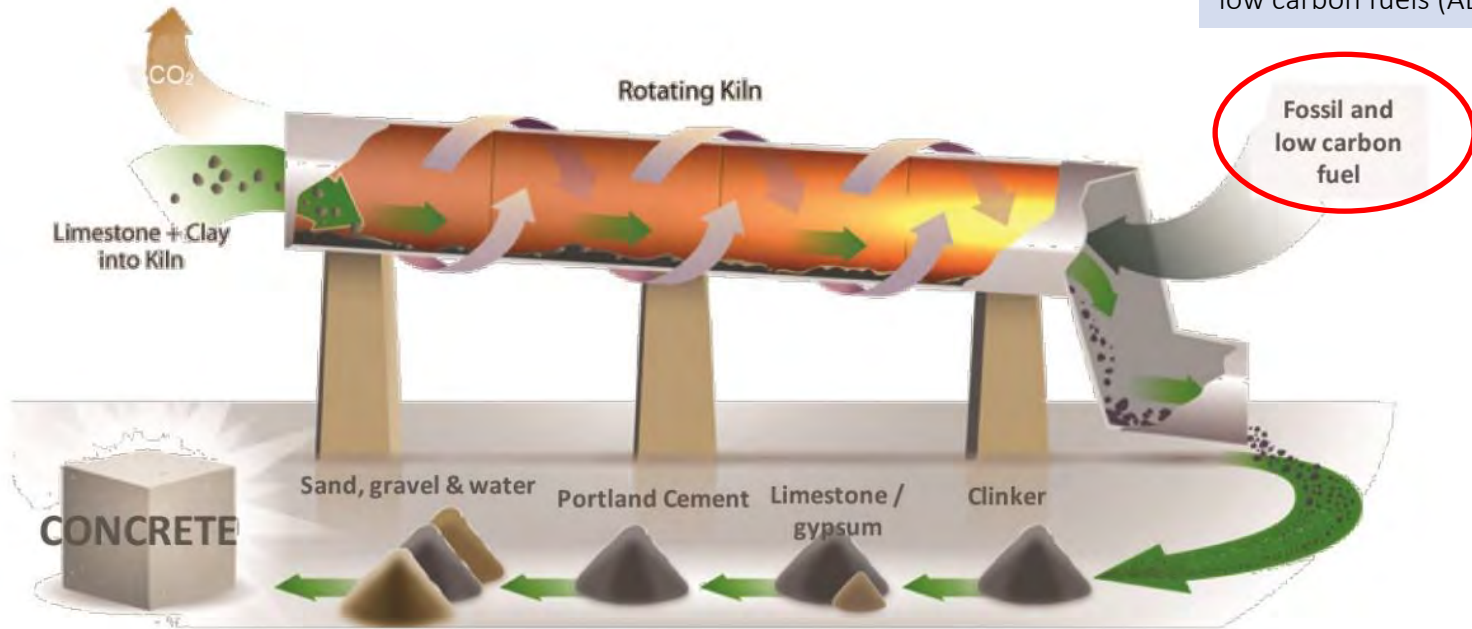
The clinker is cooled and combined with gypsum and limestone in a grinding mill to make cement.



# CO<sub>2</sub> and Cement

2/3 of CO<sub>2</sub> emissions result from calcination of limestone to lime:  
 $\text{CaCO}_3 \rightarrow \text{CaO} + \text{CO}_2$

1/3 of CO<sub>2</sub> emissions result from combustion of fuel and these can be reduced with alternative low carbon fuels (ALCF).



# The Picton Cement Plant: Site Overview

- Location: 1370 Hwy 49, Picton Ontario
- The plant currently operates with ECA for air and noise, #0073-BHGQHC, issued October 31, 2019
- Produces up to 1 million tons of cement
- Includes a limestone quarry on both sides of Hwy 49
- Directly employs 130 workers, technicians, engineers & admin staff, plus local contractors & suppliers.





# The Picton Cement Plant: Site History

1958 Lake Ontario Cement commissions plant with kiln 1 & 2

1964 Kiln 3 commissioned

1976 Kiln 4 commissioned

1986 Ciments Francais/Essroc

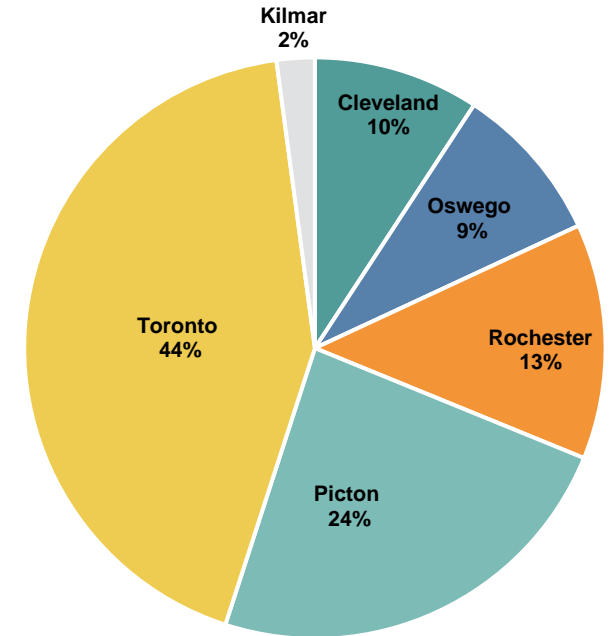
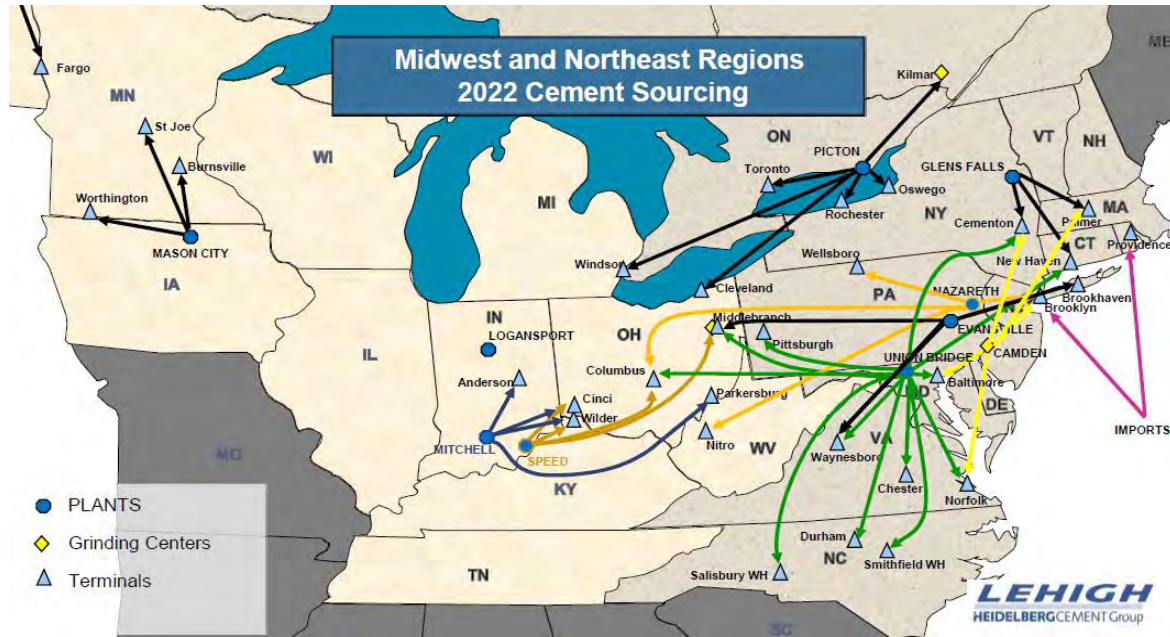
1992 Italcementi/Essroc

2009 Kiln 3 Idled

2017 Heidelberg Cement/Lehigh



# The Picton Cement Plant: Sales and Distribution



## Picton Cement Market

- Embedded into North-East network.
- Picton Cement Plant serves water-based terminals in Toronto, Windsor, Cleveland, Rochester & Oswego as well as land based terminals in Ottawa and Kilmar, Quebec.

# Community Involvement

Lehigh is active in the community:

- Instrumental role in supporting development of local arenas and the sponsorship of many sports teams, free skate sessions
- Sponsorship towards Salvation Army Gift Baskets during holidays, United Way, Regent Theatre, Rotary among others
- Scholarship program for student awards
- Support of local artists, sponsor artist of the year award
- Support the Quinte Conservation donating time and materials to maintain these public spaces

PICTURING OUR COMMUNITY



WELL DESERVED – Members of the Lehigh Cement group in Picton joined at the local Salvation Army on Friday to distribute Thanksgiving Hampers to Prince Edward County families. In total, Lehigh sponsored 60 hampers to ensure local families had a happy holiday. (Jason Parks/Gazette Staff)



BREAK

Questions?



# Overview of Public Meeting #1

## 1. Picton Cement Plant Overview

- Introduction & Project Team
- Difference between Clinker, Cement and Concrete
- Picton Cement Process, CO<sub>2</sub> and Cement
- Picton Cement Plant Overview
- Picton Cement Plant and the Community

## 2. ALCF Overview & ALCFs for Picton Cement Plant

- O. Reg. 79/15 Overview
- O. Reg. 79/15 Permitting Process and Timeline
- What are ALCFs?
- Waste Hierarchy and how ALCFs fit in
- ALCF Use and Environmental Impact
- Eligible / Ineligible Fuels
- Proposed ALCFs for the Picton Cement Plant

## 3. Sustainability & Climate Change

- Heidelberg Cement Group Sustainability Commitments
- Picton Cement Plant Pathway to Reduce GHGs
- Carbon Dioxide Emission Intensity

## 4. Environmental Report & Proposed Technical Studies

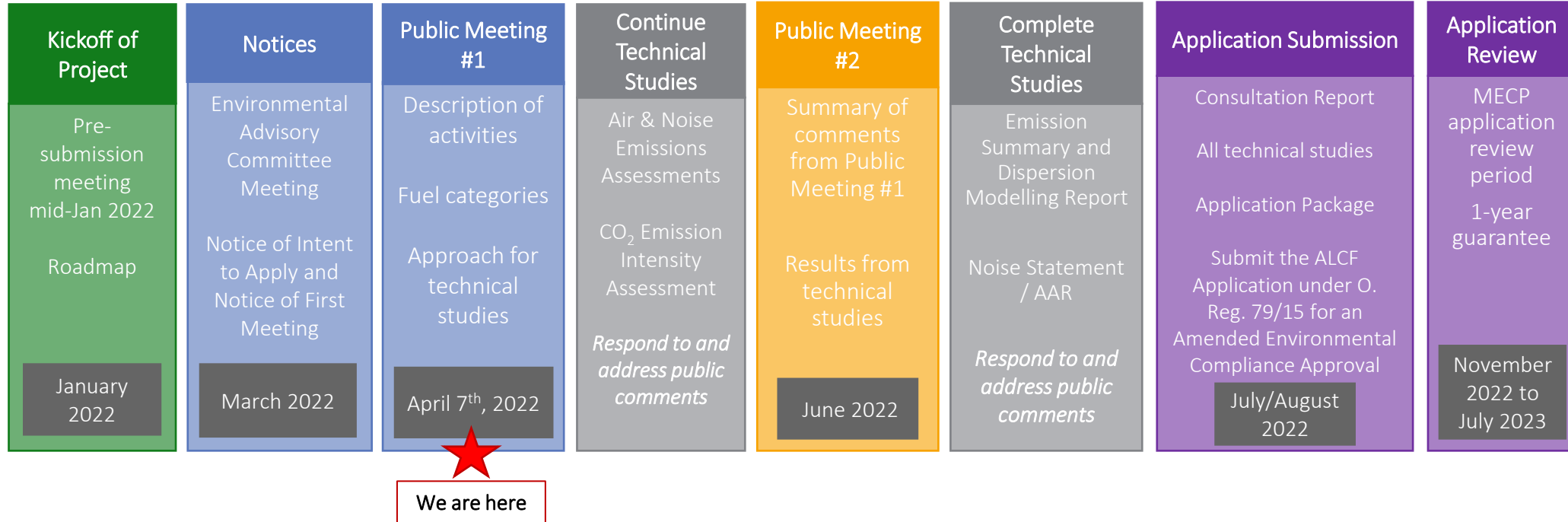
- Stakeholder Engagement and Public Consultation
- Carbon Dioxide Emission Intensity Assessment
- Emission Summary and Dispersion Modelling (ESDM) Report
- Acoustic (Noise) Assessment Report (AAR)

## O. Reg. 79/15 Alternative Low-Carbon Fuels (ALCF)

Highlights of O. Reg. 79/15:

- The regulation defines the framework and controls for facilities that want to use the **ALCFs** in terms of types and quantity of materials that can be used;
- Preparing and distributing a **Notice of Intent to Apply** for an **Amendment ECA Application**;
- Holding at least **two meetings** for members of the public who live in the municipality in which the Site is located;
- A **consultation report** that outlines a description of all consultation activities undertaken as part of the Amendment ECA Application;
- A **Notice of Completion of the Consultation Report** and making the **Consultation Report** available on a website for public review.
- Lehigh Project Website: [www.LehighPictonALCF.ca](http://www.LehighPictonALCF.ca)

## O. Reg. 79/15 ALCF - Permitting Process and Timeline



Lehigh Project Website:

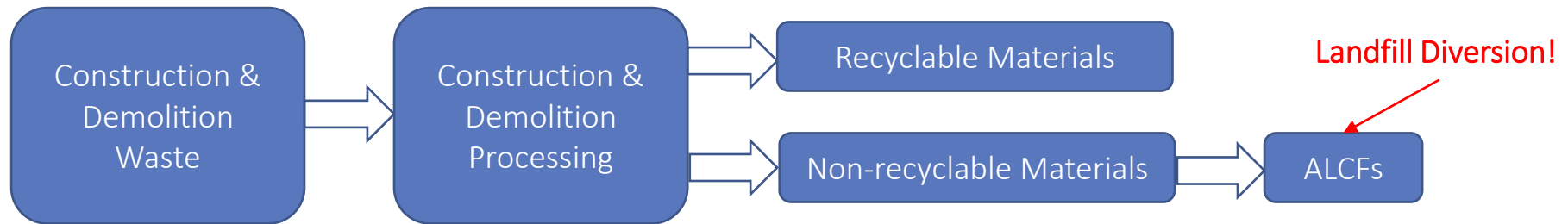
[www.LehighPictonALCF.ca](http://www.LehighPictonALCF.ca)

# What are Alternative Low Carbon Fuels?

Fuels that have a **carbon dioxide emission intensity** less than coal or petroleum coke when combusted, and meet one of the two following descriptions:

1. The fuel
  - Is not derived from or composed of any material set out in **Schedule 1 of O. Reg. 79/15** (The schedule of ineligible fuels)
  - Is wholly derived from or composed of materials that are **biomass or municipal waste** or a combination of both
  - Has a high heat value of at least **10,000 megajoules per tonne** (unless a fuel is wholly derived from or composed of materials that are solid biomass).
2. The fuel is **wholly** derived from or composed of **organic matter**, not including peat or peat derivatives, derived from a plant or micro-organism and grown or harvested for the purpose of being used as a fuel.

## Pathway of an ALCF



# The Waste Hierarchy

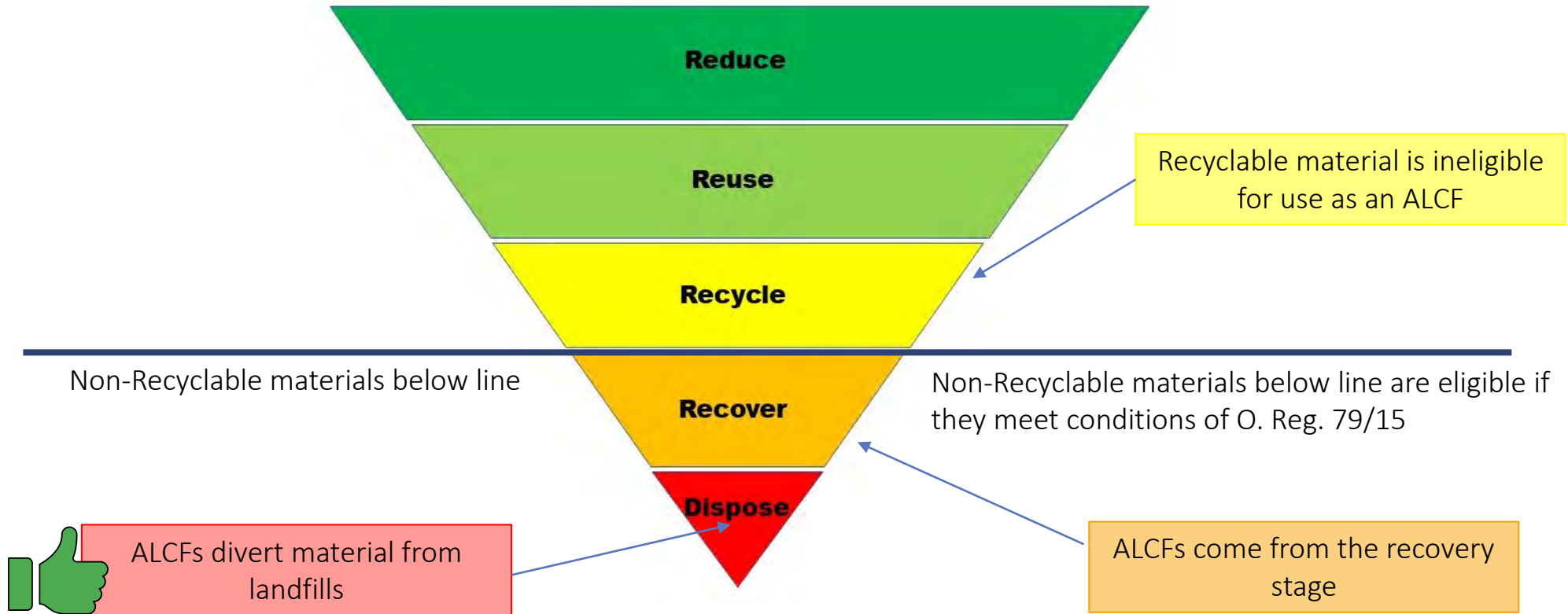
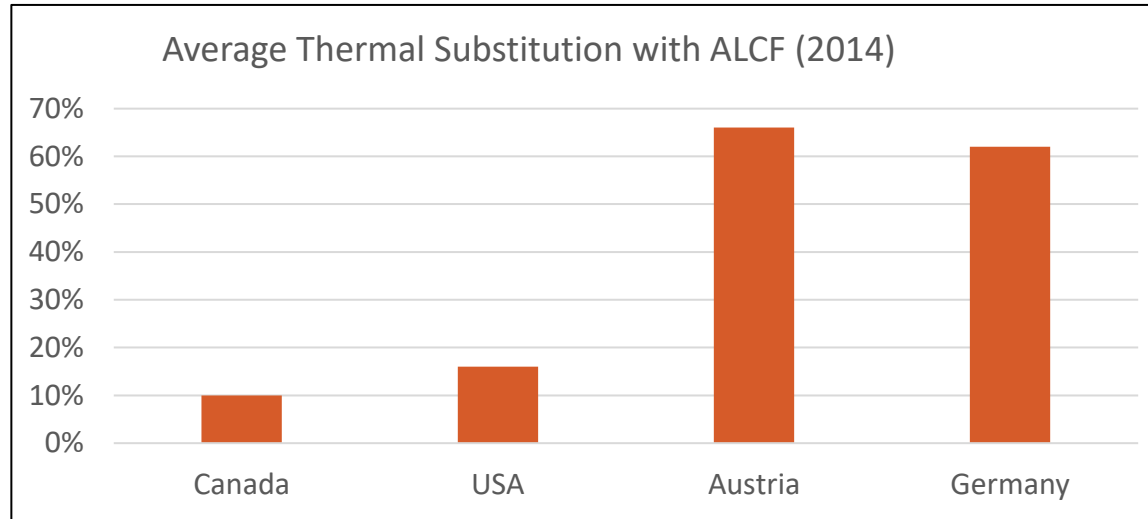


Image modified from: <https://www.epa.gov/smm/sustainable-materials-management-non-hazardous-materials-and-waste-management-hierarchy>

# Alternative Low Carbon Fuels Use and Environmental Impact

There has been a long history of alternative fuels used in cement production around the world<sup>1</sup>



- The European Cement Association estimates that by 2050, 40% of kiln energy could potentially come from traditional sources (e.g., coal and petroleum coke), while 60% of kiln energy could potentially be provided by alternative fuels of which 40% could be biomass. The fuel mix would lead to an overall decrease of 27% in fuel CO<sub>2</sub> emissions<sup>2</sup>
- The December 2021 Made-In-Ontario Environment Plan highlights the need to reduce the amount of waste sent to landfill<sup>3</sup>, The strategy for a Waste-Free Ontario highlights that three quarters of waste is currently sent to landfill and sets forth targets **to improve waste diversion**<sup>4</sup>

<sup>1</sup> The Pembina Institute and Environmental Defence. *Alternative Fuel Use in Cement Manufacturing. Implications, Opportunities and barriers in Ontario*, 2014.

<sup>2</sup> CEMBUREAU, The European Cement Association. *Alternative Fuels*, 2018. <https://lowcarboneconomy.cembureau.eu/5-parallel-routes/resource-efficiency/alternative-fuels/>

<sup>3</sup> MECP, A Made In Ontario Environment Plan. *A Made-in-Ontario Environment Plan* | [ontario.ca](https://ontario.ca)

<sup>4</sup> The Strategy for a Waste-Free Ontario: Building the Circular Economy. *Strategy for a Waste-Free Ontario: Building the Circular Economy* | [ontario.ca](https://ontario.ca)

# Sustainability and CO<sub>2</sub>

On March 29<sup>th</sup>, 2022 Environment & Climate Change Canada (ECCC) released the 2030 Emissions Reduction Plan (ERP). The ERP is a detailed roadmap that includes modeling for reducing the country's emissions 40-45% below 2005 levels by 2030.

ECCC worked closely with the Cement, Lime, and Gypsum subsector and has modeled this sector to reduce emissions country-wide by 49% from 14 MtCO<sub>2</sub>e in 2019 to 8 Mt CO<sub>2</sub>e in 2030.

The **key drivers** of emissions reduction according to the ECCC for heavy industry will be:

- **Carbon Capture, Utilization and Storage (CCUS) deployment**
  - Drive 12.9% of emissions reduction in the country by 2030
- **Uptake in clean fuel and bioenergy**
  - Drive 13.4% of emissions reduction in the country by 2030
  - Canada to develop a plan for **agricultural, forestry, and municipal waste to be used as a clean fuel**

ALCFs



# What fuels are eligible?

## Examples of Ineligible fuels

- O. Reg. 79/15 Schedule 1 defines the ineligible fuels
- Soil composting materials and leaf & yard waste
- Electrical equipment and components
- Tires except tire fluff
- Asbestos and hazardous waste



## Examples of ALCFs

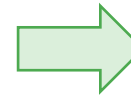
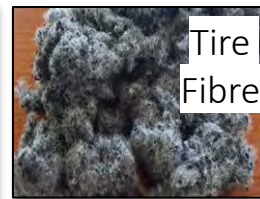
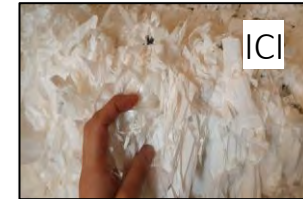
- Non-recyclable plastics & composites
- Construction & Demolition
- Non-recyclable Paper and wood
- Biomass fuels (e.g., sawdust, wood chips, discarded seed)
- Other (e.g., treated wood, shingles and non-recyclable rubber)





## Proposed ALCFs for Picton

- ALCF from Construction and Demolitions (C&D) materials: primarily wood material with minor amounts of non-recyclable paper and plastic
- ALCF from Industrial, Commercial, and Institutional (IC&I) materials: primarily non-recyclable paper, plastic and textiles but including wood material, and tire fibre and fluff
- ALCF from the combustible fraction of non-recyclable household waste – Refuse Derived Fuel (RDF)
- Discarded treated seed



BREAK

Questions?

# Overview of Public Meeting #1

## 1. Picton Cement Plant Overview

- Introduction & Project Team
- Difference between Clinker, Cement and Concrete
- Picton Cement Process, CO<sub>2</sub> and Cement
- Picton Cement Plant Overview
- Picton Cement Plant and the Community

## 2. ALCF Overview & ALCFs for Picton Cement Plant

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# Heidelberg Cement Group Sustainability Commitments

## Reducing Intensity

## Mitigating remaining emissions

### Medium-term: 2020-2030

- 🌐 **Reduction of CO<sub>2</sub> content in clinker**
  - Further improve energy efficiency
  - Increase use of alternative fuels, raw materials, and new binder concepts
- 🌐 **Reduction of CO<sub>2</sub> content in cement and concrete**
  - Use clinker with lower CO<sub>2</sub> content and secondary cementitious materials
  - Optimise concrete mixes through new cement types

- 🌐 **Projects for CO<sub>2</sub> capture and usage**
  - Process-integrated CO<sub>2</sub> capture
  - Recarbonation of recycled concrete
  - Use of CO<sub>2</sub> in circular economy (e.g. chemical products)

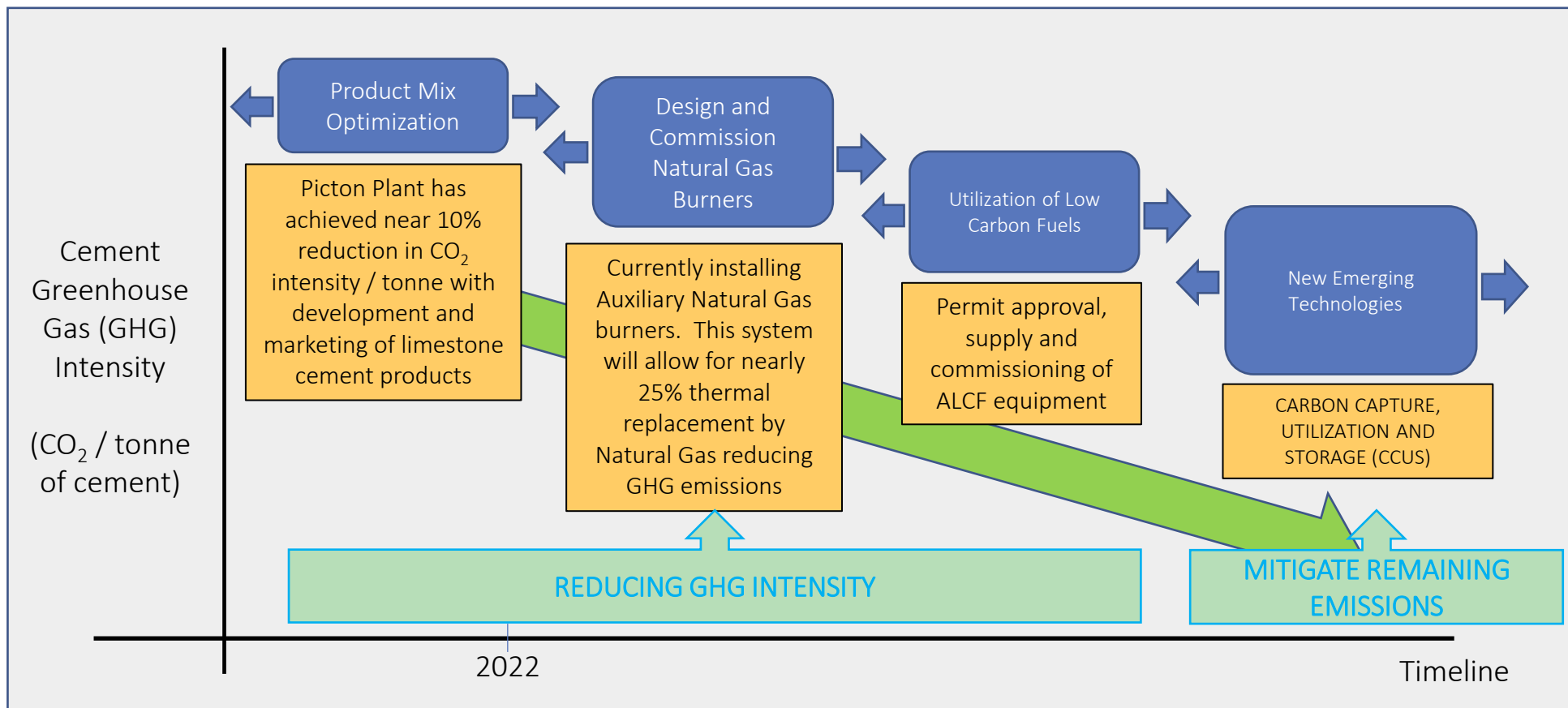
### Long-term: 2030-2050

- 🌐 **Continued R&D into improving processes and energy efficiency**
- 🌐 **Alternative cementitious materials**
- 🌐 **Increasing variety of low-carbon / zero-carbon products**
- 🌐 **Hydrogen as a fuel & kiln electrification**

- 🌐 **Long-term R&D efforts** to support new technologies, e.g. process-integrated CO<sub>2</sub> capture, recarbonisation of recycled concrete
- 🌐 **Rollout of new technologies in industrial scale**

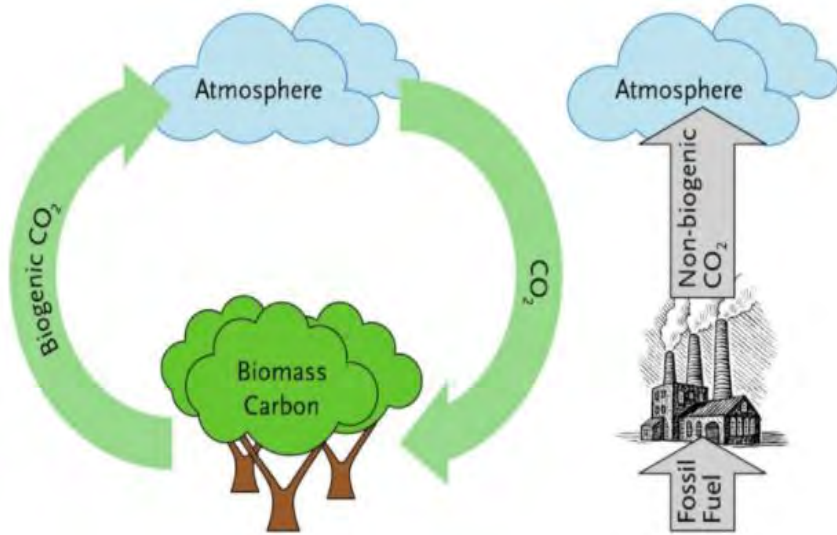
**An adequate political framework is the prerequisite for successful decarbonisation.**

# Picton CO<sub>2</sub> RoadMap – Pathway to Reduce GHGs



# Carbon Dioxide Emission Intensity

ALCFs result in lower CO<sub>2</sub> emissions!



CO <sub>2</sub> Intensities of Typical Kiln Fuels			
	total	% carbon	non-Bio
	kg CO <sub>2</sub> /GJ	biogenic	kg CO <sub>2</sub> /GJ
Coal	96.0	0.0	96.0
Pet Coke	92.8	0.0	92.8
Plastics	83.5	3.0	81.0
Tire Fibre	83.9	27.8	60.6
Natural Gas	56.0	0.0	56.0
ICI RDF	96.6	47.9	50.3
MSW RDF	84.8	50.0	24.4
C&D RDF	99.9	87.3	12.7
Wood Waste	100.6	100	0.0
Seed Waste	100.0	100	0.0

- Carbon dioxide (CO<sub>2</sub>) emission intensities allows different fuel types to be compared on their GHG emissions emitted to atmosphere
- Fuels with higher biomass content emit less non-biogenic CO<sub>2</sub>.

Source: Fossil vs biogenic CO<sub>2</sub> emissions | Bioenergy (ieabioenergy.com)

BREAK

Questions?



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# Stakeholder Engagement and Public Consultation

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Stakeholder Engagement and Public Consultation is a key component of ALCF.

The Project Team will engage in an array of consultation and engagement activities for this project with the objective of gathering input and feedback from Indigenous communities and stakeholders.

The consultation plan outreach includes:

- **Indigenous Communities:** Mohawks of the Bay of Quinte, Kawartha Nishnawbe, Alderville First Nation, Curve Lake First Nation, Hiawatha First Nation, Mississaugas of Scugog Island First Nation
- **Elected Officials, Member(s) of Parliament, Provincial Parliament and Municipal and Regional Councillors of Prince Edward County** and various **Municipal staff members**
- **Provincial Agencies** including Ministry of the Environment, Conservation and Parks, Indigenous Affairs, Transportation, Quinte Conservation
- **Federal Agencies** including Fisheries and Oceans Canada, Environment Canada, Transport Canada

Lehigh appreciates the opportunity to meet with the community. Synergies between municipalities, stakeholders, public and private sector are explored. Through this, development of the circular economy is promoted and a holistic approach to improving the environment is achieved.

# Carbon Dioxide Emission Intensity Assessment

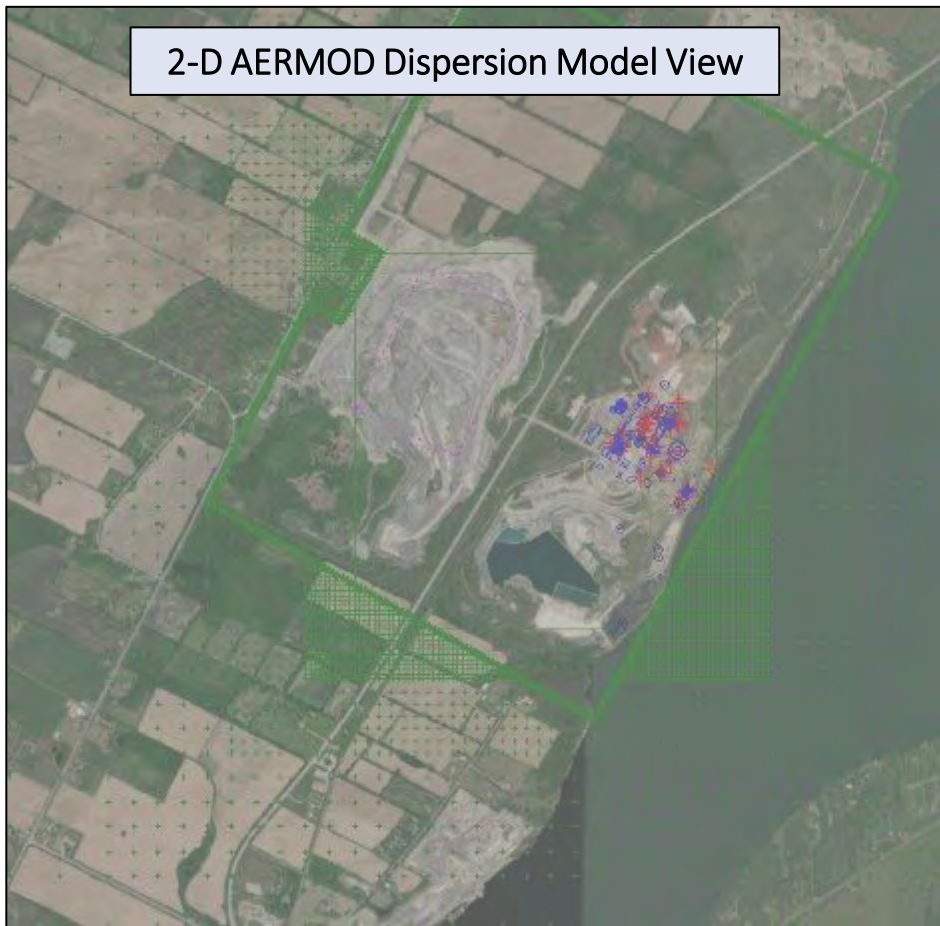
ALCFs result in lower CO<sub>2</sub> emissions!

- The carbon dioxide intensity report is a requirement of O. Reg. 79/15 and compares the CO<sub>2</sub> emission intensity of coal and petcoke with the proposed ALCFs
- ALCFs must meet the requirements of O. Reg. 79/15:
  - Meet the Minimum Heat Value
  - Have a lower CO<sub>2</sub> intensity than coal / petcoke

CO <sub>2</sub> Intensities of Typical Kiln Fuels			
	total	% carbon	non-Bio
	kg CO <sub>2</sub> /GJ	biogenic	kg CO <sub>2</sub> /GJ
<b>Coal</b>	<b>96.0</b>	<b>0.0</b>	<b>96.0</b>
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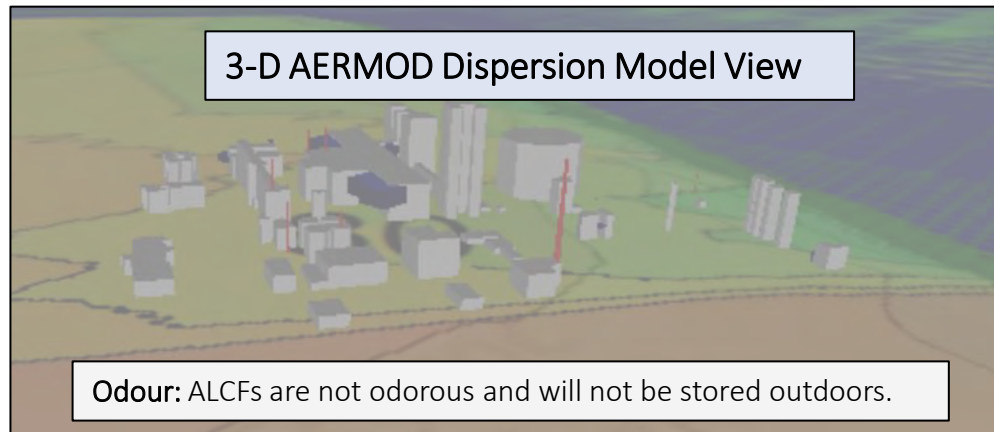
Public Meeting # 2 will highlight the results of the Laboratory testing of the proposed ALCFs

# Emission Summary and Dispersion Modelling (ESDM) Report

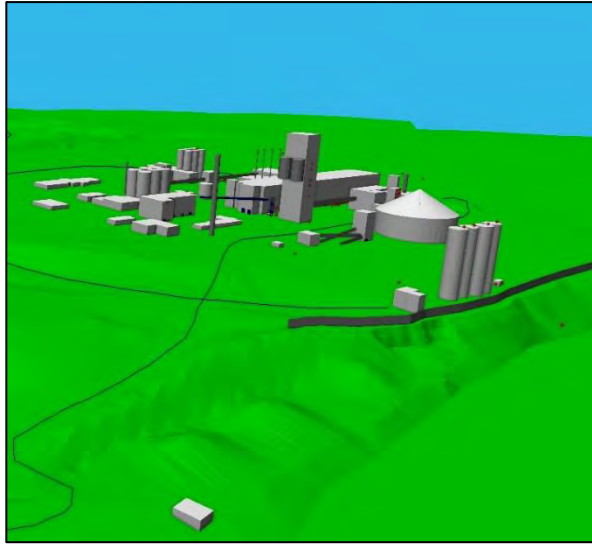


- An ESDM is a requirement of the Lehigh Environmental Compliance Approval. O.Reg. 419/05 - Local Air Pollution, describes the modeling requirements and compliance limits.

**Public Meeting # 2 will highlight the results  
the Lehigh Picton ESDM with ALCF**



# Acoustic (Noise) Assessment Report



## Compliance with Ministry Noise Limits (NPC 233 and NPC 300)

- The Picton Cement Plant is required to meet the Ministry noise limits at neighbouring receptors and maintain an up-to-date Acoustic Assessment Report (AAR)
- The AAR assesses the combined noise impacts, from all activities on-site, at receptors using a 3-D noise model
- The Picton Cement Plant is currently working through a Noise Abatement Action Plan (NAAP) to reduce noise levels implementing improvements annually to existing equipment.

## Public Meeting # 2 will highlight the results of the AAR including ALCF.

- Any potential noise sources from truck deliveries and ALCF conveyance equipment will be assessed and if significant added to the noise model
- Based on Lehigh's experience with other ALCF projects, sources of noise from ALCF project additions are not expected to be acoustically significant.



# We want to hear from you!

## How can you participate in this project?

- Provide comments directly via email at: [LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)
- The Project Team is requesting comment by **May 7<sup>th</sup>, 2022**.
- Visit our website at [www.LehighPictonALCF.ca](http://www.LehighPictonALCF.ca) where all notices and presentation materials will be made available

**Nick Papanicolaou**

Lehigh Hanson  
Materials Limited,  
Picton Plant  
Environmental  
Manager, Canada

**Nadia Dabagh**

WSP Golder  
Consultation Lead,  
Environmental  
Planner

**Jamie McEvoy**

WSP Golder  
Project Manager,  
Senior Air Quality  
Engineer



# Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

August 25, 2022

## Presentation Etiquette

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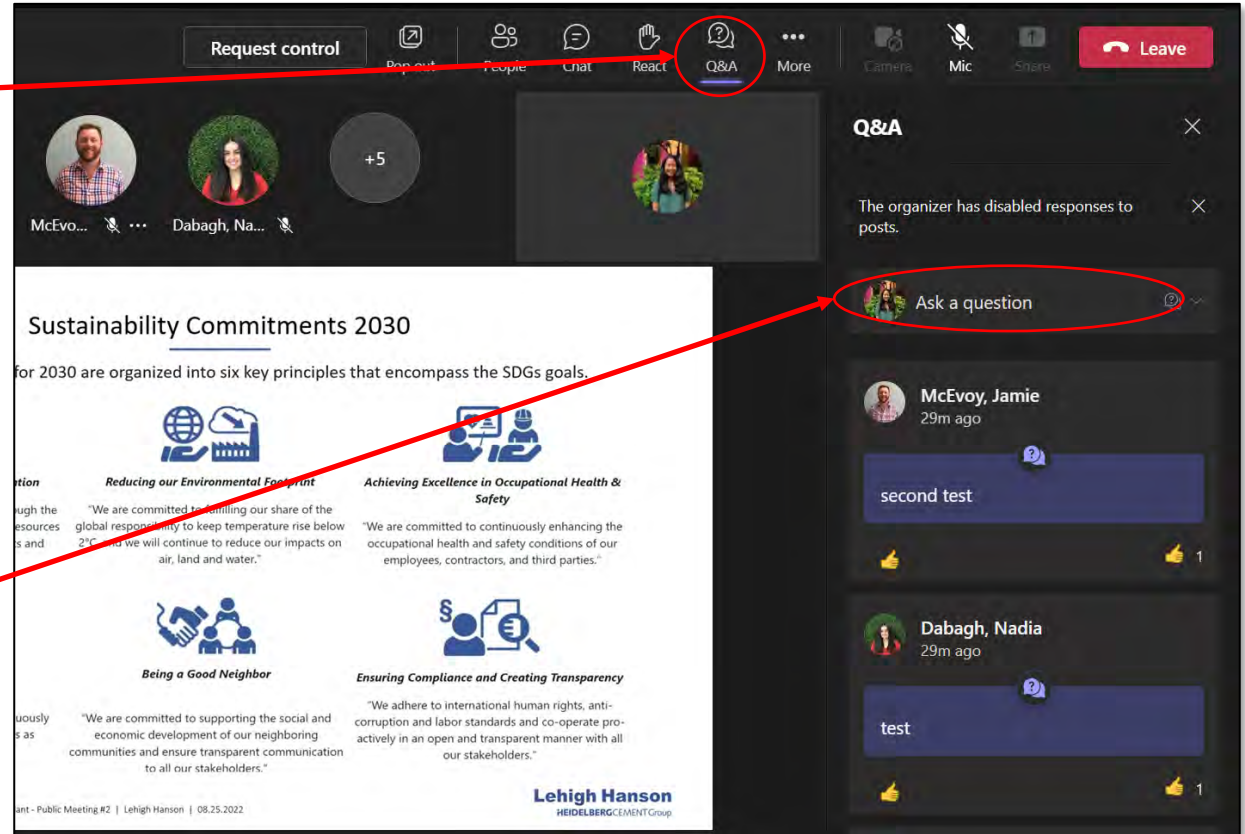
- **Be Patient** – Virtual meetings do not always run as smoothly as planned. We apologize if there are any technical difficulties.
- **Be Respectful** – Listen to and respect other points of view. Lehigh is an inclusive organization. Discriminatory, prejudicial, or hateful comments will not be tolerated.
- **Stay on Topic** – Please keep all questions and comments focused on this Project.
- **We want to hear from you** – please do not be shy!

# How to use Microsoft Teams Question & Answer (Q&A) Function

Click the “Q&A” function here.

Click the “Ask a question” and start typing your questions / comments.

Click “Post” to submit.





# Overview of Public Meeting #2

The Lehigh Picton Cement Plant is undertaking efforts to use Alternative Low Carbon Fuels (ALCFs) to supplement fossil fuels for the production of cement. This meeting is an important part of the ALCF permitting process in accordance with O. Reg. 79/15.

## 1. Background

- Introduction & Project Team
- O. Reg. 79/15 Permitting Process and Timeline
- Clinker, Cement and Concrete
- Lehigh Picton Cement and the Environment
- HeidelbergCement Sustainability

## 2. Public Meeting #1 Summary

- Public Meeting #1 Summary
- Public Meeting #2 Overview

## 3. Proposed ALCFs & Current Compliance

- ALCFs Use in Cement Plants in Ontario
- Waste Hierarchy and how ALCFs fit in
- Proposed ALCFs for the Picton Cement Plant
- Anticipated Supply of ALCFs
- Current vs Future Operations with ALCFs
- Conceptual Drawings of Storage & Conveyance

## 4. Sustainability & Climate Change

- Federal, Provincial and Cement Association Targets
- Canada's Emission Reduction Plan
- Picton CO<sub>2</sub> Roadmap – Pathway to Reduce GHGs
- Carbon Dioxide Emission Intensity Assessment

## 5. Results of Technical Studies & Next Steps

- ALCF Compliance & ECA Application
- O. Reg. 419/05 - ESDM Report
- Kiln Emissions
- Assessment of Emissions from use of ALCF
- Process Controls/Interlocks
- Acoustic (Noise) Assessment Report (AAR)
- Additional Study Considerations
- Next Steps: Consultation Report & ECA Application

# Introduction

The Lehigh Picton Cement Plant is currently approved to operate under an Environmental Compliance Approval (ECA) using the following fuels:

- Coal  *widely used, but high in carbon = high GHG emission* 
- Petroleum coke (Petcoke)
- Natural Gas

Lehigh is applying to use up to **200 tonnes per day of Alternative Low Carbon Fuels (ALCFs)** to reduce the amount of coal and petcoke used at the Facility. ALCFs supports:

- Lehigh Cements greenhouse gas (GHG) emissions reduction targets,
- Canada's 2030 Emission Reduction Plan, and
- Ontario's Plan for building a circular economy.

ALCFs are used throughout the world and are a key component of Lehigh's parent company, Heidelberg Cement's [sustainability commitments](#).

Today we are here to share the progress on the project since the first public meeting in April 2022.



# ALCF Permitting Project Team

## Lehigh Team

**Nick Papanicolaou**  
Project Lead  
Environmental Manager  
Lehigh Picton Cement Plant

**Carsten Schraeder**  
Plant Manager  
Lehigh Picton Cement Plant

**Melissa Eaton**  
Quality Control Manager  
Lehigh Picton Cement Plant

**Jasper van de Wetering**  
AFR/CO<sub>2</sub> Manager, Region Canada

**Dave Melcher**  
Manager of Process Support

**Ray Nobles**  
Alternative Fuel Manager, North America  
Northeast & Midwest Regions

## WSP Golder Permitting Support Team

**Jamie McEvoy**  
ALCF ECA Permit Project Manager  
Senior Air Quality Engineer

**Nadia Dabagh**  
Consultation Lead  
Environmental Planner

**Sarah Asselstine**  
Senior Planner /  
Engagement Specialist  
Facilitator

**Sean Capstick**  
Project Director  
Senior Advisor – Climate  
Change Integration

## O. Reg. 79/15 ALCF - Permitting Process and Timeline



Lehigh Project Website:

[www.LehighPictonALCF.ca](http://www.LehighPictonALCF.ca)

# Clinker vs Cement vs Concrete

## Clinker

- Manufactured in a high temperature kiln
- Made of mostly *calcined* limestone plus alumina, silica & iron oxide.



## Cement

- Binding element in concrete
- Clinker is milled into a fine powder and blended with limestone, gypsum and other additives to create cement.



## Concrete

- Made of cement, sand, gravel
- Sets and hardens when combined with water
- Used for building: foundations, slabs, patios and masonry

Concrete is the second most used material in the world after water<sup>1</sup>

<sup>1</sup> <https://gccassociation.org/our-story-cement-and-concrete>

# Picton Clinker & Cement Process Overview

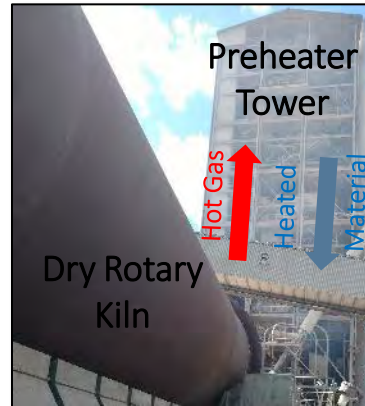
## Raw Material Processing

Limestone from Quarry is crushed and milled with other materials to form the raw meal to feed kiln.



## Raw Meal to Clinker Process

Raw meal is fed through the preheater tower into the rotary kiln. This design promotes energy efficiency and provides a scrubbing effect.



## Clinker to Cement

The clinker is cooled and combined with gypsum and limestone in a grinding mill to make cement.

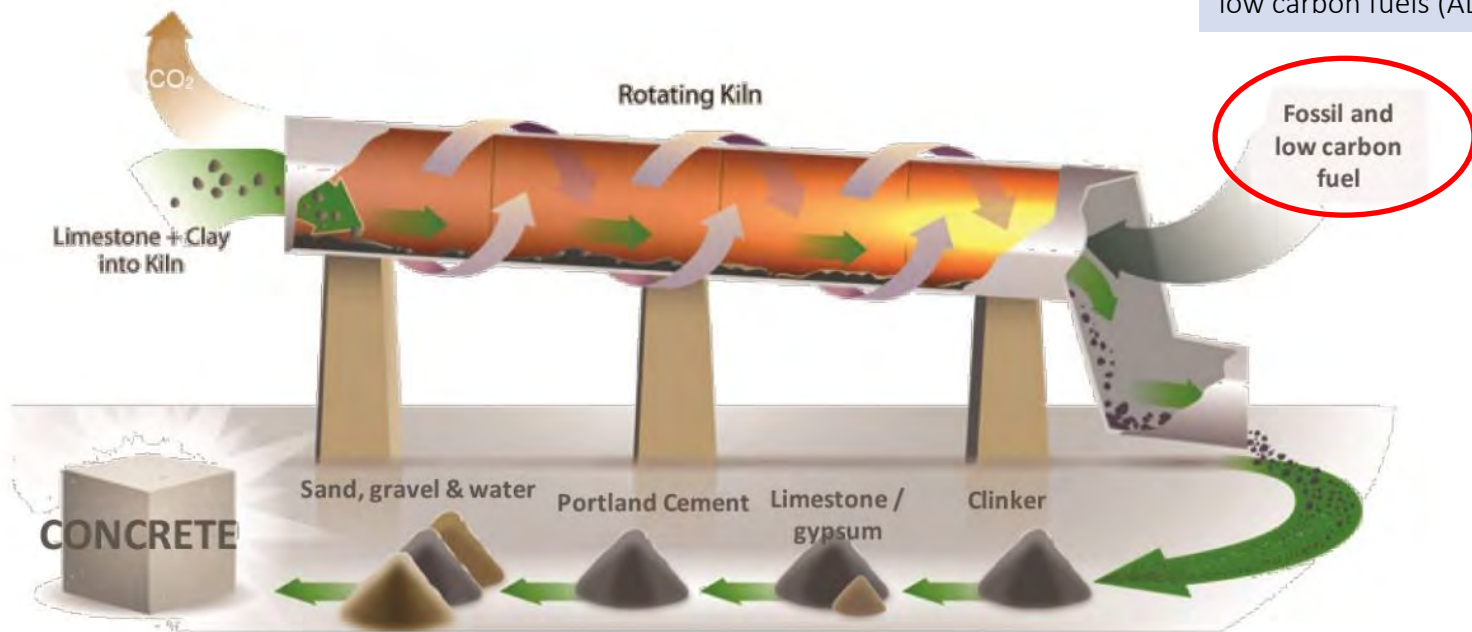




# CO<sub>2</sub> and Cement

2/3 of CO<sub>2</sub> emissions result from calcination of limestone to lime:  
 $\text{CaCO}_3 \rightarrow \text{CaO} + \text{CO}_2$

1/3 of CO<sub>2</sub> emissions result from combustion of fuel and these can be reduced with alternative low carbon fuels (ALCF).





# Sustainability Commitments 2030

The Sustainability Commitments for 2030 encompass the SDGs goals.



## ***Driving Economic Strength and Innovation***

"We will ensure sustainable profitability through effective management of all processes and resources and the continuing innovation of product and services."



## ***Driving Excellence in Occupational Health & Safety***

"We are committed to continuously enhancing the occupational health and safety conditions of our employees, contractors, and third parties."



**By 2050 at the latest, we want to be carbon neutral across our entire product portfolio and achieve "Net Zero" emissions.**

"We are committed to increasing the use of alternative resources as substitutes for natural raw materials."

"We are committed to the economic development of our neighboring communities and ensure transparent communication to all our stakeholders."

"We are committed to actively in an open and transparent manner with all our stakeholders."

# Sustainability Commitments 2030

The Lehigh Picton plant embraces the key Sustainable Development Goals and strives to ensure our products are competitive in the marketplace, we foster the conditions for continuous improvement, and ensure transparent communication as we seek to reduce GHG emissions and work with our community partners.

With this, we appreciate those who attended Public Meeting #1, we thank you for the comments and recommendations received thus far and look forward to working with our community on the ALCF and future projects.



A local company who cares about their employees and the communities where they live are cementing that commitment with a healthy donation.

BREAK

Questions?

# Public Meeting #2 Agenda

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# Summary of Public Meeting #1 Comments

Kickoff of Project	Notices	Public Meeting #1	Continue Technical Studies
Pre-submission meeting mid-Jan 2022	Environmental Advisory Committee Meeting	Description of activities	Air & Noise Emissions Assessments
Roadmap	Notice of Intent to Apply and Notice of First Meeting	Fuel categories	CO <sub>2</sub> Emission Intensity Assessment
January 2022	March 2022	Approach for technical studies	<i>Respond to and address public comments</i>
		April 7 <sup>th</sup> , 2022	

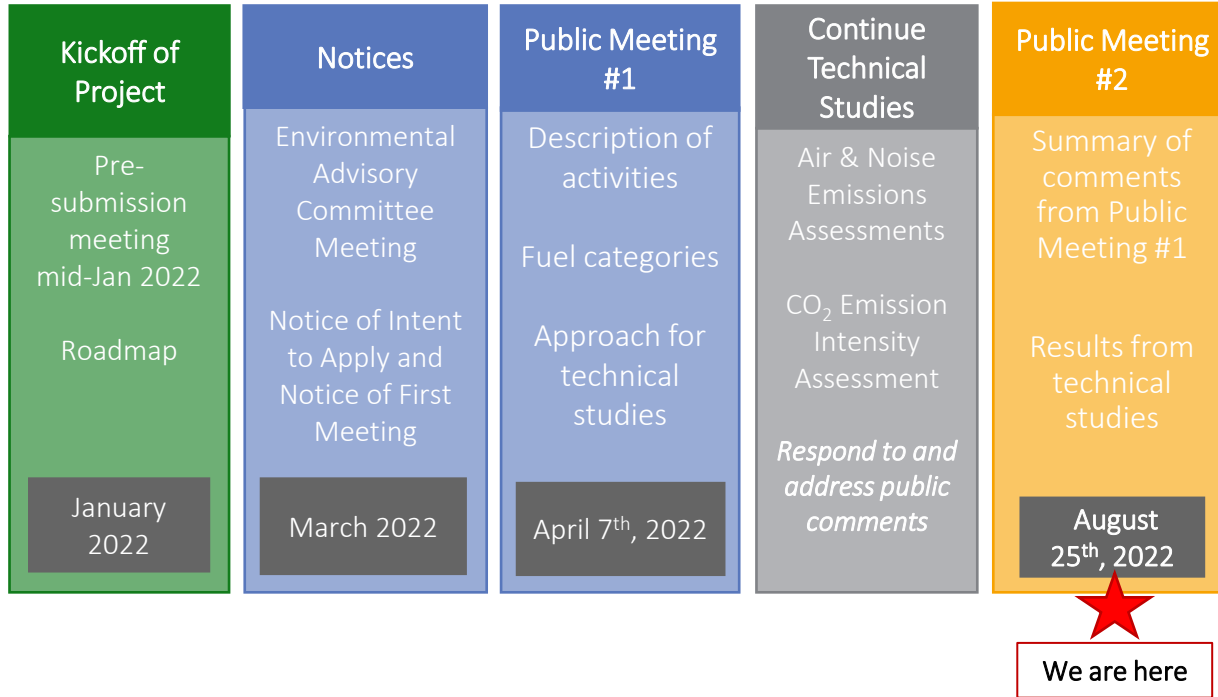
**All questions and comment responses will be documented in the Consultation Report that will be made publicly available on the Project website prior to the submission of the ECA Application.**

- **84 written comments / questions** were submitted during Public Meeting #1 via the GoToWebinar Chat function
- Comments / questions submitted to the Project Team email:
  - **Fourteen (14) prior to Public Meeting #1:**
    - Members of the Public
    - Mississaugas of Scugog Island First Nation
    - Prince Edward County
    - Prince Edward County Conservancy
  - **Nine (9) following Public Meeting #1:**
    - Members of the Public
    - Mississaugas of Scugog Island First Nation
    - Curve Lake First Nation
    - Ministry of Tourism, Culture and Sport (MTCS)
    - Prince Edward County Conservancy
- The Project Team held individual meetings with the following:
  - Environmental Advisory Committee, Prince Edward County – March 1, 2022
  - Prince Edward County Conservancy – April 7, 2022
  - Mississaugas of Scugog Island First Nation – April 22, 2022

# What We Heard at Public Meeting #1

Theme	Project Team Response
Opportunity to comment on the studies conducted in support of this Project	<p>The technical studies will be uploaded to the Project Website prior to the ECA Application.</p> <p>Discussed later on this Public Meeting during the discussion on the technical studies results – Slides 34-52</p>
ALCF transportation and storage to/at the Lehigh Picton Plant	<p>Discussed later on this Public Meeting during the discussion on the conceptional engineering design of the storage / conveyance system – Slides 25 and 28</p>
Impact on Highway 49 with additional trucks transporting ALCFs	<p>Discussed later on this Public Meeting during the discussion on the traffic impact study – Slide 52</p>
Greenhouse gas reduction	<p>Discussed in detail previously on Slides 35 to 36</p>
Are there potential impacts to water / air?	<p>Discussed later on this Public Meeting during the discussion on the technical studies results – Slides 35 to 47</p>

## Purpose of Public Meeting #2



- Provide a summary of the comments received from Public Meeting #1
- Provide an overview and hear feedback on the Project progression since Public Meeting #1
- Provide an overview of the technical studies that have been prepared and the results of these studies

Lehigh Project Website:

[www.LehighPictonALCF.ca](http://www.LehighPictonALCF.ca)



BREAK

Questions?

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## 1. Background

- Introduction & Project Team
- O. Reg. 79/15 Permitting Process and Timeline
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- HeidelbergCement Sustainability

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- Federal, Provincial and Cement Association Targets
- Canada's Emission Reduction Plan
- Picton CO<sub>2</sub> Roadmap – Pathway to Reduce GHGs
- Carbon Dioxide Emission Intensity Assessment

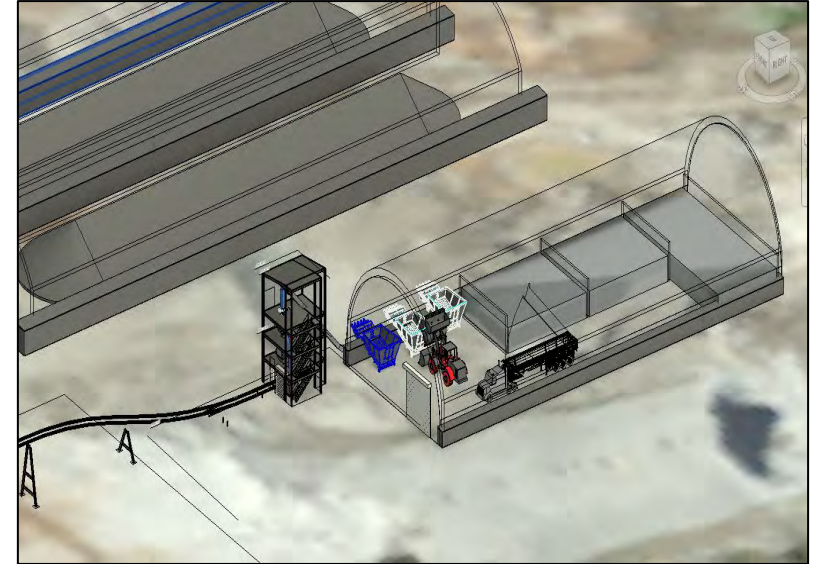
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# ALCFs use in Cement Plants in Ontario

Five grey (Portland) cement plants currently operate in Ontario

- *Lehigh Picton – seeking approval for the use of ALCFs of up to 200 tpd*
- St Marys Cement Bowmanville: permitted to use 400 tpd of construction, renovation and demolition waste, biomass and non-recyclable plastics and paper fibre/wood/plastic composites;
- St. Marys Cement St. Marys: seeking approval to use 175 tpd of construction and demolition by-products (shredded wood), non-recyclable plastics and paper fibre/wood/plastic composites, and non-tire derived rubber materials
- Lafarge Bath: local supplies such as construction and demolition site debris (wood based), railway ties, and other energy containing materials that cannot be recycled
- CRH (Mississauga): no formal application at this time.



# The Waste Hierarchy

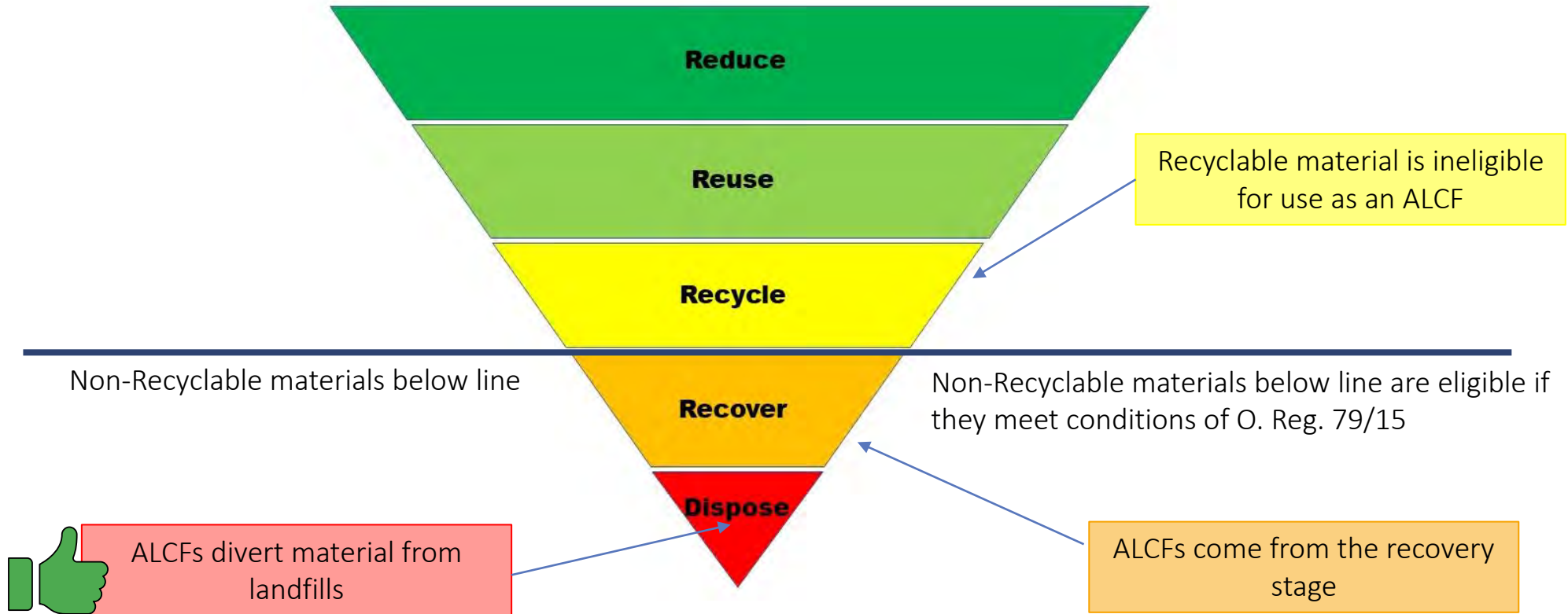
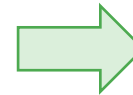
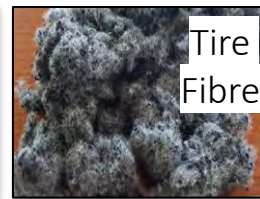
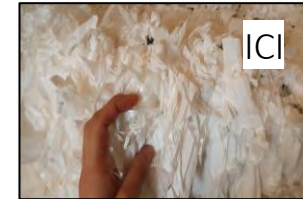


Image modified from: <https://www.epa.gov/smm/sustainable-materials-management-non-hazardous-materials-and-waste-management-hierarchy>

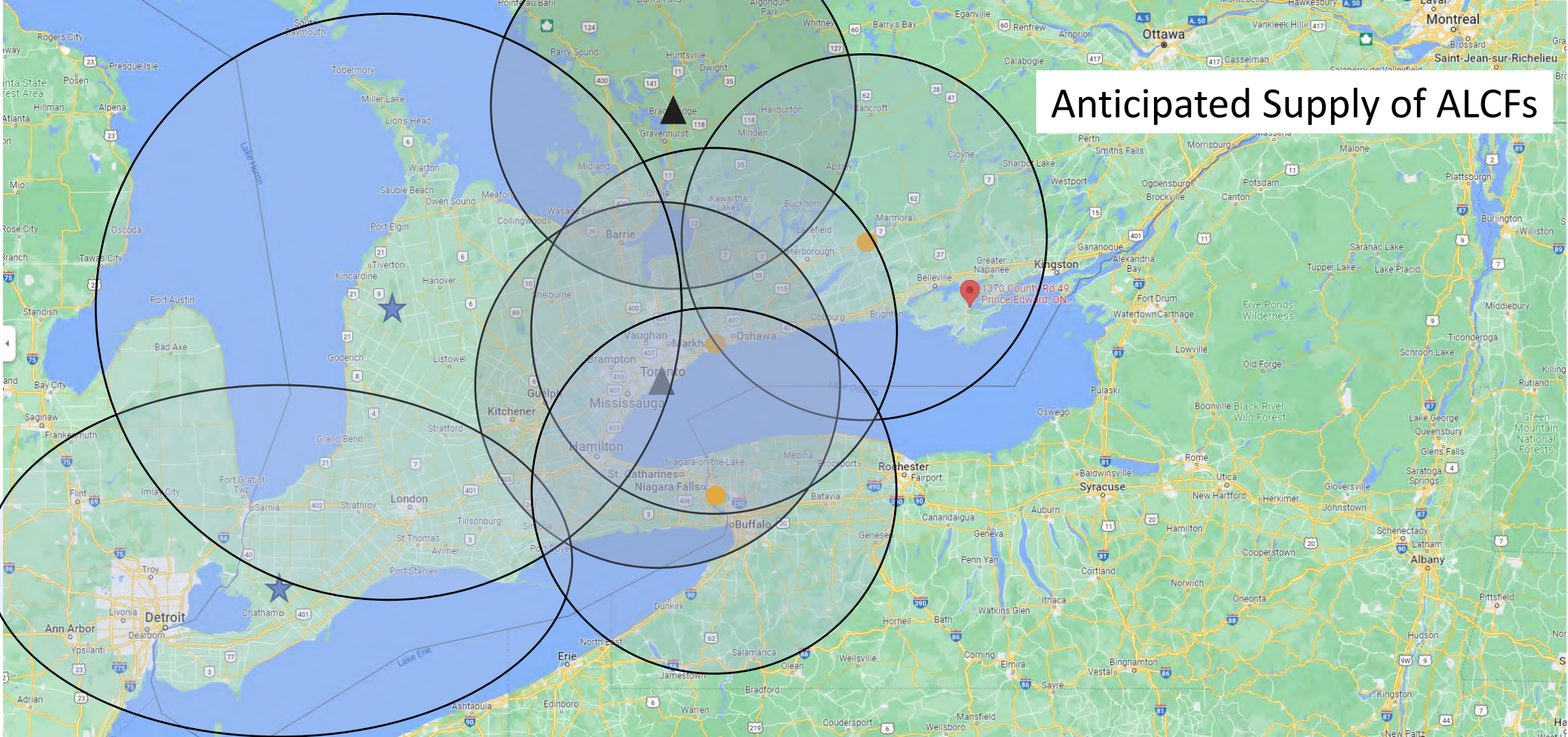
## Proposed ALCFs for Picton

- ALCF from Construction and Demolition (C&D) materials: primarily wood material with minor amounts of non-recyclable paper and plastic
- ALCF from Industrial, Commercial, and Institutional (IC&I) materials: primarily non-recyclable paper, plastic and textiles but including wood material, and tire fibre and fluff
- ALCF from the combustible fraction of non-recyclable waste – Refuse Derived Fuel (RDF)
- Discarded treated seed





# Anticipated Supply of ALCFs



## Legend



Lehigh Picton Cement Plant



Discarded Treated Seed



Industrial, Commercial, and Institutional (IC&I)



Construction and Demolition (C&D)

# Current vs Future Operations with ALCFs

## Current Operations at Picton

### ***Material Receiving & Process***

- Conventional Fuels arrive via boat and NG pipeline
- Some Raw materials arrive via truck

### ***Compliance***

- Continued compliance with all provincial and federal regulations including O. Reg. 419/05 air limits.
- Dust Best Management Practices Plan (BMPP)
- Noise Abatement Action Plan (NAAP)
- Immediate response and follow-up on complaints

### ***Monitoring***

- Kiln 4 and Kiln 4 Bypass CEMS
- Annual Source Testing

## Differences with Future Operations at Picton with ALCFs

### ***Material Receiving & Process***

- **Reduced** amount Conventional Fuels arrive via boat due to ALCF usage and increase in NG
- **Increase** in trucks arriving with ALCFs
- New Storage Facility and conveyance equipment
- Increased fulltime employment for ALCF use

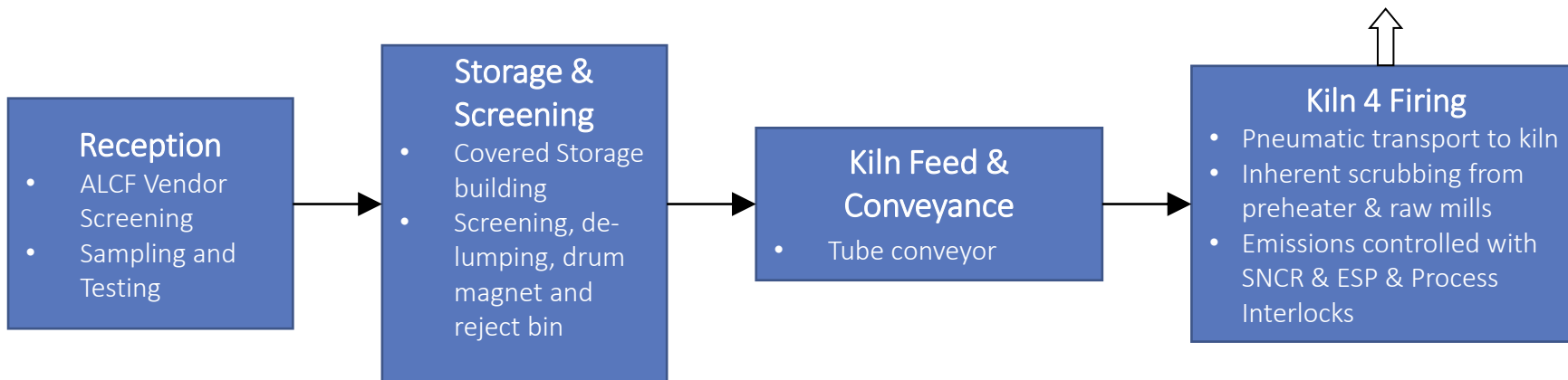
### ***ECA Compliance***

- New requirements related to ALCFs under O. Reg. 79/15
  - Fuel Handling & Testing Manual, Fuel Material QA/QC
  - Increase in source testing requirements under O. Reg. 79/15

***\*The above differences are in addition to the current operations.***



# ALCF Material Handling Process Flow Diagram



- ALCFs Handling Procedures and Testing Manual will be relied on to ensure fuels are acceptable prior to receipt.

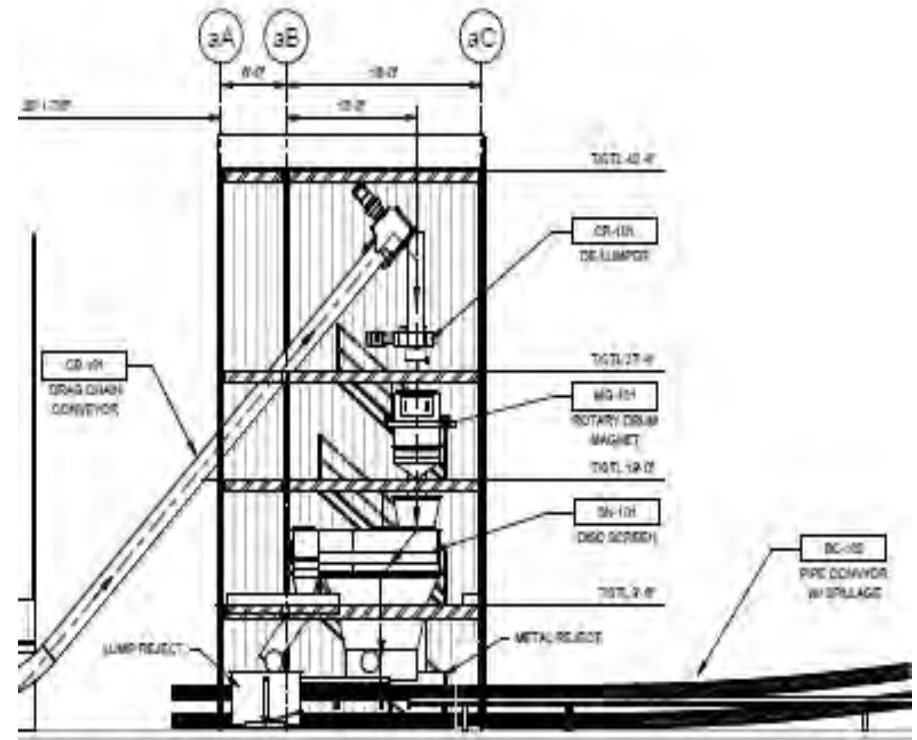
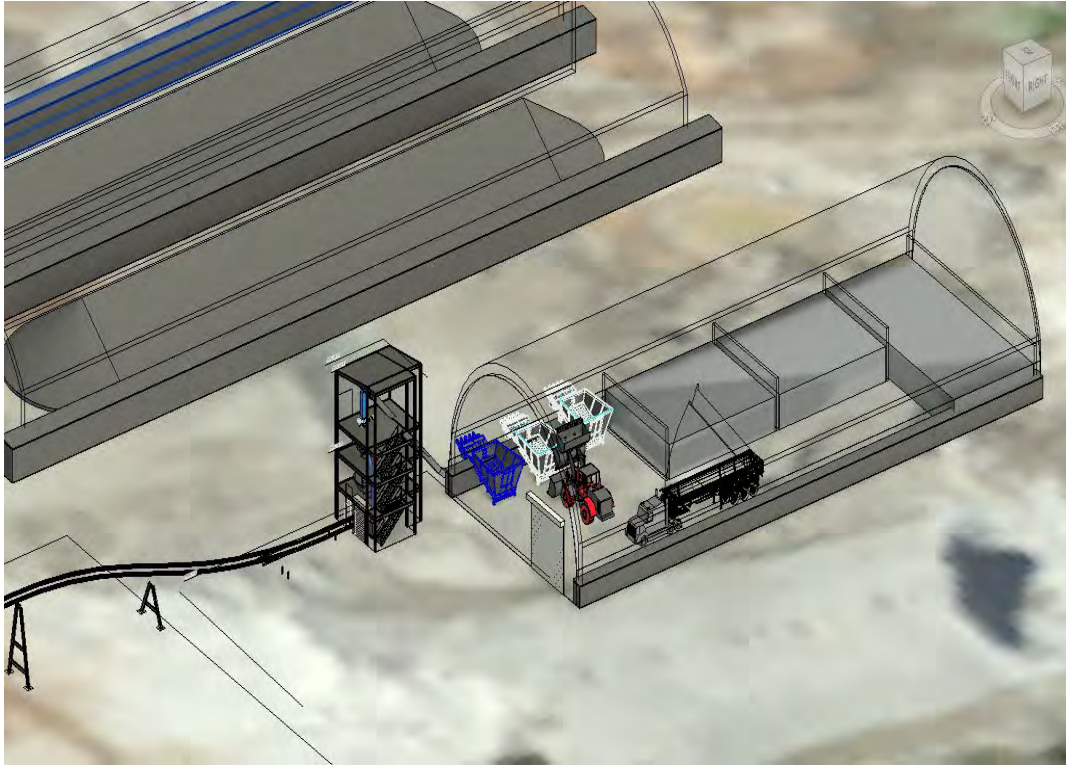
## LEGEND

- Material Flow
- ⇨ Emissions Release through Process Area



# Review of Conceptual Engineering Phase I

## Storage and Screening Building



## Kiln Firing



BREAK

Questions?

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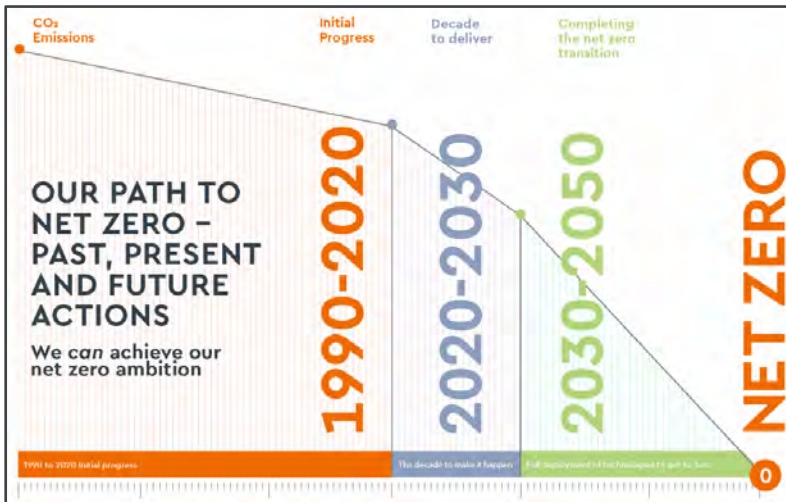


# CO<sub>2</sub> Emission Reduction Targets and Plans

Lehigh is applying to use up to 200 tonnes of Alternative Low Carbon Fuels (ALCFs) per day to replace coal and petcoke used currently.

ALCF supports:

- Lehigh Cement and the Canadian Cement Industry's greenhouse gas (GHG) emissions reduction targets,
- Canada's 2030 Emission Reduction Plan, and
- Ontario's Plan for building a circular economy.

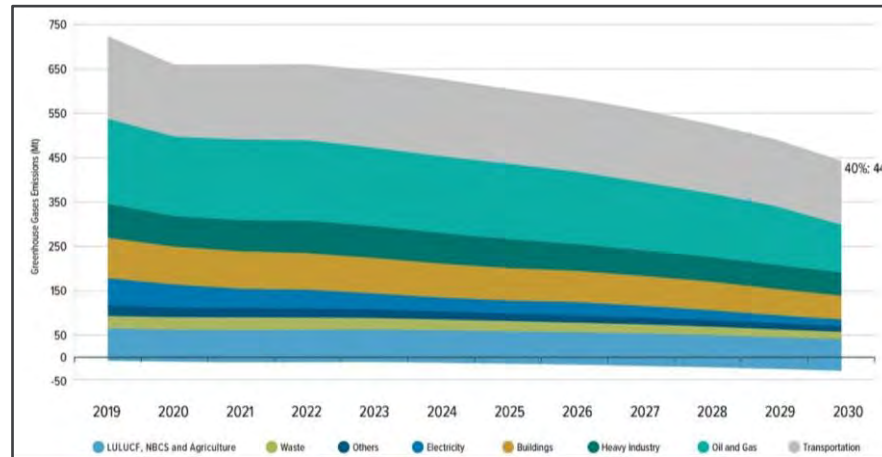


Cement Association Net Zero Path

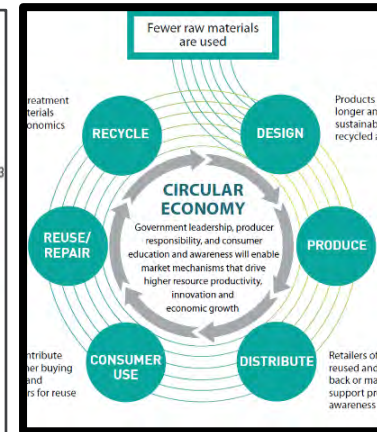
<https://www.canada.ca/en/services/environment/weather/climatechange/climate-plan/climate-plan-overview/emissions-reduction-2030.html>

<https://cement.ca/sustainability/our-roadmap-to-net-zero/>

<https://www.ontario.ca/page/strategy-waste-free-ontario-building-circular-economy#:~:text=A%20circular%20economy%20protects%20the%20environment.&text=Data%20tells%20us%20that%20increasing,from%20Ontario%20roads%20each%20year.>



Canada's 2030 Reduction Plan



Ontario's Plan for Circular Economy

**Lehigh Hanson**  
HEIDELBERGCEMENT Group



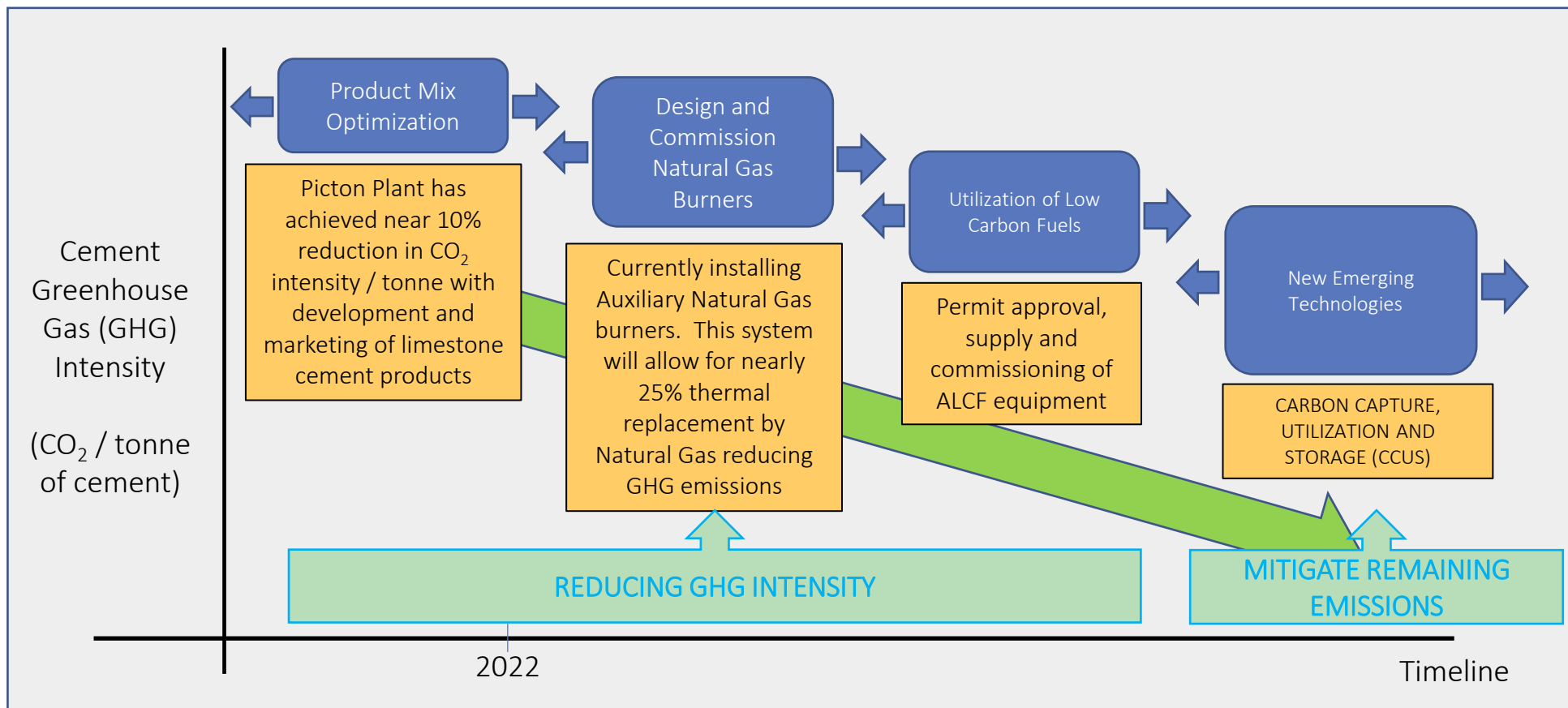
# Canada's Emission Reduction Plan



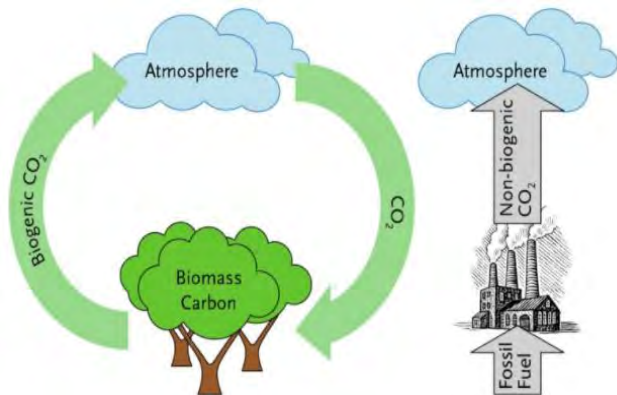
## KEY FACTS

- Canada's cement and concrete industry contributes approximately **158,000 direct and indirect jobs across the country, while contributing \$76 billion dollars in direct, indirect, and induced economic impact** into the Canadian economy.
- Canada's [Emissions Reduction Plan](#) projects a reduction of 25 megatonnes of GHG emissions from all heavy industry between 2019 and 2030.
- Canada's cement and concrete industry has [engaged in a partnership](#) with Industry, Science and Economic Development Canada (ISED) to achieve net-zero concrete by 2050.
- The Global Cement and Concrete Association (GCCA) released its [Net-Zero Global Roadmap](#) in October 2021. Set to be released in 2022, Canada's cement and industry roadmap to net-zero concrete will be unique to Canada's economy and policy environment while aligning with its international peers. It will aim to reduce CO<sub>2</sub> emissions by up to 40% by 2030 and deliver net-zero concrete by 2050.
- A transition to Alternative Low Carbon Fuels has been identified as a key component of cement and concrete GHG Reduction roadmaps around the world.

# Picton CO<sub>2</sub> RoadMap – Pathway to Reduce GHGs



# CO<sub>2</sub> Emission Intensity Assessment

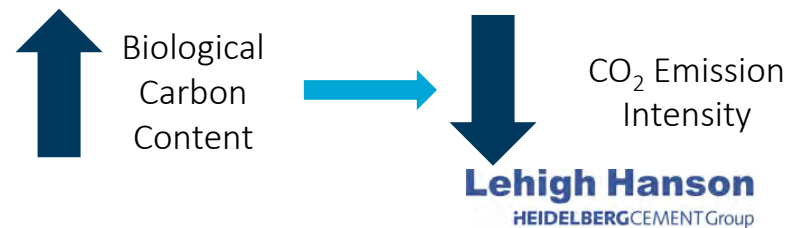


## What is CO<sub>2</sub> emission intensity?

- An indicator of the amount of CO<sub>2</sub> that is produced when a fuel is combusted.
- Expressed as kg CO<sub>2</sub> produced per GJ of fuel consumed.
- A lower CO<sub>2</sub> emission intensity value means the fuel will release less CO<sub>2</sub> per unit of energy.

## How is CO<sub>2</sub> emission intensity measured for this project?

- CO<sub>2</sub> emission intensity calculations are based on the amount of total and biogenic carbon in the fuel.
- Biogenic carbon is the portion of carbon in fuel that is derived from biomass such as plants, animals, micro-organisms, or other organic matter. In the case of ALCF this is normally wood, paper, and cardboard.
- Conventional fuels (i.e. coal, petcoke) – CO<sub>2</sub> emission intensity is based on the total amount of carbon in fuel, as they contain no biogenic carbon.
- ALCF – CO<sub>2</sub> emission intensity is based on the amount of **non**-biogenic carbon in the fuel. i.e. CO<sub>2</sub> from biogenic carbon is considered carbon neutral.



# CO<sub>2</sub> Emission Intensity Assessment

- Parameters of CO<sub>2</sub> Emission Intensity calculation (preliminary):

Type of Fuel	Conventional Fuels		Alternative Low Carbon Fuels			
	Coal <sup>a</sup>	Petcoke <sup>b</sup>	C&D <sup>c</sup>	IC&I <sup>d</sup>	RDF <sup>e</sup>	Discarded Treated Seed
High Heat Value [GJ/t]	28.1	33.2	15.7	25.9	21.7	14.6
Total carbon [% wt]	69.2%	82.0%	37.6%	57.0%	45.8%	35.2%
Non-biological carbon [% wt] <sup>f</sup>	100%	100%	8%	36%	36%	0%
CO <sub>2</sub> Emission Intensities [kg CO <sub>2</sub> /GJ]	90.2	90.7	17.5	51.2	61.1	0.0
Notes:	(a) Coal parameters are based on the average of eight samples (b) Petcoke parameters are based on the average of six samples (c) Construction and Demolition waste. C&D parameters are based on the average of ten samples (d) Industrial, Commercial, and Institutional waste. IC&I parameters are based on the average of two samples (e) Refuse Derived Fuel. Parameters are based on a single sample (f) Non-biological carbon is expressed as a percentage of the total carbon in each fuel.					

## Conventional Fuel

$$\text{CO}_2 \text{ emission intensity} = \text{CC}_{\text{total}} \times 3.67/\text{HHV}$$

## ALCFs

$$\text{CO}_2 \text{ emission intensity} = \text{CC}_{\text{non-bio}} \times 3.67/\text{HHV}$$

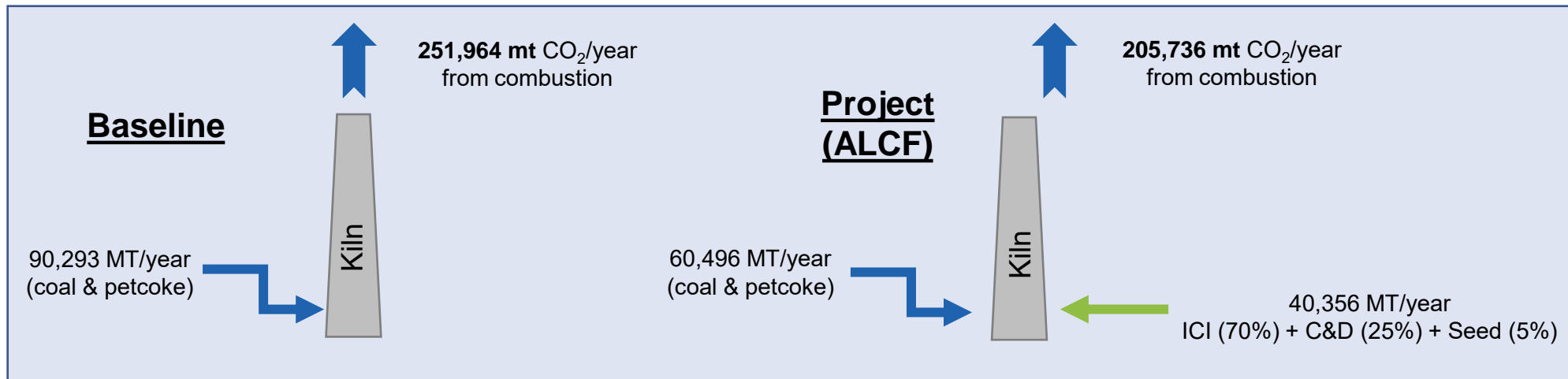
$$\text{CC}_{\text{non-bio}} = \text{total carbon [\% wt]} \times (1 - \text{biological carbon [\% wt]})$$

- The ALCFs meet the requirements of O. Reg. 79/15:

- CO<sub>2</sub> emission intensity: ALCFs < Coal and Petcoke ✓
- ALCFs High Heat Value > 10 GJ/t ✓

# CO<sub>2</sub> Emission Intensity Assessment

- Picton's annual thermal energy requirement is approximately 2,784,000 GJ/year.
- Compared a Baseline Scenario (46% coal, 54% petcoke) to a Project scenario using a blend of ALCFs to provide 30% of energy required (ALCF Mix: 70% ICI, 25% C&D and 5% seed).



Fuel	Total [kg CO <sub>2</sub> /GJ]	% biogenic carbon
Coal	90.2	—
Petcoke	90.7	—
Natural Gas	50	—
C&D	17.5	80%
ICI	51.2	37%
RDF	61.1	21%
Seed	0.00	100%
<b>ALCF Blend</b>	<b>40.2</b>	<b>51%</b>

46,228 mt of CO<sub>2</sub> reduced!

# CO<sub>2</sub> Emission Intensity Assessment

The utilization of ALCFs at the Lehigh Picton Plant instead of coal and petcoke could reduce non-biogenic CO<sub>2</sub> emissions by approximately **46,000** mt (tonne) CO<sub>2</sub> annually.



<https://cpj.ca/wp-content/uploads/1TonneGHGsEquivalency.png>

BREAK

Questions?



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# ECA Application & ALCF Compliance

- Lehigh Picton Cement Plant is preparing the application to amend the current ECA for the Picton Cement Plant to allow for the permanent use of ALCFs (proposed fuels were discussed on slide 22).
- Lehigh Picton Cement Plant's application will meet all the requirements under Section 9 of the *Environmental Protection Act* and has three key regulations and guidelines for this Project

## O. Reg. 419/05 – Local Air Pollution

- Emission Summary and Dispersion Modelling (ESDM) Report

## MECP Noise Guideline (NPC 233 & NCP 300)

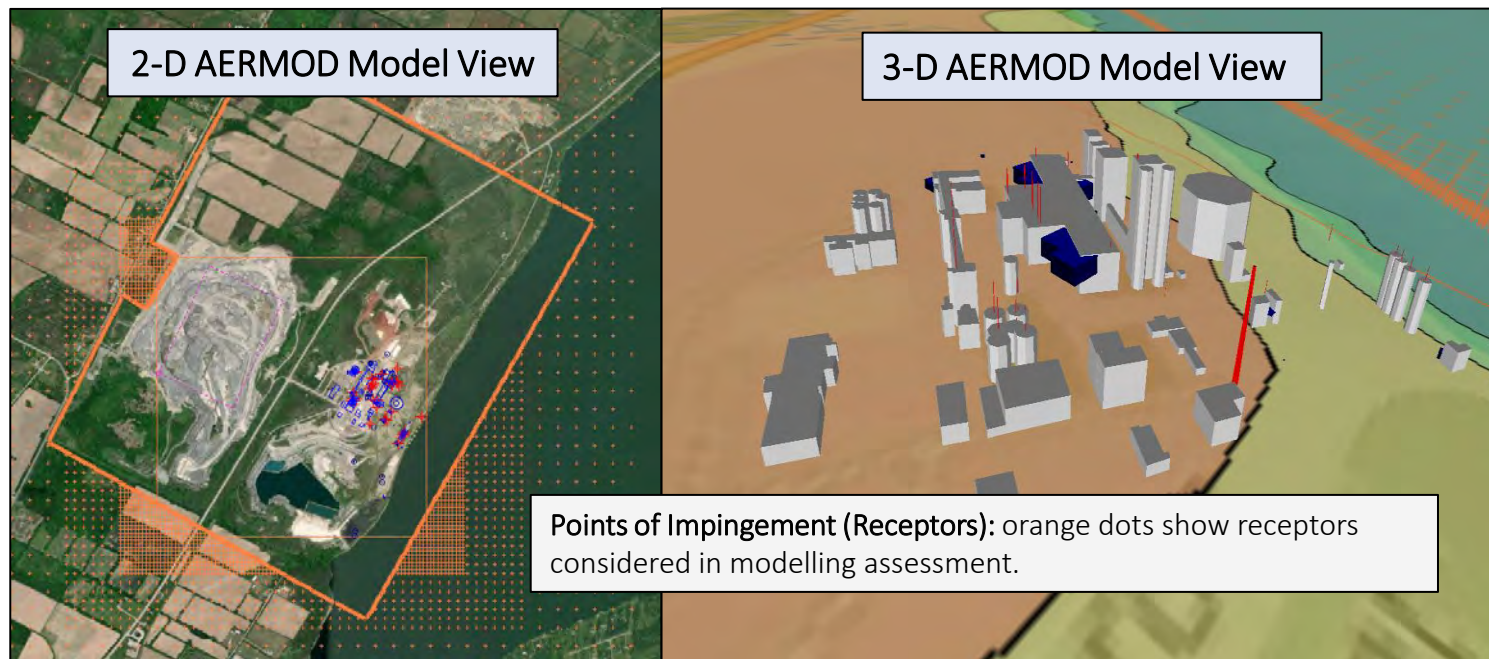
- Acoustic (Noise) Assessment Report

## O. Reg. 79/15 - ALCFs

- CO<sub>2</sub> Emission Intensity Report
- Consultation Report

## O. Reg. 419/ 05 & Emission Summary and Dispersion Modelling (ESDM) Report

- O. Reg. 419/05 prescribes the emission estimation methods, air dispersion modelling requirements and the air concentration limits at the point of impingements (receptors) for the Facility.
- O. Reg. 419/05 requires facilities to not underestimate emissions and assess a maximum emissions scenario for all contaminants of concern.
- The majority of the emissions from the Facility are emitted out of the Kiln 4 Main Stack that is equipped with **an electrostatic precipitator (ESP) pollution control** device & continuous emissions monitoring system (CEMS)



### Key changes from the previous ESDM Report:

- ALCF emission estimate screening and dispersion modelling of compounds.
- Removal of Kiln 3 from the assessment –not operating and no future plan to operate

# Kiln Emissions

## Kiln 4 + Bypass Stack Emission Assessment for ALCF's

### Picton Kiln 4

NOx Adjusted (ppmd)				
	1-Minute		1-Hour	
K4	158.3		148.4	
K4 Bypass	62.5		56.4	
NOx kg/hr				
	1-Hour		1-Month	Year to Date
K4	141.9		67299.6	10763...
K4 Bypass	3.7		1879.4	24091.2
Combined			69179.0	11004...
			Limit	2.2
NOx kg/ton clinker				
	1-Hour		1-Month	Year to Date
K4	1.24			
K4 Bypass	0.03			
Combined			1.6	2.5

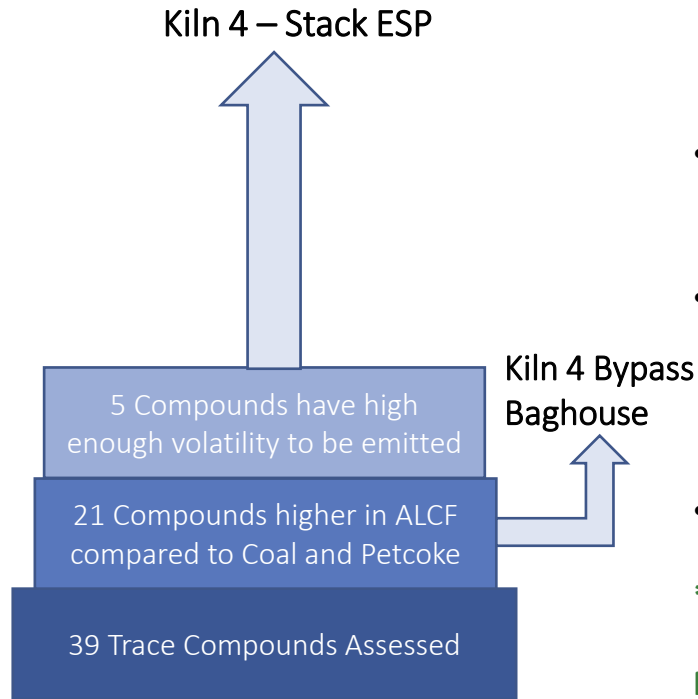
SO2 Adjusted (ppmd)				
	1-Minute		1-Hour	
K4	161.7		164.3	
K4 Bypass	14.9		7.5	
SO2 kg/hr				
	1-Hour		1-Month	Year to Date
K4	218.8		79690.0	13217...
K4 Bypass	0.7		664.9	15188.6
Combined			80354.9	13369...
			Limit	3.0
SO2 kg/ton clinker				
	1-Hour		1-Month	Year to Date
K4	1.92			
K4 Bypass	0.01			
Combined			1.9	3.0

- Types of Emissions from the kiln?
  - Combustion exhaust gases (mostly water & CO<sub>2</sub>) , excess air (mostly nitrogen and excess oxygen to promote good combustion)
  - Criteria Air Contaminants: Particulates, Oxides of Nitrogen (NOx), Sulphur dioxide (SO<sub>2</sub>), carbon monoxide (CO)
  - Trace incomplete combustion products: Volatile Organic Compounds (VOC) & Polycyclic Aromatic Hydrocarbons (PAHs)
  - Trace Inorganic, metals & chlorinated compounds (e.g., HCl)
  - Dioxins & furans
  - Ammonia (naturally occurring in limestone & added to control NOx with SNCR)

# Expected Changes to Emissions with ALCFs

Compound Groups	Emission Control	Change from Conventional Fuels	Rationale	Monitoring
Combustion Air & Water	<ul style="list-style-type: none"> <li>none</li> </ul>	<b>Decrease in non-biogenic CO2</b>	<ul style="list-style-type: none"> <li>ALCFs reduce non-biogenic CO2 emissions; majority of these compounds are air (Nitrogen and Oxygen)</li> <li>ALCF's may contain higher moisture leading to increases water vapor</li> </ul>	CEMS
Particulates (dust)	<ul style="list-style-type: none"> <li>Material Handling in building</li> <li>Kiln 4 – ESP &amp; Kiln 4 Bypass dust collector</li> </ul>	Negligible	<ul style="list-style-type: none"> <li>Dust from truck traffic will be a negligible increase</li> <li>Material Handling will be carried out inside a building and covered conveyors</li> <li>Dust from the fuel combustion is insignificant</li> </ul>	CEMS (opacity) Fugitive Dust BMPP
Carbon Monoxide	<ul style="list-style-type: none"> <li>good combustion in the CEMS</li> </ul>	Negligible	<ul style="list-style-type: none"> <li>No material change to combustion efficiency is anticipated</li> </ul>	CEMS (monitor combustion)
Oxides of Nitrogen (Nox)	<ul style="list-style-type: none"> <li>CEMS &amp; SNCR (ammonia injection)</li> </ul>	Negligible	<ul style="list-style-type: none"> <li>NOx is mostly generated from the temperature of the combustion, not the fuel type. SNCR system operation to control NOx emissions</li> </ul>	CEMS
Sulphur Dioxide (SO2)	<ul style="list-style-type: none"> <li>Kiln 4 – Lime injection (currently being trialed)</li> </ul>	Negligible	<ul style="list-style-type: none"> <li>SO2 is mostly a result of the raw materials (limestone). The fuels will be screened to be low in sulphur.</li> </ul>	CEMS
Trace Incomplete Combustion Products: VOC & PAHs	<ul style="list-style-type: none"> <li>Source Testing</li> <li>Interlock</li> </ul>	Negligible	<ul style="list-style-type: none"> <li>It is not expected that VOC &amp; PAH emissions will change due to the high temperature and residence time of the kiln.</li> </ul>	Source Testing
<b>Trace inorganic metals &amp; chlorinated compounds</b>	<ul style="list-style-type: none"> <li><b>Kiln 4 - ESP</b></li> <li><b>Incoming testing and fuel handling on ACLF materials</b></li> </ul>	<b>May Increase</b>	<ul style="list-style-type: none"> <li><b>Based on material lab analysis, certain inorganic materials &amp; metals may increase. These increases in potential emission estimates have been assessed and will be discussed on the next slide.</b></li> <li><b>ALCFs may have higher chlorine content. Emission increases have been estimated and assessed.</b></li> </ul>	<b>Incoming Fuel Handling</b> <b>Source Testing</b>
Dioxins & Furans	<ul style="list-style-type: none"> <li>Source Testing</li> <li>Interlock</li> </ul>	Negligible	<ul style="list-style-type: none"> <li>It is not expected that D&amp;F emissions will change due to the high temperature and residence time of the kiln.</li> </ul>	Source Testing
Ammonia	<ul style="list-style-type: none"> <li>ammonia used to control NOx</li> </ul>	Negligible	Ammonia (naturally occurring in limestone & added to control NOx)	Source Testing

## Air Quality – ALCFs Emission Estimates



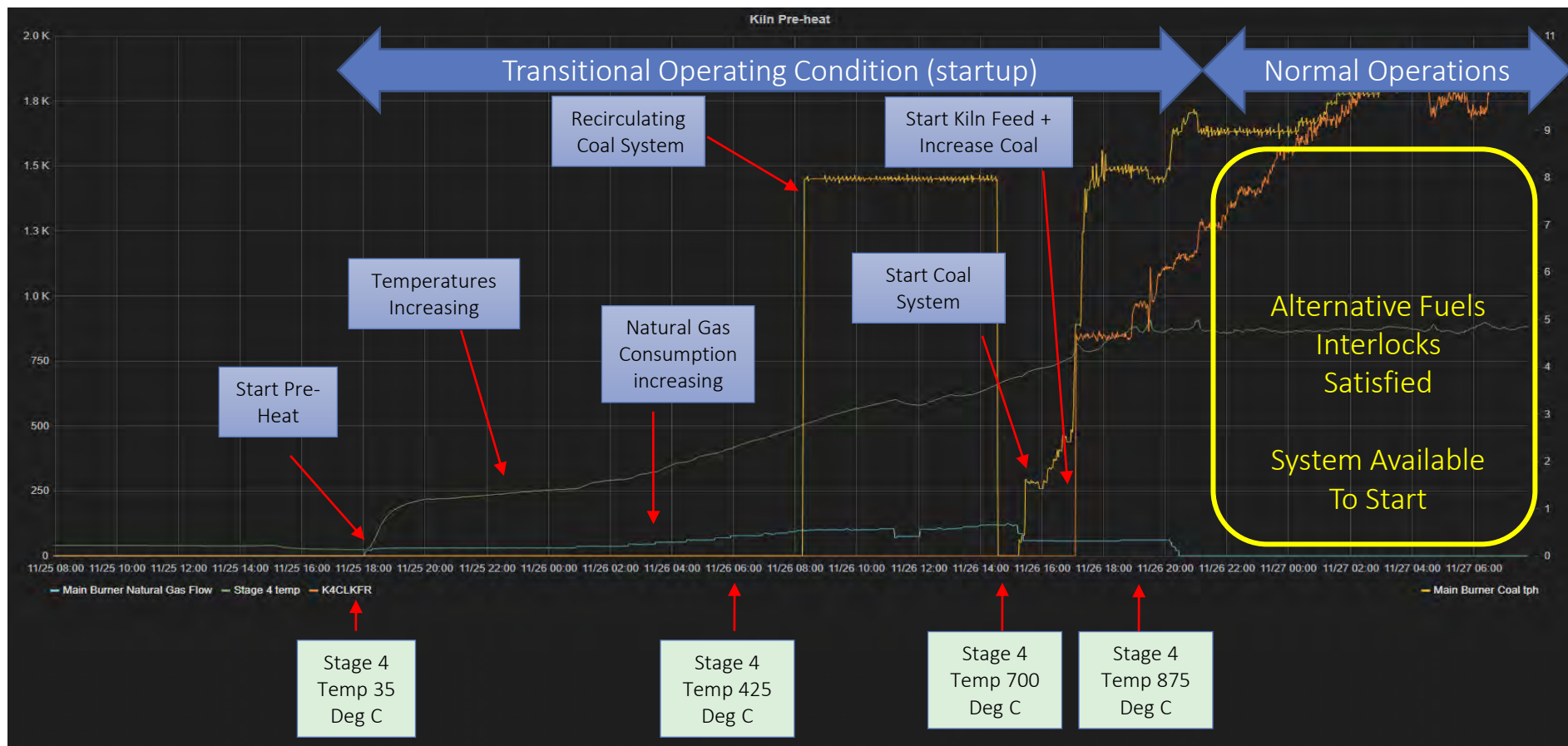
- 39 trace inorganic metals & chlorinated compounds from the proposed ALCFs and compared to the existing fuels of petcoke and coal based on lab analysis of the composition - **Mass Balance Approach**
- 21 compounds have higher concentrations in one of the four ALCFs groups compared to the existing fuels and were applied and estimated from **the Kiln 4 Bypass Stack**.
- 5 compound emission rates were applied to the Kiln 4 stack (**cobalt, HCl, mercury phosphorous and tin**). The other compounds were excluded due to volatility and would condense on the raw materials and eventually be bound in the clinker matrix and not emitted.
- Source testing on the Kiln 4 and Kiln 4 Bypass stack will be a requirement of the ECA

**\*conservative assessment as it assumes the worst case of any fuel at any given time\***

**Method references the European Commission Best Available Techniques (BAT) Reference Document for the Production of Cement, Lime and Magnesium Oxide**



# Process Controls / Interlocks





# Process Controls / Interlocks

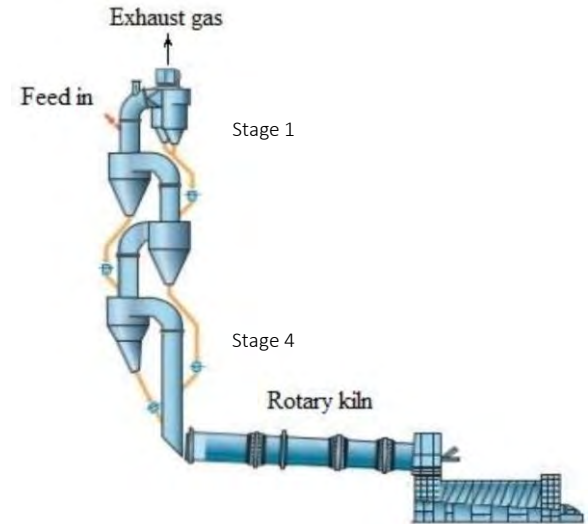
The process interlocks will be utilized to control the use of the ALCF Kiln Burner via the following conditions;

- The oxygen level at the top of the tower must not be less than 1.5%
- 2 of the 4 temperature probes at the top of the tower (stage 1) must not be greater than 600 Deg C
- The temperature at the bottom (stage 4) of the tower must be less than 920 Deg C
- The stage 4 CO level must not be greater than 2.85% (instantaneous)
- The stage 4 CO level must not be greater than 1.5% (time-delayed)
- The main burner must be running, and the feed is on the kiln
- At least 3 of the 4 Loesche fans must be running

If the process interlock is not satisfied, the new ALCF Burner cannot start or will trip if running.

The above conditions ensure that ALCF use is under ideal combustion conditions (normal operation) whereby high temperatures (2000 Deg C in kiln), appropriate Oxygen levels and long residence time to allow for complete combustion and fitting of the modelled assessment.

\*Additional items could be added by MECP, certified technicians and TSSA approvals upon their review



# ESDM Results

## ESDM Assessment Results

- All compounds considered were found to be below their MECP Air Quality Limits
- It is not anticipated based on our estimates that the ALCFs will have a significant impact on emissions
- Of the 89 unique contaminants assessed, 42 were considered negligible, 14 were less than 1%, The remainder were below their respective limits.
- The following tables presents the results of the AERMOD modelling and compounds that were found to be within **25% of their respective Limit** for both the normal (considers ALCF use) and the TOC scenarios and compounds which **we received comments on in Public Meeting # 1**

Emission Summary Table - Normal Operating Conditions (preliminary)

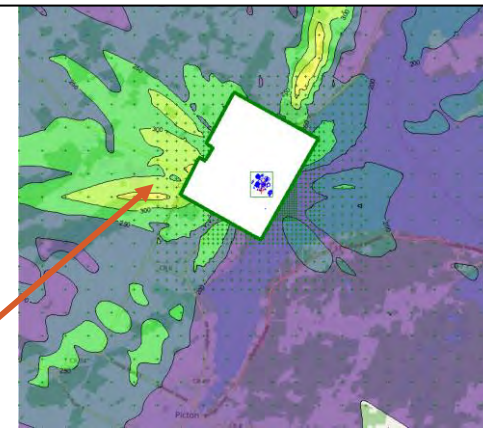
Contaminant	CAS No.	Total Facility Emission Rate [g/s]	Maximum POI Concentration [ $\mu\text{g}/\text{m}^3$ ]	Averaging Period	MECP POI Limit [ $\mu\text{g}/\text{m}^3$ ]	Limiting Effect	Percentage of MECP Limit [%]
Crystalline Silica	14808-60-7	1.89E+00	2.41E+00	24	5	Health	48%
Iron	7439-89-6	8.41E-01	1.40E+00	24	4	Health	35%
Mercury	7439-97-6	4.45E-02	1.45E-02	24	2	Health	<1%
Lead	7439-92-1	1.90E-02	1.44E-02	24	0.5	Health	3%
Lead	7439-92-1	1.90E-02	5.60E-03	30-day	0.2	Health	3%
Dioxins and Furans (TEQ)	N/A	1.87E-09	5.90E-10	24	0.0000001	Health	<1%
Hydrogen chloride	7647-01-0	3.17E+00	9.79E-01	24	20	Health	5%
Nitrogen Oxides	10102-44-0	1.19E+02	3.36E+01	24	200	Health	17%
Nitrogen Oxides	10102-44-0	1.19E+02	1.42E+02	1	400	Health	36%
SPM	N/A	2.00E+01	3.52E+01	24	120	Visibility	29%

Emission Summary Table - Transitional Operating Conditions (preliminary)

Contaminant	CAS No.	Total Facility Emission Rate [g/s]	Maximum POI Concentration [ $\mu\text{g}/\text{m}^3$ ]	Averaging Period	MECP POI Limit [ $\mu\text{g}/\text{m}^3$ ]	Limiting Effect	Percentage of MECP Limit [%]
Nitrogen Oxides	10102-44-0	2.17E+02	6.61E+01	24	200	Health	33%
Nitrogen Oxides	10102-44-0	2.17E+02	2.72E+02	1	400	Health	68%
Sulphur dioxide	7446-09-5	1.79E+02	2.40E+02	1	690	Health & Vegetation	35%
SPM	N/A	2.46E+01	3.52E+01	24	120	Visibility	29%

Meteorological anomalies removed

Isopleth of Maximum 1-hr Nox concentrations [ $\mu\text{g}/\text{m}^3$ ]



# Acoustic (Noise) Assessment Report

## Compliance with Ministry Noise Limits (NPC 233 and NPC 300)

- The Picton Cement Plant is required to meet the Ministry noise limits at neighboring off-site receptors and maintain an up-to-date Acoustic Assessment Report (AAR)
- The AAR assesses the combined noise impacts, from all activities on-site, at receptors using a 3-D noise model
- The Picton Cement Plant is currently working through a Noise Abatement Action Plan (NAAP) to reduce noise levels implementing improvements annually to existing equipment.



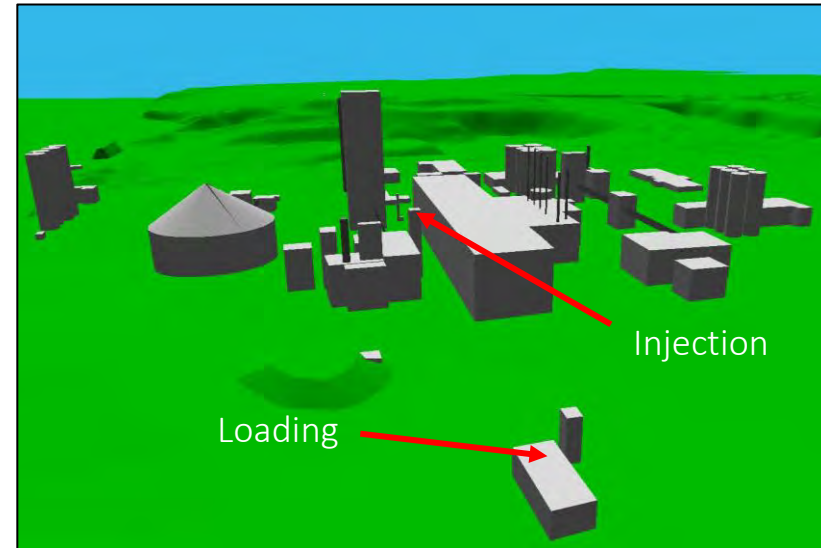
# Noise Assessment

Modelling of noise emissions associated with the ALCF Project sources was completed using CadnaA noise modelling software.

Major noise sources associated with the ALCF Project include:

- Blower (Rotary Feeder) – Injection
- Loader – Loading
- Shipment Truck – Loading
- Disc Screen – Loading
- Metal Reject Collection Bin – Loading

Equipment considered for the ALCF Project will be housed in dedicated structures to minimize noise emissions into the environment.



# Noise Assessment

## Modelling results

Table below summarize the predicted ALCF Project nighttime (most stringent limits) noise contributions at the relevant point of reception (POR) and outdoor points of reception (OPOR) located in four cardinal direction centered on the Lehigh facility.

Point of Reception	ALCF Project Contributions (dBA)	Facility Contributions <sup>(a)</sup> (dBA)	Combined Noise Levels (ALCF plus Facility) (dBA)	Change (dB)
POR003	21.5	32.8	33.1	0.3
OPOR003	21	29.0	29.6	0.6
POR006	22.2	31.8	32.3	0.5
OPOR006	22.3	31.3	31.8	0.5
POR016	29.3	38.1	38.6	0.5
OPOR016	29.6	38.4	38.9	0.5
POR020	25.2	35.5	35.9	0.4
OPOR020	24.6	34.1	34.6	0.5
POR037	29	39.5	39.9	0.4
OPOR037	29.4	40.0	40.4	0.4
POR044	28.4	38.5	38.9	0.4
OPOR044	28.1	38.1	38.5	0.4
POR061	27.2	39.5	39.7	0.2
OPOR061	26.8	38.9	39.2	0.3

(a) - Noise levels based on fully implemented Noise Abatement Action Plan (NAAP)

MECP Landfill Guidance Significance of Noise Level Increase

Sound Level Increase (dB)	Qualitative Rating
1 to 3 inclusive	Insignificant
3 to 5 inclusive	Noticeable
5 to 10 inclusive	Significant
10 and over	Very significant

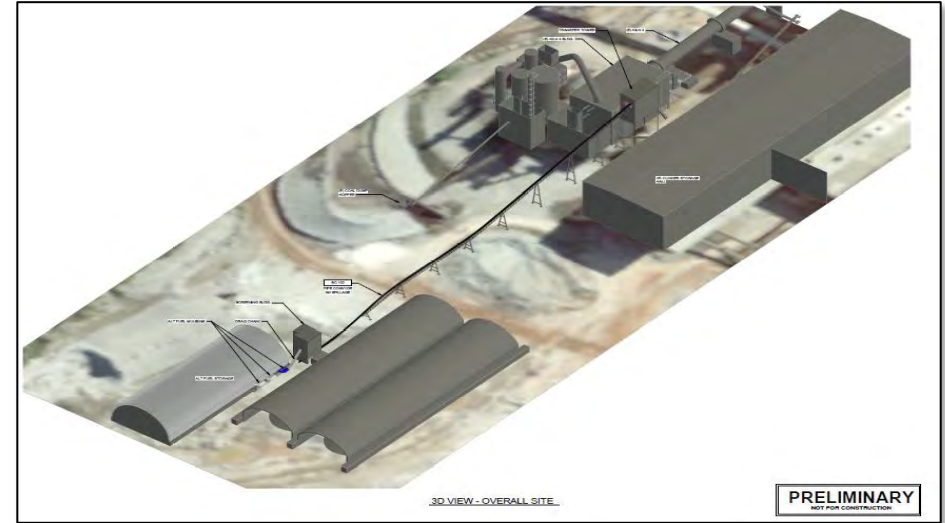
### General

#### Consideration:

Change of <3 dB is often not noticeable

## Additional Study Consideration – Archaeology / Cultural Heritage

- The ALCFs project footprint is small in relation to the Facility size and will not result in undisturbed ground being affected.
- The storage facility will be confined to an area within the plant operating boundary and in close proximity to the kiln system.
- The Project Team has engaged the Ministry of Tourism, Culture and Sport (MTCSC) as an Archaeological Assessment / Cultural Heritage Assessment is not anticipated to be required due to the size of the addition on previously disturbed areas of the Facility.





# Additional Study Considerations – Traffic Impact

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## Traffic Impact Assumptions:

- Anticipated 6-12 daily trucks associated with transporting ALCF at maximum operating potential; majority arriving and departing from site between Monday and Friday.
- While the incremental daily truck travel demand will be generated by the site between 7:00 a.m. and 7:00 p.m., we understand that the peak arrival and departure period will typically lie between 9:00 a.m. and 3:00 p.m. during which approx. 75% of the incremental truck arrivals and departures will be expected. (1 truck / hr)
- None of the incremental truck travel demand is expected to approach from or depart towards the west (through Picton) and that all trucks will approach from and depart towards Highway 401.

## Findings:

- Based on the magnitude and temporal distribution of the incremental truck traffic generated as a result of the approval of the ALCF permit, the incremental travel demand will not have noticeable traffic impacts at local intersections nor along Highway 49 between the plant driveway at 1370 Highway 49 and Highway 401 interchange.

# Next Steps for the Project

- Following Public Meeting #2, a **Consultation Report** that outlines a description of all consultation activities undertaken as part of the Amendment ECA Application will be prepared.
- Once the Consultation Report is completed, a **Notice of Completion of the Consultation Report** will be issued and the Consultation Report will be made available on the Project website for public review.
- The **ECA Application** will include the technical studies discussed at this meeting and will be posted on the Project website prior to the target submission date of **October 2022**.



# We want to hear from you!

## How can you participate in this project?

- Provide comments directly via email at: [LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)
- The Project Team is requesting comments by **September 15<sup>th</sup>, 2022**.
- Visit our Project website at [www.LehighPictonALCF.ca](http://www.LehighPictonALCF.ca) where all notices and presentation materials will be made available

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**APPENDIX D**

**Public Meetings Questions and  
Comments**

Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant – Public Meeting #1 – GoToWebinar Questions / Comments

Recorded Question or Comment	How Question or Comment Was Addressed
Could we please know who is currently speaking	Carsten Schrader, the plant manager.
What is tire fluff?	Tire fluff is what is left of the tire after everything that is recyclable / reusable has been taken from it. Typically, the nylon material that can not be recycled or reused in another way. We can not cannibalize the recycling industry to use an ALCF. Only the components that are non-recyclable / non-reusable can be used.
Will you need natural gas to use the alternate to pre-heat the kilns?	Lehigh will continue to pre-heat the kiln with natural gas, ALCF utilization would occur at satisfactory temperature and production.
where else in Canada are you using ALCF?	Within the Lehigh Cement Group, we have a facility outside of Richmond, BC (Delta Plant) and we are currently undertaking efforts at the Edmonton Plant to use ALCFs. There are already facilities in Ontario that have been approved under O.Reg. 79/15 to use ALCFs.
Cty rd 49!	N/A
What is the expected lifespan of the current quarry?	Greater than 50 years.
Will we have an opportunity to comment on the dispersion studies, since they will not be completed until after public meeting #2?	The results of the ESDM will be provided in Public Meeting #2, such that there will be an opportunity to review that material. Any comments will be captured in the consultation report.
what exactly is tire fluff?	Tire fluff is what is left of the tire after everything that is recyclable / reusable has been taken from it. Typically, the nylon material that can not be recycled or reused in another way. We can not cannibalize the recycling industry to use an ALCF. Only the components that are non-recyclable / non-reusable can be used.
How often are the emission exhaust filters updated? How many chimney's are there in use?	There are two exhaust stacks that emit combustion sources for kiln 4. These stacks are monitored with continuous emission monitoring systems which monitor for NOx, SOx, CO, and oxygen. Bag filters and Electrostatic Precipitators are utilized as exhaust filters and undergo daily checks and routine maintenance. Lehigh Picton typically has a Major and Minor outage period where preventative maintenance is undertaken.
How are the ALCF's transported to Picton? Are they covered at all times?	It is foreseen that there will be an enclosed storage facility and trucks will unload by backing into the storage facility. The ALCFs will be conveyed by a covered conveyor. The ALCFs will not be exposed to any of wind / water.
Will the ALCF's be covered at all times (including when they are being added to the storage areas?) There is a strong downwind which could blow loose ALCF's down in Picton Bay.	It is foreseen that there will be an enclosed storage facility and trucks will unload by backing into the storage facility. The ALCFs will be conveyed by a covered conveyor. The ALCFs will not be exposed to any of wind / water.
Hwy 401??? Doesn't he mean Hwy 49 for the tunnel?	Yes, the tunnel is under Hwy 49.
What controls are there on the waste material ie content	Lehigh has developed a fuel handling and receiving protocol. The following is a summary of what is included in this manual: <ul style="list-style-type: none"><li>• Background, including a site description and proposed storage and handling equipment</li><li>• Handling procedures for ALCFs, and including incoming and outgoing records</li><li>• Material acceptance and vendor screening process</li><li>• ALCF sampling and testing, and steps taken upon identification of deficiencies</li></ul> The sampling and testing will be completed to ensure the material assessed is included in the ESDM Report, satisfies O. Reg 79/15 and plant operating parameters (i.e., environmental, operational and carbon testing).
what happens when there are malfunctions or failures in the kiln such as incomplete combustion. how does that affect emissions and does the model account for that?	Our model has to consider worst case scenarios, such as start up / shut down conditions. We have to model with conservatism and where the standard requires (e.g. 1 hour 24 hours).
What will the impact be for highway 49 having that many additional trucks per day	At full capacity of the permit we are expecting 8-12 trucks a day assuming deliveries will only be taking place during the week. If it is a public concern that approximately 10 additional trucks per day can cause a traffic problem on Hwy 49, this could be further studied to see how the traffic will be impacted.
do you pay for the limestone you take out, and how much?	Lehigh has its own quarry on site (north quarry). There is a tunnel under Hwy 49 which transports the limestone to the facility. The Ontario Aggregate Resources Corporation (TOARC) fees are applied to each metric tonnes (mt) of limestone from the quarry used in the manufacturing of cement. The TOARC fees are proportioned to the local municipality and the crown accordingly to be allocated as needed. TOARC fees are in addition to the property tax and marine transport fees.  Lehigh extracts approximately one million mt of limestone that is used in the making of clinker/cement.

Recorded Question or Comment	How Question or Comment Was Addressed
What is discarded send treated with and what is the "exhaust" from using that seed	They are treated with pesticides. The exhausts will be reviewed to ensure that the use of these materials are in compliance with O. Reg. 419. The pesticides on the seeds are trace amounts and it is extremely unlikely that any contaminant emissions will be produced upon combustion.
What is discarded seed treated with and what is the "exhaust" from using that seed	They are treated with pesticides. The exhausts will be reviewed to ensure that the use of these materials are in compliance with O. Reg. 419. The pesticides on the seeds are trace amounts and it is extremely unlikely that any contaminant emissions will be produced upon combustion.
Which government agency is responsible for monitoring your emissions and do they magically appear or tell you when they are coming.	<p>It is the Ministry of the Environment, Conservation, and Parks (MECP) that issues the Environmental Compliance Approvals (ECAs) that allows for the Facility to operate and discharge a contaminant into the natural environment. Lehigh currently operates with 0073-BHGQHC, dated, October 31, 2019. This type of ECA requires the Facility to report annually on the status of the Facility compliance with the Ontario EPA, the ECA, the air limits in O. Reg. 419/05 and the noise limits in NPC-300. This report is referred to as an Annual Written Summary and is submitted to the Director.</p> <p>One of the conditions of the ECA is to continuously monitor to for NOx, SO<sub>2</sub>, CO, opacity and oxygen on the main Kiln 4 stack and the Kiln 4 bypass stack.</p> <p>The local district office does make unannounced planned periodic visits to carry out site visits and to audit site visits and best management practice plans (BMPPs)</p>
cant hear anything	N/A
how much greenhouse gas is being reduced? By %	<p>2/3 of the emissions come the calcination source; 1/3 of the emissions comes from the combustion of fuels. The 200 tonnes per day that we are applying for is a 35% replacement of the combustion of fuels. Public Meeting #2 will provide more clarity on the amount of GHG reduction.</p> <p>When we divert waste from landfills, we avoid the generation of landfill gasses such as methane. Methane gas has a global warming potential of 25x that of CO<sub>2</sub>. The emissions reductions from avoiding the production of landfill gas is greater even than the emissions reductions at the plant. It ends up being a significant reduction of GHG emissions.</p>
What are the benefits to Lehigh?	Heidelberg's sustainability goals include the reduction of CO <sub>2</sub> from cement manufacturing. The utilization of alternative fuels is one step towards achieving this goal.
do your greenhouse gas reduction figures include the greenhouse gas produced by trucking the waste to PEC?	The O. Reg. 79/15 does not require the consideration of the GHG emissions that may be produced through the transportation of ALCFs to the plant. However, these fuels are currently transported to landfills and as local landfills are becoming full, these fuels are being trucked to further distances (e.g., USA and further north). As a net, these trucking distances will be lower than the current trucking distance and the landfill emissions (e.g., methane) will be reduced by the diversion of these fuels for use of ALCFs. Trucking emissions are several orders of magnitude lower than reductions that will be realized at the plant. There is a net benefit to be using waste as a fuel rather than sending it to landfills.
What is 'compliant' material? Are any chlorine containing materials allowed?	<p>There are two key aspects as to what defines a compliant material for this project:</p> <ol style="list-style-type: none"><li>1. The ALCF meets the definition of an acceptable fuel in O. Reg. 79/15 and its not on the Schedule 1 of prohibited fuels.</li><li>2. The second is assessing whether the trace contaminants in the fuel do not result in offsite concentrations above MECP air limits. This will be done through quarterly material analysis testing that is comprised of several random samples throughout the quarter. Testing will provide the composition of the metals and inorganic contaminants that are present. Additionally, source testing will be completed to support our conservative mass balance emission estimate in emission summary and dispersion modelling report. Low concentrations of chlorine are acceptable but it should be noted that chlorine is an operational issue as well as environmental issue, so Lehigh will not accept materials with significant levels of chlorine. The ESDM currently assesses a maximum chlorine input concentration of 1.5% from ALCFs.</li></ol>
the question about the benefits to Lehigh means how does this conversion to alternative fuels benefit Lehigh?	There is GHG accounting program in Ontario and Canada. Cement is one of the industries that has to do GHG accounting. There is a price on carbon to incentivize the reduction of carbon emissions. A "do nothing" approach leads to higher emissions, higher compliance costs and a loss of competitiveness. Other cement producers are currently using or have applied for the use of ALCF under O. Reg. 79/15.



Recorded Question or Comment	How Question or Comment Was Addressed
How does Lehigh intend to prevent dangerous chemicals produced by incineration like furans and dioxin?	Within Lehigh's own experience, we have studied this in other facilities. The cement process burns at very high temperatures and we have complete combustion which reduces the likelihood of furan and dioxin productions. We will model the worst case scenario of contaminants and this will be presented in Public Meeting #2. Controls such as minimum temperature and / or residence time will be reviewed with MECP to ensure complete combustion.
If this is so widely used why dont you already know what chlorine levels/materials you can include?	The ALCF types and compositions are different depending on the supplier. Therefore, the ALCFs proposed for the Picton Plant will be analysed to ensure they are within the regulation standards. These results will be presented in Public Meeting #2. The ESDM currently assessed a worst-case chlorine content of 1.5% from any of the ALCFs.
So Lehigh does not gain any financial benefit from using alternative fuels?	The price on carbon is designed to incentivize the reduction of carbon emissions, and Lehigh's sustainability goals to achieve GHG reduction are in alignment with the regulations and Federal / Provincial GHG reduction targets. Competitiveness is an issue - other facilities use ALCFs; seeking an ECA to use ACLFs allows Lehigh to remain competitive - economic benefit.
What other substances are generated by these 'low carbon' substances' incineration? How dangerous are these vs the benefit of low carbon?	The ESDM requires that we remain in compliance with O. Reg. 419. O. Reg. 419 sets the standards such that under the worst case conditions, local air quality and the protection of public health is maintained. We will be demonstrating through the results of the ESDM that the use of the ALCFs being considered are below the standards otherwise they can not be considered for use. It is anticipated that the ALCFs being considered will be well below those standards for ALCF use.
how high is the kiln temperature?	The gas temperatures within the kiln can reach up to 2000 degrees Celsius. The clinkering temperature is 1300 degrees Celsius. This is an important distinction because our process requires much higher temperatures than incinerators.
Will you commit to stack testing now, and maybe continuing the monitoring and public reporting on substance levels?	Lehigh does many public reports and it is foreseen that part of the permit approval process we will be doing stack testing. It is expected that an amended ECA will not be issued to use ALCFs unless the kiln 4 stack and bypass are source tested. This would be consistent with other ALCF cement ECAs within Ontario  Additionally, the facility is required to continuously monitor for NOx and SO2 emissions from the Kiln 4 and Kiln 4 bypass stacks.
Given the high usage of 49 which is now increasing, has there been any consideration to help resurface 49?	Lehigh has been in discussions with the municipality on how Lehigh could get involved in the resurfacing of Hwy 49 and we will continue to discuss with the municipality.
How will the Fuel be delivered to the Plant	It is foreseen that ALCFs will be delivered by truck to the plant.
Will the Permit application address the quantity of alternate fuels that can be stored on site /	It is foreseen that we will be applying for a 5000 m <sup>2</sup> storage facility.  More detailed layout drawings and equipment will be presented as part of Public Meeting #2.
Is there a requirement to physically test at the stack to confirm the Modelling results?	It is anticipated that source testing will be a requirement of the ECA for ALCFs. Additionally, Lehigh has internal requirements to source testing requirements annually.
The plant output of 1 million tons, is that Lifetime, or annual?	The plant has the capacity with the current equipment to produce and ship up to a million tonnes of cement annually.
How would bulk fuels be delivered to the Picton Plant	It is foreseen that ALCFs will be delivered by truck to the plant.
How will ALCF storage be implemented at the Picton site	It is foreseen that we will be applying for a 5000 m <sup>2</sup> storage facility.  More detailed layout drawings and equipment will be presented as part of Public Meeting #2.
What is tire fluff?	Tire fluff is what is left of the tire after everything that is recyclable / reusable has been taken from it. Typically, the nylon material that can not be recycled or reused in another way. We can not cannibalize the recycling industry to use an ALCF. Only the components that are non-recyclable / non-reusable can be used.
What volume of ALCF's do you see being used at the Picton Plant in a year?	This permit application is applying for up to 200 tonnes per day of ALCFs to be used at the plant.
Is the federal government or Provincial subsidizing or offering financial incentive if so what amounts?	There are no confirmed funding from the provincial and federal governments.
how is the coal/petcoke currently delivered to the Picton Plant?	Both coal and petcoke are delivered through marine transport.
where does the coke/petcoke used at the plant come from	Lehigh has different sources. We have one in Canada and one in the USA.
Where will the Alt Fuels be processed/granualized - on your site or at a prior location?	These materials will not be processed on-site. They will be delivered as processed materials.

Recorded Question or Comment	How Question or Comment Was Addressed
What about odours from the burning of these Alt fuels?	It is not foreseen that there should be any odours from the combustion of ALCFs. We will have an enclosed building and transport system. We will be receiving these materials processed.
How will the Alt Fuels be fed into the kiln - by conveyor or by dumping???	It is currently foreseen that a conveyor will take material from the enclosed storage facility to the burner floor beside the kiln, where it will pneumatically inserted into the kiln.
Will this new fuel material cause any new source of fugative emissions at the plant?	No new fugitive emissions are expected. We foresee to install a fully enclosed storage system and fully enclosed transport system.
How does use of ALCF affect volume of truck and marine traffic in our county?	It is currently not foreseen that any ALCFs will be coming to plant via marine transport. However, through the use of ALCFs, the need to coal/petcoke will be reduced therefore reducing the number of marine imports required. It is anticipated that approximately 8 trucks per day on average will be utilized to import ALCFs to the facility. We would be looking at installing some storage to potentially allow operation of this process through the weekend, which may mean utilizing enough trucks to supply 7 days worth of fuels over a 5 day period, ideally not transporting over the weekend. This is still to be determined depending on the supply location and the trucking industry.
There are a large number of materials listed including tires. I would like some assurance that your technical analysis include a study of ALL possible Carcinogens which could be emitted by burning all of these materials.	Technical studies will be conducted to ensure these fuels are in compliance with the standards outlined in O. Reg. 79/15 and O. Reg. 419. The emissions from the kiln and their offsite concentrations will be documented in the Emission Summary and Dispersion Modelling (ESDM) Report and the maximum off-site concentrations for each contaminant emitted from the facility must meet the air standards and guidelines of O. Reg. 419/05. These standards are set at levels that are protective of human health and the environment.
Natural gas could provide a lower emissions alternative to coal or petcock. Why is this not being considered as an alternative?	We are installing burners to use Natural Gas in addition to ALCFs (not a low carbon fuel)
Do you use any water, and discharge water as part of the kiln process. or is it all air and heat?	With respect to ALCFs, there will be no change to the water system at the plant. Currently, Lehigh uses water for cooling. All of the processed water and stormwater is used in a closed-loop system. There is a settling pond and quarry pond to manage the water used for cooling. The facility has a discharge point. The discharge point is monitored and tested weekly and quarterly. Historically there has not been any concerns regarding discharged water.
And you haven't mentioned fuel yet, where is this process happening, and how do you control discharge into ambient environment.	The ESDM is a model that contains the different emission points of the facility. This model considers the topography of the surrounding area, the elevation of the emission points, and the meteorological data which is done in conjunction with the Ministry (MECP). The ESDM considers the worst case scenario - what could be the potential highest concentration of any contaminant at the point of re-entry. These models are built with conservatism in mind to make sure that where we operate should be far below where a limit should be.
Thank you	N/A
Where is the ALCF produced	Lehigh is still working on the sources. The potential sources that are being investigated are 50 to 200 kilometres away, some may be further or closer.
Does Lehigh take part in any tree planting programs locally to offset their emissions?	Lehigh does not currently do any offsetting programs through tree planting, however, we are always actively looking for opportunities to do such things. To participate in such things would require that we have regulatory and political certainty in how we can do the GHG accounting for these programs. Ontario is underway to administer an offset program this year. Should this become an option Lehigh is happy to explore these opportunities.
if you are burning plastics you are burning petrochemicals so what is the point as C02, S02 and NO2 are produced	The goal of utilizing ALCF's is to reduce GHG emissions. O. Reg. 79/15 requires not only compliance to emission standards, but that the ALCF's have a lower GHG intensity than coal / petcoke.
RDFs are controversial in Europe - why?	Lehigh is not aware of what the controversy is. The high utilization of ALCFs speaks to the fact that its being done successfully and for a long time. It's well documented and understood that it can be done safely and will result in a net benefit to the environment.
Why have my questions not been answered	N/A
the Zero Waste Europe which lists Heidelberg's breakdown includes Wasteoil, Solvent & Liquid Waste and Plastic 26.4 % so why is your breakdown different?	This question was related to the Zero Waste article that was provided by the Prince Edward County Conservancy. The Project Team provided a response via email to the County Conservancy.

Recorded Question or Comment	How Question or Comment Was Addressed
How are you going to reduce Dioxins, Furans and heavy metals from using RDFs	We will be studying the effects of ALCFs. We have a very good understanding of emissions through our experience with use of ALCFs at Lehigh's Delta and Edmonton Plants. We will be modelling any such effects and providing the results in meeting #2. Cement manufacturing process is ideal for using ALCFs for three reasons: 1) the temperature in the kiln is much higher than in an incinerator; 2) there is a long residence time 3) because we have a lot of mineral material coming down and through the kiln and because the majority of this mineral materials lime-type (alkaline) material it acts as an efficient scrubber for all sort of particulate, metals and acid gases; and 4) the cement kiln system takes the ash material produced and combines it to produce the final product (i.e., effectively a zero residue system). Finally, process controls for the use of ALCF IE min operating temperature etc. will be implemented to ensure complete combustion.
Carbon dioxide is a natural component in BioGeoChemical Cycles by burning plastic which is a fossli fuel you are adding to the C02	The ALCFs may contain fractions of plastic; however, the net CO <sub>2</sub> intensity of the ALCF must be lower than coal and petcoke to be allowable under O. Reg. 79/15. Although the facility will be burning a different source of a fossil fuel, it is significantly better than from a biogenic CO <sub>2</sub> intensity perspective to use an ALCF containing plastic, and organic materials, than to burn to coal or petcoke.
The high temperatures will break down the organic bonds in Dioxins as well as Nitrogen & Oxygen as the gases cool they will reform into So2 & NO2 which can only be removed by selective catalysed reduction stage explain hiw to reduce these gses.	The facility does already have an SNCR system. We utilize aqueous ammonia to reduce our Nox emissions. We also have the capacity to use hydrated lime to reduce SO <sub>2</sub> emissions. We utilize these systems as required to ensure we are in compliance with the regulations.
ACLFs are not the point it is the RDF component that is the problem so why do not address the RDFs	The fuels from RDF's chemical composition could be similar to that of an ICI material. The composition of the fuel and its physical properties derive the suitability as an ALCF.
you noted that you were licensed by Ministry for coal, petroleum coke and natural gas. Do you use all three of these fuel sources, or only natural gas?	Currently, natural gas is used to pre-heat the kiln. Coal and petcoke are used for the clinkering process.
In the last chart there are some abbreviations. What do they stand for? (Sorry if I missed hearing you explain during your presentation) ICI RDF; MSN REF; C&D RDF	ICI RDF - Industrial, Commercial, Institutional Refuse Derived Fuel MSW RDF - Municipal Solid Waste Refuse Derived Fuel C&D RDF - Construction & Demolition Refuse Derived Fuel
will you be using / diverting wastes from United States?	Lehigh has not determined where the ALCFs are coming from, however, there is a facility in Buffalo, NY that is being looked at. This is just one of the potential suppliers we are considering at this time.
You've mentioned accoustic emissions but what about odours? Are there more smells associated with using ACLFs. Any studies in Europe noting smells?	It is not foreseen that there should be any odours from the combustion of ALCFs. We will have an enclosed building and transport system. We will be receiving these materials processed.
What studies in Europe are you referring to? Do any of these studies refer specifically to cement companies and ALCF's	Referring to the slide that discussed that many countries in Europe are already above 50% substitution rates. This has been done for a long time, is well documented and understood.
how many trucks are anticipated to be transporting ALCF's on a weekly basis?	It is anticipated that approximately 8 trucks per day will be utilized to import ALCFs to the facility at full capacity. We would be looking at installing some storage to potentially allow operation of this process through the weekend, which may mean utilizing enough trucks to supply 7 days worth of fuels over a 5 day period, ideally not transporting over the weekend. This is still to be determined depending on the supply location and the trucking industry.
Will emissions be independently monitored? If so, who would that be?	Lehigh has continuous emissions monitoring, this monitoring is third party audited for verification as per the ECA requirements / PG7 guideline.
will the second public meeting be in person? Were you required to hold this meeting virtually, as a webinar?	Unfortunately with COVID, we are doing PM #1 virtually. Should things subside and its is deemed acceptable from a public health and social standard, we would prefer to hold PM #2 in-person.
Is there a plant that produces fluff from the approved sources near our location?	Unsure of the exact location, however there are tire recyclers in Ontario. Not within the immediate area.
If the ALCF has to come from the USA , Could it be sent by water?	Currently, the storage building will be designed to receive ALCFs by truck only.
Besides coal and peticoke, it is my understanding that the plant uses natural gas as a fuel as well. Is natural gas more efficient and environmentally friendly than coke and peticoke? How does natural gas compare to alternative low carbon fuels when considering emissions and the environment? How does natural gas compare to ALCFs with respect to efficiency and economics? What are the benefits of ALCFs over natural gas?	Natural gas does have a lower GHG emission than coal or petcoke. There are also unique challenges with natural gas and its inherent emissions of NOx. As opposed to ALCFs that have a high biogenic content and near zero GHG emission effect, which is much better than natural gas in that aspect. The first step in the pathway to reducing GHG emissions will be a combination of using natural gas and ALCFs.
This all sounds too good to be true, so what are the acknowledged risks and concerns commonly associated with ALCFs? Why does using them require an amended ECA? Any concerns about odours or noxious emissions?	The amendment to the ECA is required because there is a specific regulation (O. Reg. 79/15) that specifies how we have to apply to use ALCFs.  The risks and concerns are that its not easy for a cement manufacturer to implement another fuel. Moving to a more sustainable world requires more work but its worth it.
Great answer. And impressive answers (knowledgeable and thoughtful) to all the questions so far. Thanks!	N/A

Recorded Question or Comment	How Question or Comment Was Addressed
if your trucking ALCF matter 200 km isn't it offsetting any good gained by burning this product?	<p>The O. Reg. 79/15 does not require the consideration of the GHG emissions that may be produced through the transportation of ALCFs to the plant. However, these fuels are currently transported to landfills and as local landfills are becoming full, these fuels are being trucked to further distances (e.g., USA and further north). As a net, these trucking distances will be lower than the current trucking distance and the landfill emissions (e.g., methane) will be reduced by the diversion of these fuels for use of ALCFs. Trucking emissions are several orders of magnitude lower than reductions that will be realized at the plant. There is a net benefit to be using waste as a fuel rather than sending it to landfills.</p> <p>Additionally, this ignores the reduction in reliance on coal and petcoke which is an emission intensive mining process with great distances required to travel via marine.</p>
What will be the maximum Chlorine content in the plastics to be burned ?	<p>The maximum chlorine content that would be allowed will be assessed through our technical studies. Fuels can only be utilized if they demonstrate compliance.</p>
<p>Thank you Casten and team for a very interesting and informative presentation. I wholeheartedly support the SAFE and CONTROLLED use of Alternative Fuels to reduce the Carbon Footprint of the Picton Plant. Hover, the devil is in the details. As a Picton resident my areas of concern are</p> <p>1 - Alternative fuels is a non homogeneous material - who do you ensure you get a representative sample to ensure compliance?</p> <p>2 - How much storage will be at the plant ? Fire prevention of storage area?</p>	<p>Before materials are received at the plant, the sites have to be visited and samples collected for verification. We have a requirement to produce a high-quality product and maintain stable kiln operation. It is inherently within our best interest to ensure we are receiving materials we have specified.</p> <p>At the Delta Plant, a sample is taken from each truck and every two-three days these samples are combined together. The laboratory takes the material, freeze dries it and grinds it into a fine powder to analyze it.</p> <p>Lehigh would look to install a storage facility such that operations could continue throughout weekends. Something like a 5000 m<sup>2</sup> storage and handling facility.</p>
is the material used mainly organic or inorganic matter?	<p>There is a mix of organic and inorganic matters.</p>
so is it correct to say that the actual amount of CO2 produced (ignoring the source of the CO2) will not change	<p>There are specific methodology in which cement facilities in Ontario and Canada can conduct their GHG accounting. These methodologies are well defined within the regulation. The accounting methodologies define how we would show the reductions by utilization of ALCFs. Utilizing fuels within the biogenic cycle ultimately does not add / contribute to and increase in CO<sub>2</sub> in the environment (i.e., carbon neutral). In short, at the facility level, there will be a reduction in non-biogenic CO<sub>2</sub> but not total CO<sub>2</sub>. From a regional holistic level there is a significant reduction with using ALCFs in replacement of conventional coal and petcoke.</p>
Is there any way to capture any heavy metals before they are emitted into the atmosphere	<p>The process is inherently a very good scrubber. Heavy metals will be in very small quantities which will be incorporated into the final product.</p> <p>Additionally, any trace metal emissions will be in the form of particulates, and the Kiln 4 exhaust stack has an electrostatic precipitator to reduce/control the emissions of particulates. Kiln 4 bypass is equipped with fabric filter dust collector to control emissions of particulates.</p>
I understand that any acids are neutralizes as part of the process but what about the potential emissions of dioxins and furans	<p>We will be studying the effects of ALCFs. We have a very good understanding of emissions through our experience with use of ALCFs at Lehigh's Delta and Edmonton Plants. We will be modelling any such effects and providing the results in meeting #2. Cement manufacturing process is ideal for using ALCFs for three reasons: 1) the temperature in the kiln is much higher than in an incinerator; 2) there is a long residence time 3) because we have a lot of mineral material coming down and through the kiln and because the majority of this mineral materials lime-type (alkaline) material it acts as an efficient scrubber for all sort of particulate, metals and acid gases; and 4) the cement kiln system takes the ash material produced and combines it to produce the final product (i.e., effectively a zero residue system). Finally, process controls for the use of ALCF IE min operating temperature etc. will be implemented to ensure complete combustion.</p>
Will the existing furnaces currently used for coal be used for the ALCFs or will you need a new incinerator system to handle the new fuel	<p>The new fuels will have their own burner to allow the effective combustion; however, these will be burned inside of the kiln. We will be looking to procure the specialized combustion equipment that is designed for the specification of these fuels to allow for complete combustion.</p>



Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant – Public Meeting #2 – Microsoft Teams Webinar Questions

Recorded Question or Comment	How Question or Comment Was Addressed
Procedural question: Is public input via chat without any in-person aspect actual public input? Does it meet legal requirements?	The Project Team is following O. Reg 79/15; it talks about the public engagement that is required. We are required to have two open houses, which can be virtual. All comments / questions will be documented in the Consultation Report that will be published for public review prior to submission the ECA Application. The Project Team has consulted with MECP regarding the approach to public engagement, particularly the two public meetings.
Will there be a more detailed explanation of how the alternative process works?	Yes there was a detailed explanation later in the presentation.
No video and no voice limits participation, no? Does it meet the accessibility law requirements? What if someone cannot type?	Following Public Meeting #2, the Project Team emailed attendees of the meeting inviting them to an open-house at the Lehigh Picton Cement Plant on Wednesday, August 31, 2022 to discuss any questions from Public Meeting #2 or the project overall.
Thank you Carsten, that is helpful.	N/A
Sean's response did not address my question, but Carsten's willingness to have people at the plant addresses concerns about in-person input, which some of my colleagues may want to engage in. I still think you need to consider accessibility requirements for public participation since anyone who cannot type cannot participate in either of these meetings.	Following Public Meeting #2, the Project Team emailed attendees of the meeting inviting them to an open-house at the Lehigh Picton Cement Plant on Wednesday, August 31, 2022 to discuss any questions from Public Meeting #2 or the project overall.
Where is it proposed to build the new storage and conveyor system?	The Project Team described the location of the proposed new storage and conveyor system referencing slide 26 of the Public Meeting #2 presentation
Where does the supply of ALCFs from household refuse come from? They were not designated on the map like the other sources of ALCFs.	Currently there are no available ALCFs from residential supply in Ontario.
Could you also go back to the map of the plant area itself so we can see where those domes are?	The Project Team displayed slide 26 of the Public Meeting #2 presentation.
your voice is getting more and more quiet	N/A
Did Jasper say that RDFs are not being considered for use in Picton? The first presentation slides said it was. Have the plans changed? If not, what should we expect if the chart was based on one sample and it was not a good result?	The Project Team provided clarification in that RDFs are being considered however the Project Team has not yet identified a source in Ontario. The Project Team has tested one sample that is going to be used at the Lehigh Plant in Alberta. There is some variability between sample to sample of ALCFs with regard to the amount of biogenic carbon in each sample. As more samples are tested, it is expected that the RDF ALCFs will be closer to 50 kg CO2/GJ.which is less than the coal and petcoke currently used, and would be considered an acceptable ALCF under O. Reg.79/15
Earlier in the presentation.	N/A
The map is earlier in the presentation.	N/A
How do ALCF emissions compare to natural gas? Natural gas was not on the CO2 Emission Intensity Assessment chart so why the focus on the comparison to coal and petcoke versus natural gas, or is natural gas, especially as compared to ALCFs, cost-prohibitive?	The use of ALCFs will be used as fuel for the main burner. The main burner on the kiln uses natural gas for preheating and typically only uses coal or petcoke for production of clinker. The use of ALCFs would be replacing coal or petcoke. The facility is also undertaking efforts to utilize natural gas which is being done by the commissioning of a new burner being installed on the kiln riser. The kiln riser today only uses coal so the natural gas system will be replacing that coal (approximately 25% of the current coal usage (i.e., thermal load)). The ALCFs will only be replacing coal and petcoke as such, these ALCFs are only being compared to coal and petcoke.
Thank you for pointing out where storage and conveyor will be.	N/A
Do you have plant data from elsewhere that actually shows D&F levels unchanged as a result of using ALCF to replace coal/coke?	Yes, RDFs are well documented and studied in Canada and Europe.
What does negligible mean on all the other categories? Will it impact the health of the community? My girls and in-laws live across the Bay, is Heidelberg/Lehigh and its advisors (the presenters tonight), as well as all the actual presenters in their individual capacities saying that they will not be impacted health-wise from the burning of ALCFs? What assurances can Lehigh, its advisers, and you all speaking on their behalf as individuals give us that using ALCFs will not result in our children breathing toxic fumes? MECP air qualities are irrelevant if our families get sick; are Heidelberg/Lehigh, its advisors, and the presenters willing to put their reputations on the line and say this is perfectly safe?	<p>There is a process that MECP prescribes referred to as an emission threshold that has very conservative dispersion modelling factors. This means that if you model the actual emissions they would be much lower than the modeling dispersion factors. By going through the MECP prescribed process, if the emissions estimates comes out as negligible it means that these emissions can be screened out as they do not come close to the conservative thresholds for these emissions.</p> <p>We can appreciate your concern for your family and community and take your questions very seriously. Many of the employees, including the management team were raised and continue to live in the Picton area. The research and work that has been done to date is extensive and is sound based on our profession experience as team in the air emissions and air quality field and working in the cement industry for a long time.</p>

Recorded Question or Comment	How Question or Comment Was Addressed
	<p>The air limits set by the MECP under O. Reg. 419/05 are protective of human health and the environment. Below these limits indicates that there are no impacts of concerns. Based on the data we have to date, all contaminants that have the potential to be emitted will be below their air limits off property. This is based on conservative emission estimates and conservative dispersion modelling. This means that our estimates are likely higher than what would occur.</p> <p>To answer question on negligible, to reduce modelling effort within an ESDM Report, the MECP allows for screening out contaminants with low emission rates relative to their air limit using the Emission Threshold method. Emissions that are below this criteria are considered “negligible” If we modelled these negligible compounds they would be less than 0.05% of the limit, and therefore well below any levels of concern. There can be several contaminants emitted from a kiln but only a handful are require mitigation, such as particulates, NOx and SO<sub>2</sub>.</p>
Is the NAAP a voluntary initiative or driven by a regulator?	The Noise Abatement Action Plan (NAAP) came about as a result of updating the permit in October 2019. Through this process and new standards, a noise model from the facility was developed. The results of the noise model indicated that a NAAP was required. In working with MECP, this action plan was developed where annual requirements are listed in the NAAP as a prerequisite as part of the permit.
Does the noise assessment take into account the decrease in noise from the use of coal and petcoke? Hopefully that would be a net positive.	The noise model modelled the increase in noise including the new equipment. While there may be less runtime of coal and petcoke as a result of using ALCFs, the model was showing the addition of the new equipment because there will be times where the coal system is running as well as the ALCF system as there is only a maximum of 30% replacement with ALCFs at the 200 tonnes per day.
So, basically if threshold is 100 and the current levels is 1, it can go up to 99 and still be admissible	The model approach must demonstrate conservatism. 99 is not necessarily okay all of a sudden. Typically, there would be some sort of abatement requirement to not operate at 99 during normal operating conditions. The Lehigh Picton Plant operates significantly lower than 99 for each of these limits. Stack testing takes place during transitional and normal periods in order to have a representative model.
Will the actual results and reports on emissions, noise, and traffic be publicly available?	Yes. Upon completion of the Consultation Report and the technical reports, these reports will be uploaded to the Project website. A Notice will be sent out to notify the public that these reports are available for review.
Thanks for your commitment!	N/A
Thank you for your patience with my questions as I was conveying questions from a number of colleagues that could not attend in person.	N/A



Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant – Public Meeting #2 – Microsoft Teams Webinar Email Questions

Recorded Question or Comment	How Question or Comment Was Addressed
Is burning these fuels any less carbon intensive or just a way to get around the Gov't counting the emissions from the alternate fuels in your carbon footprint?	Per O. Reg. 79/15, the accounting of greenhouse gas emissions must take into consideration the biological carbon content in order to assess the greenhouse gas reductions from using these ALCFs. In order to use any of the proposed ALCFs, the greenhouse gas emissions must be lower than that of coal or petcoke of which it replaces. These ALCFs are indeed less carbon intensive than coal or petcoke.
How do the values in your table on page 48 of worst case scenario using Alt Fuels compare to the current plant configuration - same worst case scenario?	<p>We carried out a very conservative mass balance assessment that was presented and discussed on slides 42 to 47 of the Public meeting #2. With ALCFs the Facility remains in compliance with contaminants considered in the assessment.</p> <p>We completed a comparison of the composition of the existing coal and petcoke fuels to the various ALCFs that are being considered. Any component of the ALCF that was found to be higher in the ALCFs, an emission rate was either scaled based on the increase in mass entering the kiln or a new emission rate was estimated. 23 contaminants were assessed to having the potential to be emitted at higher rates with ALCFs in comparison to coal and petcoke. However, as mentioned above, the Facility is in compliance with the MECP air limits off-property. These increases are minor increases in POI concentrations that ranged from less than 1% to 14%. Therefore, many components of the emissions decrease including GHG emissions while some components increase from a marginal POI concentration.</p> <p>A full description of the methods used to assess the ALCF emissions is provided in the ESDM Report that is posted publicly and includes a detailed appendix describing the methods used to estimate and the % differences in the point of impingements concentrations for the existing case vs the future case using ALCFs.</p>
It appears that you will now be burning 10MT more material that goes up the stack (so to speak). My concern is not CO2 but all the other emissions, particulates, odours, ??? Won;t this results in some increase	The materials which are foreseen to brought to site are non-odourous and dry. They will be stored in an enclosed building and transported in an enclosed conveyor. Particulates can be generated through the delivery of the supply. In order to mitigate this, the Project Team has designed an enclosed storage and conveyor system and has developed a best practice plan. Particulates can also be generated from the stack. This was modelled and shown as solid particulate matter (SPM). There are capacity monitors on the stack to ensure that SPM are not continuously emitted above the guideline thresholds.
Will burning fluff not cause more fly emissions than burning hard coal? Stack emissions - small particles from the fluff burning.	Fly emissions are not a concern from a cement plant like other sources of solid fuel combustion/incineration. Due to the nature of cement kilns and the material pre-heating process, any potential ash material would not make its way to the final exhaust and would end up in the final product of clinker. This is a result of the exhaust passing through the raw materials – any particulate/flyash would be “scrubbed” and bound up in the raw meal entering the kiln.
How can this be considered a public meeting if there is such limited method to communicate?	Following Public Meeting #2, the Project Team emailed attendees of the meeting inviting them to an open-house at the Lehigh Picton Cement Plant on Wednesday, August 31, 2022 to discuss any questions from Public Meeting #2 or the project overall.
I have a question regarding the process described. There was no mention of monitoring exhaust emissions, specifically, combusted plastics and other non-organic micromaterials?	We have a completed a desktop review of the composition materials for the metals and inorganics. For any by-products that could be emitted from combusting plastics, such as dioxins and furans, volatile organic compounds and polycyclic aromatic hydrocarbons, these are more a result of the combustion conditions, rather than the fuel specifically. We provided a slide indicating the operating temperature and residence times of the kiln when the ALCFs will be used. ALCFs will not be used during start up and shutdown of the kiln to reduce the formation of these types of compounds. It is not anticipated that the ALCFs will result in an appreciable change in these types of emissions from the current fuel source of coal and petcoke.
Will you be sending the participants copies of the presentation? There are many emissions related details that I would like to review further.	Yes. PDFs of the presentation will be uploaded to the Project website within the next few days: <a href="http://lehighpictonalcf.ca/">http://lehighpictonalcf.ca/</a>
Does “worst case scenario” include the possibility/likelihood of unplanned plant outages?	An unplanned plant outage would result in the stoppage of equipment. In which case if any of the interlocks are not satisfied because of a plant outage, the ALCF system would shut off. As a result, there would be nothing that has not already been modelled because we would not be using ALCFs. Any pre-existing condition from an unplanned power outage would be similar after ALCFs as it was before because the system would automatically shut down.

**APPENDIX E**

# Correspondence Summary Table

Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

Communication Date	Communication Method	Communication Location	Stakeholder Group	Individual Stakeholder Contact(s)	Stakeholder Position	Team Members Involved	Category	Summary of Communication
January 10, 2022	Meeting	Virtual	Agency	Shareen Han; Header Merza, Sushant Agarwal; Neryed Ragbar, Denton Miller; Shealyn Mailey and Alex Baldassi	MECP Permission and Program Services Unit	Nektarios (Nick) Papanicolaou, Carsten Schraeder, Jasper van de Wetering, Melissa Eaton, Ray Nobles, and Dave Melcher (Lehigh); Sean Capstick, Jamie McEvoy, and Kyla Suchovs (WSP Golder)	Pre-Submission Meeting	<p>Project Team members from Lehigh and WSP Golder attended a pre-submission meeting with staff from MECP Permission and Program Services Unit to provide an overview of the Site, including the current approvals and confirm next steps in obtaining permanent approval to use ALCFs.</p> <p>Lehigh discussed the application process, including the approach for public meetings, supporting documentation for the amendment ECA application, and timing of the amendment ECA application approval. Lehigh indicated they will move forward with the O. Reg. 79/15 Amendment ECA Application.</p>
March 1, 2022	Meeting	Virtual	Agency	Kate MacNaughton (Ward 1 [Picton] Councillor); John Hirsch (Ward 9 [South Maryburgh] Councillor); Public Representatives: Jane Lesslie (Chair), Angus Ross, Ewa Bednarczuk, Geoff Burt, Vanessa Lavender; Albert Paschkowiak (Environmental Services & Sustainability Supervisor – Prince Edward County); Stacey Hammond (Council & Committee Coordinator – Prince Edward County)	Environmental Advisory Committee, Prince Edward County	Nektarios (Nick) Papanicolaou, Carsten Schraeder, and Ray Nobles (Lehigh); Jamie McEvoy (WSP Golder)	Requested by Prince Edward County	<p>Project Team members from Lehigh and WSP Golder attended Prince Edward County's Environmental Advisory Committee meeting at their request. A question was raised regarding Lehigh's approach to scrubbing emissions on Alternative Low Carbon Fuels (ALCFs) to which N. Papanicolaou indicated that they primarily use lime which is a very good scrubber on its own and that they are continually exploring new options. A question was raised regarding the source for refuse-derived fuel (RDF) to which R. Nobles indicated that there are no facilities producing RDF in the Ontario market, however there are some in western Canada and in Europe. A question was raised regarding heat reclamation / recovery and units of measurement to which N. Papanicolaou indicated that O.Reg. 79/15 describes the eligibility of substitute fuels which must be lower in greenhouse gas (GHG) emission than what is currently being used (i.e., coal and petcoke). This is measured in percent reduction or tonnes. The current methodology looks at how much fuel is used (input) and what the carbon and heat output is of that fuel. J. McEvoy indicated that calculations are very detailed and prescribed and that St. Mary's Cement has done CO<sub>2</sub> intensity reports using the same process if the Committee is interested in looking at that to get an idea of what it looks like. N. Papanicolaou indicated that Lehigh does not do onsite power generation but that they are continually exploring new ways to reduce GHGs. C. Schraeder explained that Lehigh is taking other actions to reduce emissions including the use of limestone which results in no CO<sub>2</sub> production thereby successfully eliminating 10-12% of their overall carbon output. Lehigh uses the heat output to dry its raw materials and as plans to meet with a cooler supplier in the near future who will promote their way of using exhaust gases from coolers to power a generator for the small amount of energy they use. Lehigh is also looking at converting CO<sub>2</sub> to make other things and replacing other fuel sources. A question was raised regarding international success using ALCFs to which N. Papanicolaou indicated that it is fair to say that North America is further behind on this initiative. Overseas, some are achieving up to 100%. With regard to incentives, N. Papanicolaou indicated that carbon tax is increasing by 2030 so actions today are important to remain competitive. A comment was made regarding capturing CO<sub>2</sub> to convert to bio-fuel to which N. Papanicolaou indicated that he is aware and understands it to be a pilot project. Lehigh is considering all options including capturing the emissions and having them taken off-site to be processed into different uses. A question was raised regarding how much RDF material is needed</p>

Communication Date	Communication Method	Communication Location	Stakeholder Group	Individual Stakeholder Contact(s)	Stakeholder Position	Team Members Involved	Category	Summary of Communication
								to operate the plant to which N. Papanicolaou indicated that their permit is such that they received ready-to-use fuels and any change to that would require a new permit. Currently the permit is for the use of 200 tonnes per day of ALCFs. A comment was made regarding timeline to which N. Papanicolaou indicated that Lehigh will be hosting two public meetings as part of their stakeholder engagement and completing technical reports with the formal submission of the permit application to the Ministry is expected by July 2022. A 6-month to 8-month wait is expected to obtain a formal permit approval from MECP. Subsequently, Lehigh will investigate digging, permits to consume, contracts for logistics to bring fuels to site etc. Some additional actions can happen concurrently but some will take additional time after the formal permit approval is received. A question was raised regarding how often Lehigh has collaborated with the municipality and if any relationships were established to which N. Papanicolaou indicated that this is a combined federal, provincial and municipal goal. Lehigh has met with MPP Todd Smith and has had dialogue at the provincial level as well. Lehigh would welcome a collaborative relationship with the municipality. A. Paschkowiak (Environmental Services & Sustainability Supervisor, Prince Edward County) expressed interest in exploring synergies with his current project for the County as well as with other surrounding municipalities.
March 17, 2022	Newspaper	N/A	Public	Public	Public	N/A	Notice of Intent to Apply and Notice of Public Meeting #1	The Notice of Intent to Apply under Ontario Regulation 79/15 and invitation to Public Meeting #1 was published in the <i>Picton County Weekly News</i> and <i>Picton Gazette</i> newspapers.
March 17, 2022	Email	N/A	Indigenous Communities	Chief Dave Mowat; Dave Simpson; Chief Emily Whetung-MacInnes; Julie Kapyrka; Kaitlin Hill; Chief Laurie Carr; Tom Cowie; Sean Davidson; Chief Kelly LaRocca; Waverly Birch; Chief R. Donald Maracle; Charlotte Gurnsey; Chief Kris Nahrgang; Karry Sandy-McKenzie	Alderville First Nation; Curve Lake First Nation; Hiawatha First Nation; Mississaugas of Scugog Island First Nation; Mohawks of the Bay of Quinte First Nation; Kawartha Nishnawbe; William Treaties First Nations	LehighPictonALCF@golder.com (WSP Golder)	Notice of Intent to Apply and Notice of Public Meeting #1	K. Suchovs (WSP Golder, on behalf of Lehigh) emailed Indigenous community contacts the Notice of Intent to Apply under Ontario Regulation 79/15 and invitation to Public Meeting #1. K. Suchovs noted that Lehigh considers engagement with Indigenous communities a critical component of the Project planning and development of environmental studies. K. Suchovs noted that Lehigh would be pleased to arrange a meeting to gather the community's input and discuss the Project details. Email sent to Chief R. Donald Maracle was undeliverable due to error in email address; the Notice was resent to the correct email address on April 6, 2022 via the Project Team email.
March 17, 2022	Email	N/A	Federal Government Agencies	Fisheries Protection Program; EA Program, Ontario Region; Jennifer Hughes; Rob Dobos; Cynthia Brown	Fisheries and Oceans Canada; Transport Canada; Environment Canada; Indigenous and Northern Affairs Canada	LehighPictonALCF@golder.com (WSP Golder)	Notice of Intent to Apply and Notice of Public Meeting #1	K. Suchovs (WSP Golder, on behalf of Lehigh) emailed federal government contacts the Notice of Intent to Apply under Ontario Regulation 79/15 and invitation to Public Meeting #1. Email sent to Rob Dobos, Environment Canada was undeliverable and a replacement for this individual was not found.

Communication Date	Communication Method	Communication Location	Stakeholder Group	Individual Stakeholder Contact(s)	Stakeholder Position	Team Members Involved	Category	Summary of Communication
March 17, 2022	Email	N/A	Provincial Government Agencies	Shareen Han; Header Merza; Denton Miller; Shushant Agarwal; Alex Baldassi; Shealyn Mailey; Jeffrey McKerral; Trevor Dagilis; Cathy Chisholm; Melanie Needham; Neryed Ragbar; Hon. Todd Smith; Krystyn Ordyniec; Aldo Ingradaldi; Dan Ethier; Hal Leadlay; Deanna Cotter; Catherine Warren; Katie O'Connell; Andrew Ogilvie; Darlene Dove; Jennifer Graham Harkness; James Hamilton; Jack Mallon; Hon. Sylvia Jones; Samantha Gomez; Office of the Auditor General of Ontario; Brad McNevin; Paul McCoy	Ministry of the Environment, Conservation and Parks; Ministry of Energy; Ministry of Indigenous Affairs; Ministry of Municipal Affairs and Housing; Ministry of Northern Development, Mines, Natural Resources and Forestry; Ministry of Transportation; Ministry of Citizenship and Multiculturalism (formerly Ministry of Tourism, Culture and Sport); Ministry of the Solicitor General; Ministry of Labour, Training and Skills Development; Office of the Auditor General; Quinte Conservation Authority	LehighPictonALCF@golder.com (WSP Golder)	Notice of Intent to Apply and Notice of Public Meeting #1	K. Suchovs (WSP Golder, on behalf of Lehigh) emailed provincial government contacts the Notice of Intent to Apply under Ontario Regulation 79/15 and invitation to Public Meeting #1. Email sent to Aldo Ingradaldi, Ministry of Municipal Affairs and Housing was undeliverable and a replacement for this individual was not found.
March 17, 2022	Email	N/A	Municipal Government	Catalina Blumenberg; Anne Kantharajah; Marcia Wallace; Theresa Collins-Ruban; Peter Moyer; Andy Harrison; Jeff Bryans; Albert Paschkowiak; Michael Michaud; Mark Kerr	Prince Edward County	LehighPictonALCF@golder.com (WSP Golder)	Notice of Intent to Apply and Notice of Public Meeting #1	K. Suchovs (WSP Golder, on behalf of Lehigh) emailed municipal government contacts the Notice of Intent to Apply under Ontario Regulation 79/15 and invitation to Public Meeting #1.
March 17, 2022	Email	N/A	Elected Officials	Ryan Williams; Hon. Todd Smith; Mayor Steve Ferguson; Joy McLeod; Councillor Kate MacNaughton; Councillor Phil St-Jean; Councillor Brad Nieman; Councillor Phil Prinzen; Councillor Bill Roberts	MP – Bay of Quinte; MPP – Bay of Quinte; Prince Edward County Elected Officials	LehighPictonALCF@golder.com (WSP Golder)	Notice of Intent to Apply and Notice of Public Meeting #1	K. Suchovs (WSP Golder, on behalf of Lehigh) emailed the local MP, MPP, and Prince Edward County Elected Officials the Notice of Intent to Apply under Ontario Regulation 79/15 and invitation to Public Meeting #1.
March 17, 2022	Website	N/A	Public	Public	Public	N/A	Notice of Intent to Apply and Notice of Public Meeting #1	The Project Team uploaded the Notice of Intent to Apply under Ontario Regulation 79/15 and invitation to Public Meeting #1 to the Project website.
March 17, 2022	Email	N/A	Member of the Public	Member of the Public	Member of the Public	LehighPictonALCF@golder.com (WSP Golder)	Contact List	A member of the public emailed the Project Team to request to be added to the Project contact list. The Project Team added the member of the public to the Project contact list.
March 17, 2022	Email	N/A	Member of the Public	Member of the Public	Member of the Public	LehighPictonALCF@golder.com (WSP Golder)	Contact List	A member of the public emailed the Project Team to request to be added to the Project contact list. The Project Team added the member of the public to the Project contact list.
March 17, 2022	Email	N/A	Indigenous Community	Waverly Birch	Mississaugas of Scugog Island First Nation (MSIFN)	LehighPictonALCF@golder.com (WSP Golder)	Notice of Intent to Apply and Notice of Public Meeting #1	W. Birch emailed the Project Team noting the MSIFN's interest in learning more about the project. W. Birch requested the Project Team's availability for a 30-minute introductory call. The Project Team noted that the Project Team would be pleased to meet with the MSIFN. The Project Team requested the MSIFN's availability for a one-hour meeting. The Project Team also advised of the first Public Meeting occurring on April 7, 2022 from 6-8 pm.



Communication Date	Communication Method	Communication Location	Stakeholder Group	Individual Stakeholder Contact(s)	Stakeholder Position	Team Members Involved	Category	Summary of Communication
March 18, 2022	Email	N/A	Agency	Catalina Blumenberg	Prince Edward County	LehighPictonALCF@golder.com (WSP Golder)	Notice of Intent to Apply and Notice of Public Meeting #1	C. Blumenberg emailed the Project Team to acknowledge receipt of the Notice and to advise that the Notice will be shared with members of Council and the Environmental Advisory Committee. Project Team response was not required.
March 24, 2022	Newspaper	N/A	Public	Public	Public	N/A	Notice of Intent to Apply and Notice of Public Meeting #1	The Notice of Intent to Apply under Ontario Regulation 79/15 and invitation to Public Meeting #1 was published in the <i>Picton County Weekly News</i> and <i>Picton Gazette</i> newspapers.
March 24, 2022	Canada Post Neighbourhood Mail <sup>TM</sup> (unaddressed mail)	N/A	Public	Public	Public	N/A	Notice of Intent to Apply and Notice of Public Meeting #1	The Notice of Intent to Apply under Ontario Regulation 79/15 and invitation to Public Meeting #1 was delivered to approximately 5,953 property owners in Picton, Ontario.
March 29, 2022	Email	N/A	Member of the Public	Member of the Public	Member of the Public	LehighPictonALCF@golder.com (WSP Golder)	ALCF General Inquiry	<p>A member of the public emailed the Project Team to request further information on the ALCF system related to emissions, power generation, on-site storage, and noise level. The Project Team responded by noted the following:</p> <ul style="list-style-type: none"><li>▪ From a carbon dioxide emissions perspective, the use of ALCF fuels will reduce carbon dioxide emissions in comparison to the conventional fuels of petcoke and coal.</li><li>▪ Emissions from the kiln are controlled using an electrostatic precipitator (ESP) and the bypass stack is controlled with a fabric filter dust collector. Additionally, the kiln is equipped with a preheater tower where the raw meal is pre-heated prior to the calcination step in the kiln. The raw meal acts as an inherent scrubber capturing the products of combustion where they are re-entrained within the kiln and preheater.</li><li>▪ No new on-site generators are required.</li><li>▪ The proposed installation of a storage / material handling building, which will reduce any potential impacts of dust, noise, odour and SWM runoff.</li><li>▪ The ALCF equipment is not anticipated to generate significant noise. An acoustic model of the noise sources will be done to ensure noise is mitigated to meet applicable noise standards. The installation of equipment for the use of ALCF is small in relation to the existing equipment.</li></ul>
March 29, 2022	Email	N/A	Member of the Public	Member of the Public	Member of the Public	LehighPictonALCF@golder.com (WSP Golder)	General Support / Contact List	A member of the public emailed the Project Team noting that this is a great idea if it is done under the correct environmental controls for emissions and pollution and generally provided support for the Project. The Project Team responded by thanking the member of the public for their support and notifying them that they had been added to the Project contact list.



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March 29, 2022	Email	N/A	Member of the Public	Member of the Public	Member of the Public	LehighPictonALCF@golder.com (WSP Golder)	ALCF General Inquiry	A member of the public emailed the Project Team asking what the main type of ALCF is being considered for use. The Project Team responded that many sources of ALCFs are being considered and the preferred source will be from processed non-recyclable construction and demolition materials. Additional ALCFs that could be used at Lehigh Picton Cement Plant include ALCF from Industrial, Commercial, and Instructional materials, ALCF from combustible fraction of non-recyclable household waste, and discarded treated seeds. The Project Team noted that obtaining ALCFs is a dynamic process and will be managed on an ongoing-basis. The Project Team also advised the member of the public that they had been added to the Project contact list.
March 30, 2022	Email	N/A	Member of the Public	Member of the Public	Member of the Public	LehighPictonALCF@golder.com (WSP Golder)	ALCF General Inquiry	A member of the public emailed the Project Team asking about noise impacts, if any, would there be if the application is approved. They also noted their concern with the current noise level and potential increase of noise due to this Project. The Project Team responded by noting that Lehigh is currently working under a Noise Abatement Action Plan and annually implementing actions to improve the current noise levels at the facility; and that ALCF project equipment will be small in relation to the existing plant equipment and designed for mitigating any potential noise concerns. The Project Team noted that as part of the permit application process Lehigh is required to study noise impact of any new equipment and demonstrate compliance with noise standards. The Project Team encouraged the member of the public to register for the upcoming Public Meeting to learn more. The Project Team also added the member of the public to the Project contact list.
March 30, 2022 / April 8, 2022 / April 9, 2022	Email	N/A	Member of the Public	Member of the Public	Member of the Public	LehighPictonALCF@golder.com (WSP Golder)	ALCF General Inquiry	A member of the public emailed the Project Team requesting a copy of the deputation presentation material that was presented to the Environmental Advisory Committee, Prince Edward County and to be added to the Project contact list. The member of the public followed up with the Project Team via email requesting acknowledgment of the first email. The Project Team responded to the member of the public noting that they had been added to the Project contact list and provided a PDF of the March 1 <sup>st</sup> deputation presentation to the Environmental Advisory Committee, Prince Edward County. The member of the public responded via email thanking the Project Team for the requested material.
April 2, 2022	Email	N/A	Stakeholder	N/A	Prince Edward County Conservancy (County Conservancy)	LehighPictonALCF@golder.com (WSP Golder)	ALCF General Inquiry	The County Conservancy emailed the Project Team noting a variety of questions to seek further information on the ALCF project and requested responses prior to the April 7, 2022 Public Meeting. The key topics expressed in the questions included: technology at the plant; emissions, odour, dust and noise concerns; corporate environmental accountability; insourcing, processing and storage of the ALCFs; fuel use; energy strategy; traffic; and complaint handling. The Project Team met with representatives from the Prince Edward County Conservancy prior to the Public Meeting on April 7, 2022 to provide further details on the ALCF project and answer their questions noted in the email.
April 5, 2022	Email	N/A	Member of the Public	Member of the Public	Member of the Public	LehighPictonALCF@golder.com (WSP Golder)	Contact List	A member of the public emailed the Project Team to request to be added to the Project contact list. The Project Team added the member of the public to the Project contact list.

Communication Date	Communication Method	Communication Location	Stakeholder Group	Individual Stakeholder Contact(s)	Stakeholder Position	Team Members Involved	Category	Summary of Communication
April 6, 2022	Email	N/A	Member of the Public	Member of the Public	Member of the Public	LehighPictonALCF@golder.com (WSP Golder)	ALCF General Inquiry	<p>A member of the public emailed the Project Team expressing concern related to air quality, noise, odours, emissions and water quality in the local bay. The member of the public also for further information on mitigation measures to mitigate any adverse impacts related to the list above, the contents of the fuel sources, whether scrubbing equipment will be installed, how often the Picton Cement Plant experiences unexpected outages resulting in uneven burning cycles that emit harmful emissions, and whether there is another way to achieve reducing Lehigh's carbon footprint other than ALCFs. The Project Team responded by noting the following:</p> <ul style="list-style-type: none"><li>▪ Lehigh continuously monitors emissions as part of its Environmental Compliance Approval (ECA). The use of ALCFs require demonstrating compliance to emissions standards (O. Reg. 419/05) in order to protect the environment and human health. Furthermore, the monitoring and controls on the ALCF system would ensure that ALCF use would occur only during high temperature, normal steady state operation. This monitoring and controls ensure complete combustion of the ALCFs. The list of fuel sources are fully described on the project website: <a href="http://www.lehighpictonalcfc.ca">www.lehighpictonalcfc.ca</a>. Please note, only processed fuels meeting the criteria as defined in the presentation materials would be utilized, this does not include whole car and truck tires, but the possibility of tire fluff. Lehigh is proposing to install a storage and fuel conveyance facility, which will reduce any potential impacts of dust, noise, odour and SWM runoff.</li><li>▪ Described the potential ALCF fuels including Construction and Demolitions (C&amp;D) materials; Industrial, Commercial, and Institutional (IC&amp;I) materials; Refuse Derived Fuel (RDF); and Discarded Treated Seed.</li><li>▪ The use of ALCFs would be monitored and controlled to meet all existing emission limits. No increase in emission limits are considered as part of ALCF use. ALCFs are required to meet existing emission limits while reducing greenhouse gas (GHG) emissions.</li><li>▪ Kiln outage periods planned and unplanned do occur. The Picton plant utilizes natural gas during the pre-heating and early production stages. The use of ALCF's would only occur during normal steady state operation, when the process has high temperature. This control measure would be implemented as part of the application for ALCF use.</li><li>▪ A path to reducing GHG emissions was described in Public Meeting #1. This path includes the increased use of natural gas and ALCFs which are required to have lower GHG emissions as natural gas and ALCFs have lower GHG emissions than that of the coal and petcoke with which it would replace. The biogenic cycle is an important part to reducing GHG emissions in Ontario and the use of ALCFs is a model for GHG reductions already achieved in many other locations.</li></ul> <p>The Project Team added the member of the public to the Project contact list.</p>

Communication Date	Communication Method	Communication Location	Stakeholder Group	Individual Stakeholder Contact(s)	Stakeholder Position	Team Members Involved	Category	Summary of Communication
April 7, 2022	Meeting	Virtual	Stakeholder	Representatives from Prince Edward County Conservancy (County Conservancy)	Prince Edward County Conservancy (County Conservancy)	Nektarios (Nick) Papanicolaou, Carsten Schraeder, Jasper van de Wetering, Roy Nobles, Melissa Eaton, David Melcher (Lehigh); Sean Capstick, Jamie McEvoy, Nadia Dabagh (WSP Golder)	ALCF General Inquiry	The Project Team met with representatives from the County Conservancy prior to the Public Meeting on April 7, 2022 to provide further details on the ALCF project and answer their questions noted in the April 2, 2022 email.
April 7, 2022	Email	N/A	Member of the Public	Member of the Public	Member of the Public	LehighPictonALCF@golder.com (WSP Golder)	Public Meeting #1	A member of the public emailed the Project Team inquiring whether questions could be asked during the webinar. The Project Team addressed this question at the beginning of Public Meeting #1 and instructed the audience on how to submit questions during the webinar. The Project Team added the member of the public to the Project contact list.
April 7, 2022	Email	N/A	Member of the Public	Member of the Public	Member of the Public	LehighPictonALCF@golder.com (WSP Golder)	ALCF General Inquiry	A member of the public emailed the Project Team noting that they would be unable to attend Public Meeting #1 and inquired about the impact of ALCFs on the quality of life for all near Picton Bay. The Project Team noted that Lehigh is proud to be a part of the community and that it is not foreseen that the use of ALCFs would impact quality of life for neighbours. The project Team also noted that the use of ALCFs is one step towards reducing GHG emissions and would reduce the use and reliance of fossil fuels, a common goal for all neighbours. The Project Team added the member of the public to the Project contact list.
April 7, 2022	Email	N/A	Stakeholder	N/A	Prince Edward County Conservancy (County Conservancy)	LehighPictonALCF@golder.com (WSP Golder)	ALCF General Inquiry	Following the virtual meeting with the County Conservancy earlier on April 7, 2022, the County Conservancy emailed the Project Team providing an article by Zero Waste Europe which recommends the exclusion of Refuse Derived Fuels in cement plants. The Project Team provided a letter response to the article's four main conclusions and noted that the possible issues raised by Zero Waste Europe do not apply to the ALCF application at Lehigh Picton Plant and the concerns are prevented / considered as part of the conditions of O. Reg. 79/15 on July 11, 2022 via the Project Team email.
April 7, 2022	GoToWebinar Virtual Meeting	GoToWebinar	Public	Public	Public	Lehigh, WSP Golder	Public Meeting #1	Public Meeting #1 was held as a virtual information session (webinar) from 6:00 p.m. to 8:00 p.m. The meeting consisted of a presentation given by members of the Project team and questionandanswer periods scattered throughout. Sixty-eight (68) individuals registered to attend the virtual information session. Forty-nine (49) individuals attended the virtual information session. A total of eighty-four (84) questions / comments were received during the meeting and were answered live by members of the Project Team. These questions / comments are presented in Appendix D.

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April 8, 2022	Email	N/A	Member of the Public	Member of the Public	Member of the Public	LehighPictonALCF@golder.com (WSP Golder)	Public Meeting #1	A member of the public emailed the Project Team noting that they did not receive an answer to their question that was submitted during the Public Meeting regarding if Lehigh was paying for the local limestone and how much. The member of the public also noted their general support for the Project but noted that the reduction on CO <sub>2</sub> emissions would not be significant but worth pursuing, nonetheless. The Project Team did respond to this question during Public Meeting #1. The Project Team provided a written response to this email that noted that Lehigh owns and operates its own quarry on site; therefore, Lehigh pays operation and maintenance costs to operate the quarry and the applicable TOARC fees and land taxes. The Project Team agreed that the efforts to reduce GHG emissions is worth pursuing. The Project Team added the member of the public to the Project contact list.
April 8, 2022	Email	N/A	Member of the Public	Member of the Public	Member of the Public	LehighPictonALCF@golder.com (WSP Golder)	Public Meeting #1	A member of the public emailed the Project Team inquiring about the high temperatures needed in the cement kiln and whether using ALCFs will achieve the needed temperature, and whether natural gas is still needed to ensure the temperature is attained. The Project Team responded by noting that the production of clinker in the kiln requires achieving very high temperatures, nearly 2000 degrees Celsius to produce clinker. The use of ALCFs would supplement the use of primary fuels; coal, petcoke or natural gas. The application for ALCFs at Lehigh Picton would account for up to 35% of the total heat required to produce clinker and will maintain the high temperatures needed to maintain the product quality required by the high temperatures. The Project Team added the member of the public to the Project contact list.
April 10, 2022	Email	N/A	Member of the Public	Member of the Public	Member of the Public	LehighPictonALCF@golder.com (WSP Golder)	General Support	A member of the public emailed the Project Team noting their general support for the Project. The Project Team responded by thanking the member of the public for their support and notifying them that they had been added to the Project contact list.
April 10, 2022	Email	N/A	Indigenous Community	Samantha Shrubsole	Mississaugas of Scugog Island First Nation (MSIFN)	LehighPictonALCF@golder.com (WSP Golder)	Notice of Intent to Apply and Notice of Public Meeting #1	MSIFN provided two available dates and requested that the Project Team send the virtual meeting invitation. The Project Team responded by noting a separate email meeting invitation would be sent for April 22, 2022 at 1 pm.
April 13, 2022	Email	N/A	Member of the Public	Member of the Public	Member of the Public	LehighPictonALCF@golder.com (WSP Golder)	Contact List	A member of the public emailed the Project Team noting their new email address. The Project Team noted that the new email address had been added to the Project contact list.
April 14, 2022	Email	N/A	Agency	Jack Mallon	Ministry of Citizenship and Multiculturalism (MCM) (formerly known as the Ministry of Tourism, Culture, Sport (MTCS))	LehighPictonALCF@golder.com (WSP Golder)	Notice of Intent to Apply and Notice of Public Meeting #1	MCM provided a letter to the Project Team via email expressing that the proponent is required to determine a project's potential impact on known (previously recognized) and potential cultural heritage resources under the ECA process. MCM noted that the ECA project may impact archaeological resources and should be screened using the MCM Criteria for Evaluating Archaeological Potential and Criteria for Evaluating Marine Archaeological Potential to determine if an archaeological assessment is needed. MCM also noted that a Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment is required to be conducted for the entire study area during the planning phase and will be summarized in the ECA Report. MCM also noted that all technical cultural heritage studies and their recommendations are to be addressed and incorporated into ECA projects. MCM noted that they are to be advised whether any technical cultural heritage studies will be completed for this ECA project, and provided them to MCM before issuing a Notice of Completion or commencing any work on the site. If screening has



Communication Date	Communication Method	Communication Location	Stakeholder Group	Individual Stakeholder Contact(s)	Stakeholder Position	Team Members Involved	Category	Summary of Communication
								<p>identified no known or potential cultural heritage resources, or no impacts to these resources, please include the completed checklists and supporting documentation in the ECA report or file.</p> <p>The Project Team responded seeking clarification on the scope of work and outlining the proposed infrastructure footprint associated with the project. The Project Team noted that a new storage / material handling facility will be constructed within the active cement plant as part of the ALCF project. The storage facility will be confined to a 0.5-1 hectare (ha) area within the plant in close proximity to the kiln system. The ALCFs project footprint is small in relation to the facility size and will not result in ground disturbance to other areas within the property. All ground disturbance will be confined to areas of previous disturbance within the active cement plant. The Project Team noted that the Picton Cement Plant (1958) was constructed prior to the enactment of the <i>Ontario Heritage Act</i>, 1990; and no archeological assessments would have been completed at the time under the <i>Aggregate Resources Act</i>. As such, a Stage 1 Archaeological Assessment and/or Cultural Heritage Report have not been produced for the property. The Project Team inquired if it is still MCM's recommendation to proceed with a Cultural Heritage Report knowing that the ground disturbance will not be extended beyond an area previously disturbed within the active cement plant. The Project Team noted that it is our belief that this project does not require an Archaeological Assessment but would like clarification as to whether a Cultural Heritage Report is required given the nature of the proposed disturbance.</p> <p>The Project Team followed up with MCM on a response on July 15 and August 16, 2022.</p>
April 20, 2022	Email	N/A	Indigenous Community	Chief Emily Whetung; Kaitlin Hill; Julie Kapyrka	Curve Lake First Nation (CLFN)	LehighPictonALCF@golder.com (WSP Golder)	Notice of Intent to Apply and Notice of Public Meeting #1	<p>CLFN emailed the Project Team advising that the project is proposed to be situated within the Traditional Territory of CLFN and of their file fee to review the project. CLFN requested a summary statement including how the project will address the following areas of concern to the First Nation within their Traditional and Treaty Territory: possible environmental impact to drinking water; endangerment to fish and wild game; impact on Aboriginal heritage and cultural values; and to endangered species; lands; savannas etc. CLFN also noted that the Project Team would make arrangements to discuss the matter in more detail with CLFN once the information provided has been reviewed. Curve Lake noted their particular concern for the remains of their ancestors and noted that they should be notified without delay if excavation unearthed bones, remains, or other such evidence of a native burial site or any other archaeological findings. Lastly, CLFN advised that they expect engagement at the Stage 1 of an Archaeological Assessment.</p> <p>The Project Team responded via email on June 10, 2022 noting that the file fee had been paid on May 5, 2022 and that no impacts to drinking water, fish and wild game, Aboriginal heritage and cultural values, and endangered species, lands, savannas, etc. were anticipated as part of this project. The Project Team noted that the land use of the study area are designated as aggregate by Prince Edward County and there will be no property impacts or widening of Highway 49. The Project Team noted that no Stage 1 Archaeological Assessment are required as part of this project at this time and should a Stage 1 Archaeological Assessment be deemed required CLFN would be engaged. The Project Team noted that</p>

Communication Date	Communication Method	Communication Location	Stakeholder Group	Individual Stakeholder Contact(s)	Stakeholder Position	Team Members Involved	Category	Summary of Communication
								the completion of the consultation and submission of the ALCF application to MECP is anticipated for Q3 2022. The Project Team noted that they would be happy to meet with CLFN to discuss this project and look to benefit from Indigenous Knowledge that CLFN is willing to share and requested the earliest possible date and time that CLFN would be available to meet with the Project Team.
April 22, 2022	Microsoft Teams	Virtual Meeting	Indigenous Community	Waverly Birch; Don Richardson	Mississaugas of Scugog Island First Nation (MSIFN)	Nektarios (Nick) Papanicolaou, Ray Nobles (Lehigh); Jamie McEvoy, Jeremiah Pariag, Nadia Dabagh (WSP Golder)	Indigenous Community Engagement	The Project Team had an introductory call with representatives of the MSIFN. The Project Team presented an overview of the project and process timeline and the representatives of the MSIFN were provided the opportunity to ask questions about the project. A summary of the meeting was provided to all attendees on June 10, 2022 with specific responses to the MSIFN questions/comments that were answered during the meeting as well as following the meeting.
May 11, 2022	Meeting	Virtual	Agency	Shareen Han; Sushant Agarwal; Neryed Ragbar, Nancy Orpana Shealyn Mailey, Jan Kowalczyk	MECP Permission and Program Services Unit	Nektarios (Nick) Papanicolaou (Lehigh); Sean Capstick, Jamie McEvoy, Jeff Zywicki (WSP Golder)	Pre-Submission Meeting	<p>The Project Team this meeting with the MECP to discuss the roadmap for SO<sub>2</sub> compliance while also seeking ALCFs. This is summarized below:</p> <ul style="list-style-type: none"><li>▪ One joint application to be submitted by Q3 2022 for ALCFs (meeting requirements of O. Reg. 79/15) + ECA amendment for SO<sub>2</sub> and Limited Operational Flexibility condition to be reviewed by one air approvals engineer under guidance of Sushant for ALCFs</li><li>▪ Discussed Lehigh's SO<sub>2</sub> abatement report highlighting trials to reduce SO<sub>2</sub> emissions to date</li><li>▪ Kiln 3 and associated conditions to be removed from the future ECA and ESDM Report; if back online in the future an amendment can be submitted.</li><li>▪ The ESDM that is submitted in Q3 for use of ALCFs should include the following:<ul style="list-style-type: none"><li>○ A screening fumigation model is sufficient to show whether the stacks are impacted by shoreline fumigation from the Bay of Quinte.</li><li>○ Description of the CEMS, and other O&amp;M procedures for control equipment</li><li>○ A screening of Guideline A-7 instack Table 2 for ALCFs</li><li>○ Fuel Handling Protocols to indicated storage &amp; handling</li><li>○ Process controls, e.g., interlocks and measuring points.</li><li>○ A description of the SO<sub>2</sub> Abatement activities and status of trials and an indication when the trials are complete.</li></ul></li><li>▪ Lehigh to keep local MECP office apprised as the ALCF project progresses and updates with the SO<sub>2</sub> trials. Lehigh was informed a new local district officer; Mark Lamirande has been assigned to Lehigh.</li></ul>



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May 27, 2022	Email	N/A	Stakeholder	N/A	Prince Edward County Conservancy (County Conservancy)	LehighPictonALCF@golder.com (WSP Golder)	ALCF General Inquiry	The County Conservancy followed up with the Project Team inquiring when they could expect to receive responses to their questions outlined in the April 2, 2022 email and when the Project Team plans to hold Public Meeting #2. The Project Team apologized for the delayed response and noted that the Project Team understood that the private meeting held before Public Meeting #1 where the Project Team addressed the questions was the requested response and where additional information was provided. The Project Team provided individual responses to the County Conservancy questions. The Project Team noted that they appreciated County Conservancy's assistance in the reduction of GHG emissions from the Lehigh Picton Cement Plant. In error, the response was not sent to the County Conservancy; N. Dabagh (WSP Golder, on behalf of Lehigh) provided the Project Team response to County Conservancy.
June 1, 2022	Phone Call	N/A	Indigenous Community	Mohawks of the Bay of Quinte First Nation	Mohawks of the Bay of Quinte First Nation (MBQ)	Jeremiah Pariag (WSP Golder)	Indigenous Community Engagement	J. Pariag attempted to call the Mohawks of the Bay of Quinte First Nation (MBQ) on June 1, 2022 to inquire about their interest in participating in the Project. No response was received.
June 8, 2022	Phone Call	N/A	Indigenous Community	Mohawks of the Bay of Quinte First Nation	Mohawks of the Bay of Quinte First Nation (MBQ)	Jeremiah Pariag (WSP Golder)	Indigenous Community Engagement	J. Pariag attempted to call the Mohawks of the Bay of Quinte First Nation (MBQ) on June 8, 2022 to inquire about their interest in participating in the Project. No response was received.
June 14, 2022	Email	N/A	Stakeholder	N/A	Prince Edward County Conservancy (County Conservancy)	Nadia Dabagh (WSP Golder)	Public Meeting #2	The County Conservancy responded to the N. Dabagh (WSP Golder, on behalf of Lehigh) asking when Public Meeting #2 would be held. The Project Team responded noting that Public Meeting #2 had not been scheduled yet, however the Project Team was hoping to hold Public Meeting #2 in August 2022.
Week of August 1, 2022	Canada Post Neighbourhood Mail™ (unaddressed mail)	N/A	Public	Public	Public	N/A	Notice of Public Meeting #2	The Notice of Public Meeting #2 was delivered to approximately 5,978 property owners in Picton, Ontario.
August 4, 2022	Newspaper	N/A	Public	Public	Public	N/A	Notice of Public Meeting #2	The Notice of Public Meeting #2 was published in the <i>Picton County Weekly News</i> and <i>Picton Gazette</i> newspapers.
August 5, 2022	Email	N/A	Member of the Public	Member of the Public	Member of the Public	LehighPictonALCF@golder.com (WSP Golder); Nadia Dabagh (WSP Golder)	Notice of Public Meeting #2	A member of the public emailed the Project Team requesting to be registered for the webinar. N. Dabagh responded noting that the Project Team had registered them for the webinar.
August 6, 2022	Email	N/A	Member of the Public	Member of the Public	Member of the Public	Nick Papanicolaou (Lehigh)	Notice of Public Meeting #2	A member of the public emailed the Project Team noting that the webinar registration link was not available on the Project website. They also noted that the noise issue discussed with Lehigh in the past is now resolved. N. Papanicolaou responded noting that the registration link had been added to the Project website.
August 6, 2022	Email	N/A	Member of the Public	Member of the Public	Member of the Public	LehighPictonALCF@golder.com (WSP Golder)	General Support	A member of the public emailed the Project Team noting their general support for the Project. The Project Team responded by thanking the member of the public for their support and notifying them that they had been added to the Project contact list.
August 8, 2022	Website	N/A	Public	Public	Public	N/A	Notice of Public Meeting #2	The Project Team uploaded the Notice of Public Meeting #2 to the Project website and added the webinar registration link.
August 8, 2022 / August 12, 2022	Email	N/A	Member of the Public	Member of the Public	Member of the Public	LehighPictonALCF@golder.com (WSP Golder)	Notice of Public Meeting #2	A member of the public emailed the Project Team requesting to be registered for the Public Meeting #2 webinar. N. Dabagh responded noting that she had registered the member of the public for the webinar and that they should receive a confirmation email. The member of the public responded thanking N. Dabagh for her assistance.

Communication Date	Communication Method	Communication Location	Stakeholder Group	Individual Stakeholder Contact(s)	Stakeholder Position	Team Members Involved	Category	Summary of Communication
August 11, 2022	Newspaper	N/A	Public	Public	Public	N/A	Notice of Public Meeting #2	The Notice of Public Meeting #2 was published in the <i>Picton County Weekly News</i> and <i>Picton Gazette</i> newspapers.
August 11, 2022	Email	N/A	Public	Public	Public	N/A	Notice of Public Meeting #2	N. Dabagh (WSP Golder, on behalf of Lehigh) emailed Public contacts the Notice of Public Meeting #2.
August 11, 2022	Email	N/A	Indigenous Communities	Chief Dave Mowat; Dave Simpson; Chief Emily Whetung-MacInnes; Julie Kapyrka; Kaitlin Hill; Chief Laurie Carr; Tom Cowie; Sean Davidson; Chief Kelly LaRocca; Waverly Birch; Chief R. Donald Maracle; Charlotte Gurnsey; Chief Kris Nahrgang; Karry Sandy-McKenzie	Alderville First Nation; Curve Lake First Nation; Hiawatha First Nation; Mississaugas of Scugog Island First Nation; Mohawks of the Bay of Quinte First Nation; Kawartha Nishnawbe; William Treaties First Nations	Nadia Dabagh (WSP Golder)	Notice of Public Meeting #2	N. Dabagh (WSP Golder, on behalf of Lehigh) emailed Indigenous community contacts the Notice of Public Meeting #2. The Notice was resent to Chief Dave Mowat on August 24, 2022 due to technical error.
August 11, 2022	Email	N/A	Federal Government Agencies	Fisheries Protection Program; Jennifer Hughes; Cynthia Brown	Fisheries and Oceans Canada; Indigenous and Northern Affairs Canada	Nadia Dabagh (WSP Golder)	Notice of Public Meeting #2	N. Dabagh (WSP Golder, on behalf of Lehigh) emailed federal government agency contacts the Notice of Public Meeting #2.
August 11, 2022	Email	N/A	Provincial Government Agencies	Shareen Han; Header Merza; Denton Miller; Shushant Agarwal; Alex Baldassi; Shealyn Mailey; Jeffrey McKerral; Trevor Dagilis; Cathy Chisholm; Melanie Needham; Neryed Ragbar; Hon. Todd Smith; Krystyn Ordyniec; Dan Ethier; Hal Leadlay; Deanna Cotter; Catherine Warren; Katie O'Connell; Andrew Ogilvie; Darlene Dove; Jennifer Graham Harkness; James Hamilton; Jack Mallon; Hon. Sylvia Jones; Samantha Gomez; Office of the Auditor General of Ontario; Brad McNevin; Paul McCoy	Ministry of the Environment, Conservation and Parks; Ministry of Energy; Ministry of Indigenous Affairs; Ministry of Municipal Affairs and Housing; Ministry of Northern Development, Mines, Natural Resources and Forestry; Ministry of Transportation; Ministry of Citizenship and Multiculturalism (formerly Ministry of Tourism, Culture and Sport); Ministry of the Solicitor General; Ministry of Labour, Training and Skills Development; Office of the Auditor General; Quinte Conservation Authority	Nadia Dabagh (WSP Golder)	Notice of Public Meeting #2	N. Dabagh (WSP Golder, on behalf of Lehigh) emailed provincial government agency contacts the Notice of Public Meeting #2. Email sent to Jack Mallon, Ministry of Citizenship and Multiculturalism (MCM) was undeliverable and however MCM did receive the Notice via James Hamilton, MCM.
August 11, 2022	Email	N/A	Municipal Government	Catalina Blumenberg; Anne Kantharajah; Marcia Wallace; Theresa Collins-Ruban; Peter Moyer; Andy Harrison; Jeff Bryans; Albert Paschkowiak; Michael Michaud; Mark Kerr	Prince Edward County	Nadia Dabagh (WSP Golder)	Notice of Public Meeting #2	N. Dabagh (WSP Golder, on behalf of Lehigh) emailed municipal government contacts the Notice of Public Meeting #2.
August 11, 2022	Email	N/A	Elected Officials	Ryan Williams; Hon. Todd Smith; Mayor Steve Ferguson; Joy McLeod; Councillor Kate MacNaughton; Councillor Phil St-Jean; Councillor Brad Nieman; Councillor Phil Prinzen; Councillor Bill Roberts	MP – Bay of Quinte; MPP – Bay of Quinte; Prince Edward County Elected Officials	Nadia Dabagh (WSP Golder)	Notice of Public Meeting #2	N. Dabagh (WSP Golder, on behalf of Lehigh) emailed elected officials the Notice of Public Meeting #2.
August 11, 2022	Email	N/A	Provincial Government Agency	Shealyn Mailey	Ministry of the Environment, Conservation and Parks	Nadia Dabagh (WSP Golder)	Project contact list	S. Mailey emailed N. Dabagh noting that the new contact is Sharilyn Kennedy and provided their email address. N. Dabagh responded noting that the Project contact list had been updated.

Communication Date	Communication Method	Communication Location	Stakeholder Group	Individual Stakeholder Contact(s)	Stakeholder Position	Team Members Involved	Category	Summary of Communication
August 11, 2022	Email	N/A	Provincial Government Agency	Header Merza	Ministry of the Environment, Conservation and Parks	Nadia Dabagh (WSP Golder)	Notice of Public Meeting #2	H. Merza emailed N. Dabagh noting that the Notice of Public Meeting #2 was being forwarded on to MECP's air (Jan Kowalczyk) and noise (Michael Duong) engineers who worked on the current ECA # 0073-BHGQHC (Issue Date: October 31, 2019). This was noted by the Project Team.
August 12, 2022	Email	N/A	Elected Officials	Ryan Williams	MP – Bay of Quinte	Nadia Dabagh (WSP Golder)	Notice of Public Meeting #2	R. Williams emailed N. Dabagh noting that MP Williams would be attending another event at the time of Public Meeting #2 and requested that any notes that arise during the meeting be passed along to him. N. Dabagh responded thanking him for the notification and advising that the Public Meeting #2 presentation would be made available on the Project website following the Public Meeting and that all comments received would be documented in the Consultation Report which would also be made available on the Project website.
August 16, 2022	Email	N/A	Indigenous Community	Francis Chua	Support to Curve Lake First Nation (CLFN)	LehighPictonALCF@golder.com (WSP Golder)	Indigenous Community Engagement	F. Chua emailed the Project Team noting that they were encouraged in particular to hear about working together to build a strong relationship between CLFN and Lehigh Hanson and that their main goal was to obtain the information/documents/plans necessary to understand the project and assist with getting reviews done either by CLFN staff and/or supporting consultants. F. Chua also requested meeting to have an initial discussion. The Project Team suggested meeting on September 1, 2022.
August 21, 2022	Email	N/A	Member of the Public	Member of the Public	Member of the Public	LehighPictonALCF@golder.com (WSP Golder)	Notice of Public Meeting #2	A member of the public emailed the Project Team inquiring about why a Demonstration Project was not being conducted; what are the sources of RDFs are being proposed, how much trucking would be involved in the transportation, and what the carbon footprint would be prior to arrival at the plant; and what scrubbing processes are proposed to eliminate any sulphur and nitrous oxides prior to the emissions entering the environment and if the Picton Plant has scrubbers similar to those that were installed at the St. Mary's plant in Bowmanville. The Project Team responded explaining that the demonstration and non-demonstration pathways require compliance to emissions standards be met and that Public Meeting #2 described how the ALCF emissions were assessed and how stack testing upon utilization of the ALCFs will provide the same level of assurance as a demonstration project would. The Project Team noted that RDF processing in Ontario is still developing and that the supply chain would have to be within close proximity to the facility to make it both economical from a trucking cost perspective and have a lower overall carbon footprint. The Project Team explained that the Picton Plant utilizes a hydrated lime injection system for SO <sub>2</sub> abatement along with a modified quarry plan to reduce sulphur inputs. Additionally, Lehigh utilizes an Aqua Ammonia injection system for Selective Non-Catalytic Reduction (SNCR) of NO <sub>x</sub> . Lehigh and the St. Mary's Bowmanville site would have the same compliance limits irrespective of the methodology for emissions reduction. Public Meeting #2 described the emission assessment with ALCFs and the impact to SO <sub>2</sub> / NO <sub>x</sub> emissions from ALCFs.
August 24, 2022	Email	N/A	Stakeholder	N/A	Prince Edward County Conservancy (County Conservancy)	LehighPictonALCF@golder.com (WSP Golder)	Notice of Public Meeting #2	The Project Team emailed County Conservancy noting that they had not been registered yet and that the Project Team wanted to ensure they were aware of the upcoming Public Meeting #2. The County Conservancy responded indicating that they were unavailable to attend the Public Meeting.

Communication Date	Communication Method	Communication Location	Stakeholder Group	Individual Stakeholder Contact(s)	Stakeholder Position	Team Members Involved	Category	Summary of Communication
August 24, 2022	Email	N/A	Indigenous Community	Francis Chua	Support to Curve Lake First Nation (CLFN)	LehighPictonALCF@golder.com (WSP Golder)	Indigenous Community Engagement	F. Chua emailed the Project Team noting that he would be away and suggested to meet on September 12, 2022. The Project Team responded noting that we were unavailable on September 12, 2022 and suggested to meet on September 14, 2022.
August 25, 2022	Microsoft Teams Webinar	Microsoft Teams	Public	Public	Public	Nektarios (Nick) Papanicolaou, Carsten Schraeder, Jasper van de Wetering, Melissa Eaton, and Ray Nobles (Lehigh); Sean Capstick, Jamie McEvoy, Sarah Asselstine and Nadia Dabagh (WSP Golder)	Public Meeting #2	Public Meeting #2 was held as a virtual information session (webinar) from 6:00 p.m. to 8:00 p.m. The meeting consisted of a presentation given by members of the Project Team and question-and-answer periods scattered throughout the presentation. Thirty-nine (39) individuals registered to attend the virtual information sessions. Twenty-two (22) individuals attended the virtual information session. Twenty-four (24) comments or questions were submitted using the Question and Answer function of the webinar. Additional comments or questions were submitted via the Project Team email during the presentation. These questions are presented in Appendix D.
August 26, 2022	Website	N/A	Public	Public	Public	N/A	Public Meeting #2	The Project Team uploaded the Public Meeting #2 presentation to the Project website.
August 26, 2022	Email	N/A	Public	N/A	Public	Nadia Dabagh (WSP Golder)	Public Meeting #2	The Project Team emailed the attendees of the meeting inviting them to an open-house at the Lehigh Picton Cement Plant on Wednesday, August 31, 2022 to discuss any questions from Public Meeting #2 or the project overall.
August 27, 2022	Email	N/A	Member of the Public	Member of the Public	Member of the Public	Nadia Dabagh (WSP Golder)	Public Meeting #2	A member of the public emailed the Project Team inquired about receiving a PDF of the presentation. N. Dabagh responded indicating that the Project website had a PDF of the presentation.
August 30, 2022	Email	N/A	Member of the Public	Member of the Public	Member of the Public	LehighPictonALCF@golder.com (WSP Golder)	Public Meeting #2	A member of the public emailed the Project Team noting that Highway 49 should be called County Road 49, that the County is now facing over 20 million dollars to reconstruct County Road 49, and that a high volume of all season heavy vehicle traffic is related to the Lehigh operation and that this permit would add more heavy vehicles to County Road 49. In addition, they inquired about the on-site rejected materials referenced on the equipment schematics and process overview, specifically, what Lehigh plans to do with the rejected materials. The member of the public expressed concern that the quantities of rejected materials would overwhelm the County-operated landfills. Additionally, the member of the public expressed concern about the potential technical difficulties experienced at Public Meeting #2 that limited some of the public's ability to use the Microsoft Teams chat / comment feature. The Project Team responded noting that the mailing address for the Picton Lehigh Cement Plant is listed as 1370 Hwy 49. The Project Team explained that while Lehigh's operations contribute to heavy vehicle traffic, the Ontario Aggregate Resources Corporation (TOARC) fees are applied to each metric tonnes (mt) of limestone for the quarry used in the manufacturing of cement. The Lehigh quarry operates north of Hwy 49 and a tunnel passes under Hwy 49 such that no aggregate from the quarry travels via public roadway. 70% of the product from Lehigh's facility is transported via marine transport. The TOARC fees are proportioned to the local municipality and the Crown accordingly to be allocated as needed. TOARC fees are in addition to the property tax and marine transport fees. The Project Team explained that rejected materials would be either metals which would be recycled, or oversized material which would be anticipated to be less than 1% of the delivered material and Lehigh will be investigating returning unacceptable material to the supplier. The Project Team noted that these materials are currently destined for landfill and as



Communication Date	Communication Method	Communication Location	Stakeholder Group	Individual Stakeholder Contact(s)	Stakeholder Position	Team Members Involved	Category	Summary of Communication
								such, with the use of ALCFs a 99% reduction of the total landfilled material would be achieved. Additionally, Lehigh is in communication with Prince Edward County to explore opportunities with the County such that Lehigh assists with landfill diversion by using ALCFs at the Picton Plant. The Project Team explained that some Public Meeting #2 attendees unfortunately had technical difficulties, while others were able to use the chat / comment feature adequately. Those who were unable to use the chat / comment feature during the presentation were encouraged to provide their questions / comments via email to the Project Team. All questions received via email were raised and answered during Public Meeting #2. Lehigh also provided public access to view the Public Meeting #2 presentation live in a boardroom at the Picton Plant for anyone not able to connect virtually. Additionally, following Public Meeting #2, an open house invitation was issued to all attendees of Public Meeting #2 to come to the Picton Plan on August 31, 2022 to ensure all questions / comments could be received and captured, and to address any accessibility requirement of the Public Meeting #2 attendees.
August 31, 2022	In-person	Lehigh Picton Cement Plant	Public	Public	Public	Nektarios (Nick) Papanicolaou, Carsten Schraeder, and Melissa Eaton (Lehigh); Jamie McEvoy (WSP Golder)	Public Meeting #2	Following Public Meeting #2, the Project Team emailed attendees of Public Meeting #2 inviting them to an open-house at the Lehigh Picton Cement Plant on August 31, 2022 to discuss any questions from Public Meeting #2 or the Project overall. No additional questions were received.
September 1, 2022	Email	N/A	Member of the Public	Member of the Public	Member of the Public	LehighPictonALCF@golder.com (WSP Golder)	Public Meeting #2	<p>A member of the public emailed the Project Team noting that both public meetings were informative and professionally run and apologizing for missing the open-house on August 31, 2022. The member of the public mentioned that the technical issues experienced during Public Meeting #2 was likely due to participants opening the Microsoft Teams Webinar in a web browser which did not give them access to the Q&amp;A or chat function. The member of the public inquired about the proposed ALCFs noted in Public Meeting #2, specifically whether there are any generally recognized standards for what ALCFs may contain or if this is decided by the fuel producers and asked for more specifics regarding what type of testing is being proposed for each ALCF prior to unloading at the plant. The Project Team thanked the member of the public for their detailed questions and comment on the project and explained that O. Reg. 79/15 is explicit in what fuels are not acceptable and the criteria that must be met for a fuel to be considered acceptable. Additionally, any trace contaminants that may be presents in the fuels must be assessed in the Emissions Summary and Dispersion Modelling (ESDM) Report, which must show compliance with the MECP air limits at offsite locations for the emission from the Plant. The MECP air limits are protective of human health and the environment. The Project Team also noted that Lehigh has developed a fuel handling and receiving protocol that includes:</p> <ul style="list-style-type: none"><li>background (including a site description and proposed storage and handling equipment), handling procedures for ALCFs (including incoming and outgoing records), material acceptance and vendor screening process, and ALCF sampling and testing, and next steps taken upon identification of deficiencies.</li><li>background (including a site description and proposed storage and handling equipment);</li></ul>

Communication Date	Communication Method	Communication Location	Stakeholder Group	Individual Stakeholder Contact(s)	Stakeholder Position	Team Members Involved	Category	Summary of Communication
								<ul style="list-style-type: none"><li>▪ handling procedures for ALCFs (including incoming and outgoing records);</li><li>▪ material acceptance and vendor screening process; and</li><li>▪ ALCF sampling and testing, and next steps taken upon identification of deficiencies.</li></ul> <p>The Project Team also noted that sampling and testing will be completed to ensure the material assessed is included in the ESDM Report and satisfies O. Reg. 79/15 and plant operating parameters (i.e., environmental, operational, and carbon testing).</p>
September 7, 2022	Email	N/A	Member of the Public	Member of the Public	Member of the Public	Nadia Dabagh (WSP Golder)	Public Meeting #2	<p>A member of the public emailed the Project Team inquiring if the Public Meeting #2 webinar was recorded and if they could get a copy. The Project Team responded noting that the Public Meeting #2 presentation materials were uploaded to the Project website and provided a link. Additionally, the Project Team noted that the technical reports and consultation report would be uploaded to the Project website in the coming weeks.</p>
September 12, 2022	Email	N/A	Member of the Public	Member of the Public	Member of the Public	Jamie McEvoy (WSP Golder) & LehighPictonALCF@golder.com (WSP Golder)	Public Meeting #2	<p>A member of the public emailed the Project Team noting that the Project website was taken down. They also inquired whether the emissions from the diesel trucks were included in the calculations for GHG emissions, particularly for ALCFs being transported from far away (e.g. Buffalo, New York), and how Lehigh plans to address obtaining materials from different facilities that may have varying standards of quality. They also inquired about what exactly the proposed ALCFs would contain and noted that there are still fugitive emissions from the plant. The member of the public noted that the Project Team has said that materials from demolition would be a large part of the ALCFs used and inquired what assurances the Project Team would be able to give the public that there are no asbestos or harmful carcinogens in the ALCFs used at the plant. The member of the public noted that they were skeptical of the “green” proposal and greenwashing being a popular corporate strategy for decreasing costs and increasing profits. The Project Team responded noting that the Project website was indeed active and that the Public Meeting #2 presentation materials were available on the Project website. The Project Team provided links to the website as well. The Project Team noted that they would provided responses to their questions in a separate email. The Project Team followed up with the member of the public to answer their remaining questions. The Project Team explained that ideally the fuel suppliers and locations would be as close to the plant as possible to minimize transportation GHGs and costs. The Project Team explained that the purpose of O. Reg. 79/15 is to reduce the use of coal and petcoke by using lower carbon intensive fuels and that a full upstream and downstream GHG assessment is outside of the scope of this Project. The Project Team noted that assuming the transportation of fuels is a net addition of carbon emissions does not consider the fuel lifecycle of coal and the proposed ALCFs, such that:</p> <ul style="list-style-type: none"><li>▪ The main source of fuel is shipped via boat and there are significant GHGs from the extraction and shipping of this high carbon fuel; and</li><li>▪ The material that Lehigh is proposing to use would end up in a landfill where a significant portion (~50%) of the carbon that is in the materials would be released as methane versus carbon dioxide if it was not combusted as a fuel in a cement kiln. Methane is 25 times worse of a GHG than carbon dioxide on a mass basis.</li></ul>



Communication Date	Communication Method	Communication Location	Stakeholder Group	Individual Stakeholder Contact(s)	Stakeholder Position	Team Members Involved	Category	Summary of Communication
								The Project Team noted that this is just one step of several that Lehigh is proposing to do the reduce their carbon footprint and emissions. The Project Team also explained that fugitive emissions from the current facility are managed through the dust best management practice plans (BMPP), which is a living document and is updated as better management practices develop. The Project Team explained that asbestos is a hazardous waste and is disposed of differently than construction and demolition and that this material is not eligible to be disposed of at the material recyclers providing the ALCF material to Lehigh. For monitoring of the trucks, Lehigh has developed a detailed fuel handling and testing procedure, and the unloading of trucks will be visually inspected by an operator in the ALCF receiving and storage building or through a camera in the control room. Finally, the Project Team expressed their understanding of their concerns with greenwashing and noted that O. Reg. 79/15 prescribes the acceptable use of ALCFs in Ontario and this ALCF permit application is consistent with the O. Reg. 79/15 requirements whereby a reduction in GHG emissions from the Plant will be achieved with less reliance on fossil fuels (i.e., petcoke and coal). The Project Team noted that this is an excellent first step for the cement industry in Ontario to reduce its GHGs and represents one strategy in aiming for net zero emissions.
September 12, 2022	Email	N/A	Stakeholder	N/A	Prince Edward County Field Naturalists (PECFN)	LehighPictonALCF@golder.com (WSP Golder)	Public Meeting #2	The PECFN emailed the Project Team noting that they experience technical difficulties during Public Meeting #2 and was unable to ask questions via the virtual webinar and inquired who would be the best person on the Project Team to ask their questions. The Project Team responded noting that they can submit their questions via email to N. Dabagh or N. Papanicolaou.
September 14, 2022	Microsoft Teams	Virtual Meeting	Indigenous Community	Francis Chua	Support to Curve Lake First Nation (CLFN)	LehighPictonALCF@golder.com (WSP Golder)	Indigenous Community Engagement	The Project Team had an introductory call with F. Chua, support to CLFN. The Project Team presented an overview of the project and process timeline and F. Chua was provided the opportunity to ask questions about the project.
September 14, 2022	Email	N/A	Indigenous Community	Francis Chua	Support to Curve Lake First Nation (CLFN)	LehighPictonALCF@golder.com (WSP Golder)	Indigenous Community Engagement	F. Chua emailed the Project Team noting that CLFN would like to schedule in a small scale review of the documents that will be available once the Notice of Completion of Consultation Report. F. Chua also provided a capacity agreement template and noted that we could use this first interaction as a way to develop an ongoing relationship with both Lehigh and WSP. The Project Team responded via email noting that Lehigh looks forward to developing a meaningful long-term relationship with CLFN and suggested that the best path forward to developing this long-term relationship is to create a dialogue with CLFN in the form of a meeting in order to provide more details about the project, address areas of interest or concern about the project, and assist in developing CLFN's understanding of the project and their environmental concerns, including the air emissions from the project. Discussions with CLFN are ongoing.
September 26, 2022	Email	N/A	Agency	Karla Barboza	Ministry of Citizenship and Multiculturalism (MCM) (formerly known as the Ministry of Tourism, Culture, Sport (MTCS))	Nektarios (Nick) Papanicolaou (Lehigh)	Notice of Intent to Apply and Notice of Public Meeting #1	K. Barboza emailed the Project Team in response to the emails sent to MCM on June 10, July 15, and August 16, 2022. K. Barboza noted the following recommendations: <ul style="list-style-type: none"><li>Archaeological resources: complete the <i>Criteria for Evaluating Archaeological Potential</i> screening checklist documenting that the project area has been subject to recent extensive and intensive ground disturbance. If the undertaking impacts water, complete the</li></ul>

Communication Date	Communication Method	Communication Location	Stakeholder Group	Individual Stakeholder Contact(s)	Stakeholder Position	Team Members Involved	Category	Summary of Communication
								<p><i>Criteria for Evaluating Marine Archaeological Potential</i> to determine whether a marine archaeological assessment is required.</p> <ul style="list-style-type: none"><li>▪ Built heritage resources and cultural heritage landscapes: complete the <i>Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes</i> screening checklist. Check with the municipality (municipal heritage planner) if the property may have cultural heritage value.</li></ul> <p>The Project Team completed the checklists for evaluating potential for built heritage resources, cultural heritage landscapes and archaeological resources and provided these checklists to K. Barboza via email. The Project Team noted that while the study area is within an area of archaeological potential due to its proximity to water and known archaeological sites, the extensive and widespread disturbance within the cement plant has removed archaeological potential for the footprint of the building etc. for the ALCF project. The Project Team noted that the Lehigh Picton Cement Plant has buildings on the property that are older than 40 years old, and therefore the screening form indicates that the facility may have the potential for cultural heritage. However, the form also indicates that buildings that are 40+ years do not necessarily hold cultural value or interest. The Project Team noted that this is a heavy industrial site and the buildings experience significant impacts from the operations. As part of this project, Lehigh is making some minimal modifications to existing buildings (no removal and simply alterations to allow for conveyance of ACLFs) to allow for the use of alternative low carbon fuels (ALCFs) in the cement kiln and reduce their emissions of greenhouse gases. The ALCF project will be limited to a small pre-disturbed area with a new building constructed with covered conveyors connecting to the existing kiln buildings.</p>
November 23, 2022	Website	N/A	Public	Public	Public	N/A	Notice of Completion of Consultation Report	The Project Team uploaded the Notice of Completion of Consultation Report and the Consultation Report to the Project website.
November 24, 2022	Canada Post Neighbourhood Mail <sup>TM</sup> (unaddressed mail)	N/A	Public	Public	Public	N/A	Notice of Completion of Consultation Report	The Notice of Completion of Consultation Report was delivered to approximately 5,994 property owners in Picton, Ontario.
November 24, 2022	Newspaper	N/A	Public	Public	Public	N/A	Notice of Completion of Consultation Report	The Notice of Completion of Consultation Report was published in the <i>Picton Gazette</i> newspaper. Note: The Notice of Completion of Consultation Report will be published in the <i>Picton County Weekly News</i> and <i>Picton Gazette</i> newspapers on December 1, 2022.
November 24, 2022	Email	N/A	Public	Public	Public	N/A	Notice of Completion of Consultation Report	N. Dabagh (WSP Golder, on behalf of Lehigh) emailed Public contacts the Notice of Completion of Consultation Report.
November 24, 2022	Email	N/A	Indigenous Communities	Chief Dave Mowat; Dave Simpson; Chief Emily Whetung-MacInnes; Julie Kapyrka; Kaitlin Hill; Chief Laurie Carr; Tom Cowie; Sean Davidson;	Alderville First Nation; Curve Lake First Nation; Hiawatha First Nation; Mississaugas of Scugog Island First Nation;	Nadia Dabagh (WSP Golder)	Notice of Completion of Consultation Report	N. Dabagh (WSP Golder, on behalf of Lehigh) emailed Indigenous community contacts the Notice of Completion of Consultation Report.

Communication Date	Communication Method	Communication Location	Stakeholder Group	Individual Stakeholder Contact(s)	Stakeholder Position	Team Members Involved	Category	Summary of Communication
				Chief Kelly LaRocca; Waverly Birch; Chief R. Donald Maracle; Charlotte Gurnsey; Chief Kris Nahrgang; Karry Sandy-McKenzie	Mohawks of the Bay of Quinte First Nation; Kawartha Nishnawbe; William Treaties First Nations			
November 24, 2022	Email	N/A	Federal Government Agencies	Fisheries Protection Program; Jennifer Hughes; Cynthia Brown	Fisheries and Oceans Canada; Indigenous and Northern Affairs Canada	Nadia Dabagh (WSP Golder)	Notice of Completion of Consultation Report	N. Dabagh (WSP Golder, on behalf of Lehigh) emailed federal government agency contacts the Notice of Completion of Consultation Report.
November 24, 2022	Email	N/A	Provincial Government Agencies	Shareen Han; Header Merza; Denton Miller; Shushant Agarwal; Alex Baldassi; Shealyn Mailey; Jeffrey McKerral; Trevor Dagilis; Cathy Chisholm; Melanie Needham; Neryed Ragbar; Hon. Todd Smith; Krystyn Ordyniec; Dan Ethier; Hal Leadlay; Deanna Cotter; Catherine Warren; Katie O'Connell; Andrew Ogilvie; Darlene Dove; Jennifer Graham Harkness; James Hamilton; Jack Mallon; Hon. Sylvia Jones; Samantha Gomez; Office of the Auditor General of Ontario; Brad McNevin; Paul McCoy	Ministry of the Environment, Conservation and Parks; Ministry of Energy; Ministry of Indigenous Affairs; Ministry of Municipal Affairs and Housing; Ministry of Northern Development, Mines, Natural Resources and Forestry; Ministry of Transportation; Ministry of Citizenship and Multiculturalism (formerly Ministry of Tourism, Culture and Sport); Ministry of the Solicitor General; Ministry of Labour, Training and Skills Development; Office of the Auditor General; Quinte Conservation Authority	Nadia Dabagh (WSP Golder)	Notice of Completion of Consultation Report	N. Dabagh (WSP Golder, on behalf of Lehigh) emailed provincial government agency contacts the Notice of Completion of Consultation Report.
November 24, 2022	Email	N/A	Municipal Government	Catalina Blumenberg; Anne Kantharajah; Marcia Wallace; Theresa Collins-Ruban; Peter Moyer; Andy Harrison; Jeff Bryans; Albert Paschkowiak; Michael Michaud; Mark Kerr	Prince Edward County	Nadia Dabagh (WSP Golder)	Notice of Completion of Consultation Report	N. Dabagh (WSP Golder, on behalf of Lehigh) emailed municipal government contacts the Notice of Completion of Consultation Report.
November 24, 2022	Email	N/A	Elected Officials	Ryan Williams; Hon. Todd Smith; Mayor Steve Ferguson; Joy McLeod; Councillor Kate MacNaughton; Councillor Phil St-Jean; Councillor Brad Nieman; Councillor Phil Prinzen; Councillor Bill Roberts	MP – Bay of Quinte; MPP – Bay of Quinte; Prince Edward County Elected Officials	Nadia Dabagh (WSP Golder)	Notice of Completion of Consultation Report	N. Dabagh (WSP Golder, on behalf of Lehigh) emailed elected officials the Notice of Completion of Consultation Report.

**APPENDIX F**

**Copies of Written Comments  
Received**

*[Please note that personal  
information of public stakeholders  
has been removed for protection of  
privacy]*

## Dabagh, Nadia

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**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** March 18, 2022 11:46 AM  
**To:** Dabagh, Nadia  
**Cc:** 21480803, Lehigh Low Carbon Fuels ECA Ontario  
**Subject:** FW: Your email has been received

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

NOTE: This email chain appears to contain email from outside Golder

-----Original Message-----

From: Comments <comments@auditor.on.ca>  
Sent: March 17, 2022 7:26 AM  
To: LehighPictonALCF <LehighPictonALCF@golder.com>  
Subject: Your email has been received

EXTERNAL EMAIL

Thank you for writing to the Office of the Auditor General of Ontario.

This is to acknowledge receipt of your e-mail. We carefully consider all information at our disposal in selecting and planning our value-for-money audits, including any information that has been sent to us by the public. Please be assured that we will provide your email to the relevant Audit Director for his or her review.

If any follow-up is required to answer your query or if we require any additional information from you, the relevant Audit Director will contact you.

For information about our Office, our mandate and our upcoming reports, as well as for copies of our past reports, please visit our website at

<https://can01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.auditor.on.ca%2F&data=04%7C01%7CLehighPictonALCF%40golder.com%7Ce415014e9058424fef5508da0808fa8c%7C46b66e8634824192842f3472ff5fe764%7C1%7C1%7C637831131900873489%7CUnknown%7CTWFpbGZsb3d8eyJWlloiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikl1haWwiLCJXVCi6Mn0%3D%7C2000&sd=0&data=gXCKn7uhTcX2sJqViRtaHq8NwYtbjOb0z0bWPUyjNCK%3D&reserved=0>.

Sincerely,

Office of the Auditor General of Ontario

-- This email (including attachments) may contain confidential, personal, legally-privileged, copyrighted information, or information exempt from disclosure under The Auditor General Act, R.S.O. 1990, c. A.35. Contact me immediately if you

are not the intended recipient and delete this email from your system and do not use, distribute (forward), copy, or disclose its contents.



## Dabagh, Nadia

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**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** March 18, 2022 11:46 AM  
**To:** Dabagh, Nadia  
**Cc:** 21480803, Lehigh Low Carbon Fuels ECA Ontario  
**Subject:** FW: FFHPP.CA Auto-Reply

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

NOTE: This email chain appears to contain email from outside Golder

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**From:** FPP.CA / PPP.CA (DFO/MPO) <fisheriesprotection@dfo-mpo.gc.ca>  
**Sent:** March 17, 2022 7:26 AM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Subject:** FFHPP.CA Auto-Reply

### EXTERNAL EMAIL

Thank you for contacting Fisheries and Oceans Canada, Fish and Fish Habitat Protection Program.

This e-mail is a confirmation of receipt for your submission of a Request for Review form or Code of Practice notification form. Please do not mail a hard copy of your submission to any of our offices at this time unless you are unable to submit a digital version.

Please note that we are currently receiving a higher than normal volume of submissions and inquiries and continue to operate under alternate work arrangements.

We will respond to your email as soon as possible. Thank you for your patience.

Merci d'avoir pris contact avec le Programme de protection du poisson et de son habitat de Pêches et Océans Canada.

Le présent courriel accuse réception du formulaire de demande d'examen ou d'avis de code de pratique que vous avez envoyé. Veuillez ne pas envoyer de copie papier à nos bureaux pour le moment à moins que vous soyez dans l'incapacité d'envoyer une version numérique.

Veuillez noter que nous recevons actuellement un volume d'envois et de demandes supérieur à la normale et que nous continuons à travailler selon des modalités adaptées.

Nous répondrons à votre courriel dès que possible. Nous vous remercions pour votre patience.

## Dabagh, Nadia

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**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** March 18, 2022 11:45 AM  
**To:** Dabagh, Nadia  
**Cc:** 21480803, Lehigh Low Carbon Fuels ECA Ontario  
**Subject:** FW: Lehigh Picton Cement Plant Notice of Intent to Apply (O. Reg. 79/15) & Invitation to Public Meeting  
**Attachments:** Lehigh Notice of Intent to Apply.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

NOTE: This email chain appears to contain email from outside Golder

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**From:** ONT Environment / Environnement ONT <EnviroOnt@tc.gc.ca>  
**Sent:** March 17, 2022 9:48 AM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Subject:** RE: Lehigh Picton Cement Plant Notice of Intent to Apply (O. Reg. 79/15) & Invitation to Public Meeting

### EXTERNAL EMAIL

Greetings,

Thank you for your correspondence.

Please note Transport Canada **does not** require receipt of all individual or Class EA related notifications. We are requesting project proponents self-assess if their project:

1. Will interact with a federal property and/or waterway by reviewing the Directory of Federal Real Property, available at [www.tbs-sct.gc.ca/dfrp-rbif/](http://www.tbs-sct.gc.ca/dfrp-rbif/); and
2. Will require approval and/or authorization under any Acts administered by Transport Canada\* available at <http://www.tc.gc.ca/eng/acts-regulations/menu.htm>.

Projects that will occur on federal property prior to exercising a power, performing a function or duty in relation to that project, will be subject to a determination of the likelihood of significant adverse environmental effects, per Section 82 of the *Impact Assessment Act, 2019*.

If the aforementioned does not apply, the Environmental Assessment program should not be included in any further correspondence and future notifications will not receive a response. If there is a role under the program, correspondence should be forwarded *electronically* to: [EnviroOnt@tc.gc.ca](mailto:EnviroOnt@tc.gc.ca) with a **brief description of Transport Canada's expected role**.

\*Below is a summary of the most common Acts that have applied to projects in an Environmental Assessment context:

- **Canadian Navigable Waters Act (CNWA)** – the Act applies primarily to works constructed or placed in, on, over, under, through, or across navigable waters set out under the Act. The Navigation Protection Program

administers the CNWA through the review and authorization of works affecting navigable waters. Information about the Program, CNWA and approval process is available at: <http://www.tc.gc.ca/eng/programs-621.html>. Enquiries can be directed to [NPPONT-PPNONT@tc.gc.ca](mailto:NPPONT-PPNONT@tc.gc.ca) or by calling (519) 383-1863.

- **Railway Safety Act (RSA)** – the Act provides the regulatory framework for railway safety, security, and some of the environmental impacts of railway operations in Canada. The Rail Safety Program develops and enforces regulations, rules, standards and procedures governing safe railway operations. Additional information about the Program is available at: <https://www.tc.gc.ca/eng/railsafety/menu.htm>. Enquiries can be directed to [RailSafety@tc.gc.ca](mailto:RailSafety@tc.gc.ca) or by calling (613) 998-2985.
- **Transportation of Dangerous Goods Act (TDGA)** – the transportation of dangerous goods by air, marine, rail and road is regulated under the TDGA. Transport Canada, based on risks, develops safety standards and regulations, provides oversight and gives expert advice on dangerous goods to promote public safety. Additional information about the transportation of dangerous goods is available at: <https://www.tc.gc.ca/eng/tdg/safety-menu.htm>. Enquiries can be directed to [TDG-TMDOntario@tc.gc.ca](mailto:TDG-TMDOntario@tc.gc.ca) or by calling (416) 973-1868.
- **Aeronautics Act** – Transport Canada has sole jurisdiction over aeronautics, which includes aerodromes and all related buildings or services used for aviation purposes. Aviation safety in Canada is regulated under this Act and the Canadian Aviation Regulations (CARs). Elevated Structures, such as wind turbines and communication towers, would be examples of projects that must be assessed for lighting and marking requirements in accordance with the CARs. Transport Canada also has an interest in projects that have the potential to cause interference between wildlife and aviation activities. One example would be waste facilities, which may attract birds into commercial and recreational flight paths. The *Land Use In The Vicinity of Aerodromes* publication recommends guidelines for and uses in the vicinity of aerodromes, available at: <https://www.tc.gc.ca/eng/civilaviation/publications/tp1247-menu-1418.htm>. Enquires can be directed to [tc.aviationservicesont-servicesaviationont.tc@tc.gc.ca](mailto:tc.aviationservicesont-servicesaviationont.tc@tc.gc.ca) or by calling 1 (800) 305-2059 / (416) 952-0230.

Please advise if additional information is needed.

Thank you,

**Environmental Assessment Program**, Ontario Region

Transport Canada / Government of Canada / 4900 Yonge St., Toronto, ON M2N 6A5

[EnviroOnt@tc.gc.ca](mailto:EnviroOnt@tc.gc.ca) / Facsimile : (416) 952-0514 / TTY: 1-888-675-6863

**Programme d'évaluation environnementale**, Région de l'Ontario

Transports Canada / Gouvernement du Canada / 4900, rue Yonge, Toronto, ON, M2N 6A5

[EnviroOnt@tc.gc.ca](mailto:EnviroOnt@tc.gc.ca) / télécopieur: (416) 952-0514

---

**From:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>

**Sent:** Thursday, March 17, 2022 7:26 AM

**To:** ONT Environment / Environnement ONT <[EnviroOnt@tc.gc.ca](mailto:EnviroOnt@tc.gc.ca)>; Hughes, Jennifer <[jennifer.hughes@tc.gc.ca](mailto:jennifer.hughes@tc.gc.ca)>

**Subject:** Lehigh Picton Cement Plant Notice of Intent to Apply (O. Reg. 79/15) & Invitation to Public Meeting

Hello,

Lehigh Hanson Materials Ltd. (Lehigh), a part of Heidelberg Cement, is undertaking efforts to use Alternative Low Carbon Fuels (ALCFs) to supplement the energy required to make Portland Cement at their Picton Cement Plant (the Site). ALCFs are in use in many cement plants all over the world and represent a state-of-the-art technology to reduce

greenhouse gas emissions. The use of ALCFs is a key component of Heidelberg Cement's global carbon reduction strategy and diverts non-recyclable materials from landfills. The Site is located at 1370 Hwy 49, Picton, Ontario.

Please see the attached Notice of Intention to Apply under Ontario Regulation 79/15 for Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant.

In support of this application, and in accordance with O. Reg. 79/15 and Lehigh's current ECA approval, Lehigh has scheduled the first of two public meetings.

Public Meeting #1 will be held as a virtual information session, consisting of a presentation given by members of the Project team and a question-and-answer period.

The virtual information session (webinar) will be held on Thursday April 7, 2022 at 6:00 p.m. to 8:00 p.m.

To participate in the virtual event, which will be held using GoToWebinar, please register using the following link:

<https://attendee.gotowebinar.com/register/5859890522647676944>

After registering, you will receive a confirmation email containing information about joining the webinar. **Please note that pre-registration is required.**

If you have any questions, or would like additional information, please feel free to contact the Project team at [LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)

Kind regards,



**Jamie McEvoy**  
*Senior Air Quality Engineer, Project Manager*

On behalf of:



**Nick Papanicolaou**  
Environmental Manager  
Cell: (613) 438-0361

## Dabagh, Nadia

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**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** April 7, 2022 6:14 PM  
**To:** Dabagh, Nadia  
**Subject:** FW: Lehigh Picton Cement Plant Notice of Intent to Apply (O. Reg. 79/15) & Invitation to Public Meeting

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

NOTE: This email chain appears to contain email from outside Golder

Another one that I missed

Jamie McEvoy, PEng  
Senior Air Quality Engineer

T: +1 613 592 9600  
D: +1 613 592 9600 x3254  
C: 613-406-9485

-----Original Message-----

From: Emily Whetung <EmilyW@curvelake.ca>  
Sent: March 17, 2022 6:43 AM  
To: LehighPictonALCF <LehighPictonALCF@golder.com>  
Subject: Automatic reply: Lehigh Picton Cement Plant Notice of Intent to Apply (O. Reg. 79/15) & Invitation to Public Meeting

EXTERNAL EMAIL

Please be advised that I will be away from the office March 11 through to March 25, 2022 to spend time with my family and will only be checking my email occasionally. I will respond to you on my return, but it may take some time to sort through 2 weeks of correspondence.

If you require further assistance please contact Deputy Chief Jeffrey Jacobs @ JeffJ@curvelake.ca our Chief Operating Officer Katie Young- Haddlesey @ KatieYH@curvelake.ca

## Dabagh, Nadia

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**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** April 7, 2022 6:14 PM  
**To:** Dabagh, Nadia  
**Subject:** FW: Lehigh Picton Cement Plant Notice of Intent to Apply (O. Reg. 79/15) & Invitation to Public Meeting

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

NOTE: This email chain appears to contain email from outside Golder

Junk mail that I missed

Jamie McEvoy, PEng  
Senior Air Quality Engineer

T: +1 613 592 9600  
D: +1 613 592 9600 x3254  
C: 613-406-9485

-----Original Message-----

From: Julie Kapyrka <JulieK@curvelake.ca>  
Sent: March 17, 2022 6:43 AM  
To: LehighPictonALCF <LehighPictonALCF@golder.com>  
Subject: Automatic reply: Lehigh Picton Cement Plant Notice of Intent to Apply (O. Reg. 79/15) & Invitation to Public Meeting

EXTERNAL EMAIL

Aaniin,

Thank you for your email. I am currently out of the office.

For consultation matters please contact Kaitlin Hill at: KaitlinH@curvelake.ca

For archaeological matters please contact Jordon MacArthur at: JordonM@curvelake.ca

Miigwech!





## Dabagh, Nadia

---

**From:** Pariag, Jeremiah  
**Sent:** March 21, 2022 11:01 AM  
**To:** Dabagh, Nadia  
**Cc:** 21480803, Lehigh Low Carbon Fuels ECA Ontario; McEvoy, Jamie; LehighPictonALCF  
**Subject:** Re: Lehigh Picton Cement Plant Notice of Intent to Apply (O. Reg. 79/15) & Invitation to Public Meeting

Hi Nadia,

Sure, I can put something together as soon as possible.

These meetings are fairly standard – we’ve met and/or consulted with MSIFN and Waverly Birch on several ongoing projects, and they’ve tended to ask pretty fair questions. I would assume they’re just looking for a quick 15-20 minute overview of the project, followed by some time for Q&A. I would recommend an hour-long meeting to be on the safe side.

Best regards,

Jeremiah

**Jeremiah Pariag M.E.S., IAP2**

Consultation and Engagement Lead (Earth & Environment)



T +1 (289) 835-2548

610 Chartwell Road, Suite 300  
Oakville, Ontario  
L6J 4A5 Canada  
wsp.com  
Pronouns: he, him, his

---

**From:** Dabagh, Nadia <Nadia.Dabagh@wsp.com>  
**Sent:** Friday, March 18, 2022 10:10:12 AM  
**To:** Pariag, Jeremiah <Jeremiah.Pariag@wsp.com>  
**Cc:** 21480803, Lehigh Low Carbon Fuels ECA Ontario <150044@golder.com>; McEvoy, Jamie <Jamie\_McEvoy@golder.com>; LehighPictonALCF <LehighPictonALCF@golder.com>  
**Subject:** RE: Lehigh Picton Cement Plant Notice of Intent to Apply (O. Reg. 79/15) & Invitation to Public Meeting

Hi Jeremiah,

We got a request for a meeting with the Mississaugas of Scugog Island First Nation. Can you draft a response email and provide some insight on the approach?

Thanks,  
Nadia

**Nadia Dabagh**, *she / her*  
Environmental Planner  
Earth & Environment

T+ 1 289-835-2519



---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** March 18, 2022 11:06 AM  
**To:** Dabagh, Nadia <Nadia.Dabagh@wsp.com>  
**Cc:** 21480803, Lehigh Low Carbon Fuels ECA Ontario <150044@golder.com>; McEvoy, Jamie <Jamie\_McEvoy@golder.com>  
**Subject:** FW: Lehigh Picton Cement Plant Notice of Intent to Apply (O. Reg. 79/15) & Invitation to Public Meeting

**NOTE:** This email chain appears to contain email from outside Golder

Hi Nadia,

We have a request to provide a separate meeting. See below.

Can you put this on your list?

Thanks,  
Jamie

---

**From:** Consultation <[consultation@scugogfirstnation.com](mailto:consultation@scugogfirstnation.com)>  
**Sent:** March 17, 2022 1:20 PM  
**To:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Cc:** Consultation <[consultation@scugogfirstnation.com](mailto:consultation@scugogfirstnation.com)>; Samantha Shrubsole <[sam@ibabraising.com](mailto:sam@ibabraising.com)>; Monica Sanford <[msanford@scugogfirstnation.com](mailto:msanford@scugogfirstnation.com)>; Kelly LaRocca <[klarocca@scugogfirstnation.com](mailto:klarocca@scugogfirstnation.com)>  
**Subject:** RE: Lehigh Picton Cement Plant Notice of Intent to Apply (O. Reg. 79/15) & Invitation to Public Meeting

## EXTERNAL EMAIL

Aaniin Jamie,

Thank you for providing this information. We are interested in learning more about your project. Can you please provide a few times when your team is available for a 30 minute introductory call?

Kindly,  
Waverley

--

Waverley Birch (she/her)  
MES, RPP, MCIP  
Consultation Advisor to MSIFN

---

**From:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>

**Sent:** Thursday, March 17, 2022 6:40 AM

**To:** [klarocca@scugogfirstnation.com](mailto:klarocca@scugogfirstnation.com)

**Cc:** Waverley Birch <[wbirch@ibabraising.com](mailto:wbirch@ibabraising.com)>; [Consultation@scugogfirstnation.com](mailto:Consultation@scugogfirstnation.com); [k.a.sandy-mckenzie@rogers.com](mailto:k.a.sandy-mckenzie@rogers.com)

**Subject:** Lehigh Picton Cement Plant Notice of Intent to Apply (O. Reg. 79/15) & Invitation to Public Meeting

Hello Chief Kelly LaRocca,

Lehigh Hanson Materials Ltd. (Lehigh), a part of Heidelberg Cement, is undertaking efforts to use Alternative Low Carbon Fuels (ALCFs) to supplement the energy required to make Portland Cement at their Picton Cement Plant (the Site). ALCFs are in use in many cement plants all over the world and represent a state-of-the-art technology to reduce greenhouse gas emissions. The use of ALCFs is a key component of Heidelberg Cement's global carbon reduction strategy and diverts non-recyclable materials from landfills. The Site is located at 1370 Hwy 49, Picton, Ontario.

Please see the attached Notice of Intention to Apply under Ontario Regulation 79/15 for Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant.

Lehigh considers engagement with Indigenous communities a critical component of the Project planning and development of environmental studies. Lehigh would be pleased to arrange a meeting to gather your input and discuss the project details, if desired. Lehigh would like to also invite representatives from Mississaugas of Scugog Island to attend the first of two public meetings that are being held for this project.

Public Meeting #1 will be held as a virtual information session, consisting of a presentation given by members of the Project team and a question-and-answer period.

The virtual information session (webinar) will be held on Thursday April 7, 2022 at 6:00 p.m. to 8:00 p.m.

To participate in the virtual event, which will be held using GoToWebinar, please register using the following link:

<https://attendee.gotowebinar.com/register/5859890522647676944>

After registering, you will receive a confirmation email containing information about joining the webinar. **Please note that pre-registration is required.**

Lehigh has retained WSP Golder to assist with this Project. If you have any questions, or would like additional information, please feel free to contact the Project team at [LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com). You may also contact Lehigh directly by phone at 613-438-0361 or by email at [Nektarios.Papanicolaou@lehighhanson.com](mailto:Nektarios.Papanicolaou@lehighhanson.com) if you have any questions or comments, or if you would like to discuss this project further in a different setting.

Kind regards,



**Jamie McEvoy**  
*Senior Air Quality Engineer, Project Manager*

On behalf of:



**Nick Papanicolaou**  
Environmental Manager  
Cell: (613) 438-0361

## Dabagh, Nadia

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**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** March 18, 2022 11:46 AM  
**To:** Dabagh, Nadia  
**Cc:** 21480803, Lehigh Low Carbon Fuels ECA Ontario  
**Subject:** FW: Lehigh Picton Cement Plant Notice of Intent to Apply (O. Reg. 79/15) & Invitation to Public Meeting

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

NOTE: This email chain appears to contain email from outside Golder

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**From:** Charlotte Gurnsey <consultation@mbq-tmt.org>  
**Sent:** March 17, 2022 6:38 AM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Subject:** Automatic reply: Lehigh Picton Cement Plant Notice of Intent to Apply (O. Reg. 79/15) & Invitation to Public Meeting

### EXTERNAL EMAIL

She:kon,

Please advise that I will be away from the office for the time being.

For immediate inquiries, please contact Lisa Maracle at [lisam@mbq-tmt.org](mailto:lisam@mbq-tmt.org).

Nia:wen,  
Charlotte Gurnsey

## Dabagh, Nadia

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**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** March 18, 2022 11:12 AM  
**To:** Dabagh, Nadia  
**Cc:** 21480803, Lehigh Low Carbon Fuels ECA Ontario  
**Subject:** FW:

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

[NOTE: This email chain appears to contain email from outside Golder](#)

Another request – not sure how to deal with this one.

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**From:** [REDACTED] >  
**Sent:** March 17, 2022 10:32 PM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Subject:**

### EXTERNAL EMAIL

Please add my name to the list for further information on this project .

[REDACTED]

[REDACTED]

Thank you

[REDACTED]



## Dabagh, Nadia

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**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** March 18, 2022 11:44 AM  
**To:** Dabagh, Nadia  
**Cc:** 21480803, Lehigh Low Carbon Fuels ECA Ontario  
**Subject:** FW: Information and Mailing list

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

NOTE: This email chain appears to contain email from outside Golder

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**From:** [REDACTED] >  
**Sent:** March 17, 2022 10:55 AM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Subject:** Information and Mailing list

### EXTERNAL EMAIL

Good morning,

I live nearby, please add me to the contact list for future updates on the project. I would also like to see any prepared information you may have on the project.

Thank you kindly,

[REDACTED]

--

[REDACTED]

## Dabagh, Nadia

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**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** March 18, 2022 11:44 AM  
**To:** Dabagh, Nadia  
**Cc:** 21480803, Lehigh Low Carbon Fuels ECA Ontario  
**Subject:** FW: Lehigh Picton Cement Plant Notice of Intent to Apply (O. Reg. 79/15) & Invitation to Public Meeting

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

NOTE: This email chain appears to contain email from outside Golder

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**From:** Smith-co, Todd <todd.smithco@pc.ola.org>  
**Sent:** March 17, 2022 7:17 AM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Subject:** Automatic reply: Lehigh Picton Cement Plant Notice of Intent to Apply (O. Reg. 79/15) & Invitation to Public Meeting

### EXTERNAL EMAIL

Thank you for contacting the office of Todd Smith, Member of Provincial Parliament for Bay Of Quinte.

MPP Smith welcomes hearing from constituents on issues that are important to them. A reply to your email will be provided as soon as possible.

Due to the high volume of email correspondence, priority response is given to residents of Bay of Quinte and to emails of a non-form letter or "email forward" variation. Likewise, if you are not a constituent, then please contact the Member of Provincial Parliament for your riding. To find your MPP, please visit <http://www.ola.org/en/members/current>

**If you have a Ministry matter and are not a constituent from the Bay of Quinte riding, you can contact the Ministry of Energy at [Todd.Smith@ontario.ca](mailto:Todd.Smith@ontario.ca)**

If you are a constituent of Bay of Quinte who requires a response from our office, and if you:

- have verified this by including your complete residential postal address and a phone number, a response will be provided in a timely manner
- have not included your residential postal mailing address, please resend your email with your complete residential mailing address as well as phone number and a response will be forthcoming.

Also, if you're a constituent with an urgent matter, please call the constituency office at 613-962-1144 for immediate assistance.

Again, thank you for taking the time to share your thoughts and concerns.

#### **Office of Todd Smith, MPP for Bay of Quinte**

5503 Highway 62 S.  
Unit D Box 6-2  
Belleville, ON K8N 4Z7  
P: 613-962-1144 F: 613-969-6381  
E: [todd.smithco@pc.ola.org](mailto:todd.smithco@pc.ola.org)

## Dabagh, Nadia

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**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** March 18, 2022 11:47 AM  
**To:** Dabagh, Nadia  
**Cc:** 21480803, Lehigh Low Carbon Fuels ECA Ontario  
**Subject:** FW: Lehigh Picton Cement Plant Notice of Intent to Apply (O. Reg. 79/15) & Invitation to Public Meeting

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

NOTE: This email chain appears to contain email from outside Golder

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**From:** Catalina Blumenberg <cblumenberg@pecounty.on.ca>  
**Sent:** March 18, 2022 11:03 AM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>; Mayor Steven Ferguson <sferguson@pecounty.on.ca>; Joy McLeod <jmcleod@pecounty.on.ca>; Kate MacNaughton <kmacnaughton@pecounty.on.ca>; Phil St-Jean <pst-jean@pecounty.on.ca>; Brad Nieman <bnieman@pecounty.on.ca>; Phil Prinzen <pprinzen@pecounty.on.ca>; Bill Roberts <broberts@pecounty.on.ca>; Anne Kantharajah <akantharajah@pecounty.on.ca>; Marcia Wallace <mwallace@pecounty.on.ca>; Theresa Collins-Ruban <tcollinsruban@pecounty.on.ca>  
**Subject:** RE: Lehigh Picton Cement Plant Notice of Intent to Apply (O. Reg. 79/15) & Invitation to Public Meeting

### EXTERNAL EMAIL

Thank you, I acknowledge receipt of your notice. This will be shared with all members of Council and our Environmental Advisory Committee.

Best,

Catalina Blumenberg, Clerk

---

**From:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Sent:** March 17, 2022 7:16 AM  
**To:** Mayor Steven Ferguson <[sferguson@pecounty.on.ca](mailto:sferguson@pecounty.on.ca)>; Joy McLeod <[jmcleod@pecounty.on.ca](mailto:jmcleod@pecounty.on.ca)>; Kate MacNaughton <[kmacnaughton@pecounty.on.ca](mailto:kmacnaughton@pecounty.on.ca)>; Phil St-Jean <[pst-jean@pecounty.on.ca](mailto:pst-jean@pecounty.on.ca)>; Brad Nieman <[bnieman@pecounty.on.ca](mailto:bnieman@pecounty.on.ca)>; Phil Prinzen <[pprinzen@pecounty.on.ca](mailto:pprinzen@pecounty.on.ca)>; Bill Roberts <[broberts@pecounty.on.ca](mailto:broberts@pecounty.on.ca)>; Catalina Blumenberg <[cblumenberg@pecounty.on.ca](mailto:cblumenberg@pecounty.on.ca)>; Anne Kantharajah <[akantharajah@pecounty.on.ca](mailto:akantharajah@pecounty.on.ca)>; Marcia Wallace <[mwallace@pecounty.on.ca](mailto:mwallace@pecounty.on.ca)>; Theresa Collins-Ruban <[tcollinsruban@pecounty.on.ca](mailto:tcollinsruban@pecounty.on.ca)>  
**Subject:** Lehigh Picton Cement Plant Notice of Intent to Apply (O. Reg. 79/15) & Invitation to Public Meeting

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

Lehigh Hanson Materials Ltd. (Lehigh), a part of Heidelberg Cement, is undertaking efforts to use Alternative Low Carbon Fuels (ALCFs) to supplement the energy required to make Portland Cement at their Picton Cement Plant (the Site). ALCFs are in use in many cement plants all over the world and represent a state-of-the-art technology to reduce greenhouse gas emissions. The use of ALCFs is a key component of Heidelberg Cement's global carbon reduction strategy and diverts non-recyclable materials from landfills. The Site is located at 1370 Hwy 49, Picton, Ontario.

Please see the attached Notice of Intention to Apply under Ontario Regulation 79/15 for Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant.

In support of this application, and in accordance with O. Reg. 79/15 and Lehigh's current ECA approval, Lehigh has scheduled the first of two public meetings.

Public Meeting #1 will be held as a virtual information session, consisting of a presentation given by members of the Project team and a question-and-answer period.

The virtual information session (webinar) will be held on Thursday April 7, 2022 at 6:00 p.m. to 8:00 p.m.

To participate in the virtual event, which will be held using GoToWebinar, please register using the following link:

<https://attendee.gotowebinar.com/register/5859890522647676944>

After registering, you will receive a confirmation email containing information about joining the webinar. **Please note that pre-registration is required.**

If you have any questions, or would like additional information, please feel free to contact the Project team at [LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)

Kind regards,



**Jamie McEvoy**  
*Senior Air Quality Engineer, Project Manager*

On behalf of:



**Nick Papanicolaou**  
Environmental Manager  
Cell: (613) 438-0361

## Dabagh, Nadia

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** March 24, 2022 9:42 AM  
**To:** Dabagh, Nadia  
**Cc:** 21480803, Lehigh Low Carbon Fuels ECA Ontario; McEvoy, Jamie  
**Subject:** FW: Lehigh Cement Newsletter Apr 2021  
**Attachments:** 2148080301 Lehigh Notice of Intent to Apply.pdf

NOTE: This email chain appears to contain email from outside Golder

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**From:** Papanicolaou, Nektarios (Picton) CAN <Nektarios.Papanicolaou@lehighhanson.com>  
**Sent:** March 23, 2022 1:39 PM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Cc:** Schraeder, Carsten (Picton) CAN <Carsten.Schraeder@LehighHanson.com>  
**Subject:** RE: Lehigh Cement Newsletter Apr 2021

### EXTERNAL EMAIL

Good day Community Members,

Please accept this mail as you have previously expressed interest in participating in Lehigh Cements community stakeholder engagement. You may have seen a newsletter delivered Thursday, March 17<sup>th</sup>, 2022 with the attached Notice of Intent to apply. This notice is part of the public meeting notice under Ontario Regulation 79/15 notifying you of the public meeting to be held April 7<sup>th</sup>, 2022 at 6:00 pm.

Please see the project website link [www.lehighPictonALCF.ca](http://www.lehighPictonALCF.ca) for project details and registration details for the virtual meeting.

Questions and comments can be directed to a project email account; [LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)

Thank you

Nick

Nick Papanicolaou, BSc  
Environmental Manager  
[Nektarios.Papanicolaou@Lehighhanson.com](mailto:Nektarios.Papanicolaou@Lehighhanson.com)  
Lehigh Cement  
1370 Highway 49  
Picton, Ontario Canada K0K-2T0  
Phone: (613) 476 - 8636  
Mobile: (613) 438 - 0361  
Please consider your environmental responsibility before printing this e-mail





## Dabagh, Nadia

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** March 29, 2022 4:34 PM  
**To:** Dabagh, Nadia  
**Cc:** Capstick, Sean; McEvoy, Jamie  
**Subject:** FW: ALCF Notice and Meeting

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

NOTE: This email chain appears to contain email from outside Golder

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**From:** [REDACTED] >  
**Sent:** March 29, 2022 1:19 PM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Subject:** Re: ALCF Notice and Meeting

### EXTERNAL EMAIL

Dear Lehigh Hanson -

I congratulate you on your effort to reduce carbon emissions - it is the #1 issue facing our world today..

I received your notice in the mail about upcoming meetings and a brief outline of what ALCF is. I am unable to attend the meeting on April 7, but would like to make a couple of comments and ask you to explain what the process of ALCF is.

From the notice, it explains that a variety of different materials will be collected - from construction materials to tire fibre and fluff. However, there is no information explaining what is done with these materials. I am assuming they will be burned to create the power to run the plant. If my assumption is correct, I would appreciate having several questions responded to...

1/ How will the emissions from the ALCF system differ from the carbon emissions?

2/ How will the emissions from the ALCF be cleaned before being discharged?

3/ I would imagine that the ALCF system will require new on-site generators - where will they be located?

4/ Where will the ALCF be stored on-site?

5? Will there be an increase in noise level from this new operation?

I once again thank Lehigh Hanson for this initiative - I sincerely hope that it is as good as it sounds. I do want to remind you that on a number of occasions, in the past, citizens have complained about noise and emissions - I hope this new operation will not create new problems for your surrounding neighbours.

I look forward to receiving your response.

Sincerely,

[REDACTED]

[REDACTED]

## Dabagh, Nadia

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** March 29, 2022 8:05 PM  
**To:** Dabagh, Nadia  
**Cc:** McEvoy, Jamie  
**Subject:** FW: ALCF

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

NOTE: This email chain appears to contain email from outside Golder

-----Original Message-----

**From:** [REDACTED]  
**Sent:** March 29, 2022 5:27 PM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Subject:** ALCF

EXTERNAL EMAIL

We are interested in knowing what are the main Low Carbon Fuels you are interested in using?

Thanks,

[REDACTED]

## Dabagh, Nadia

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** March 29, 2022 8:05 PM  
**To:** Dabagh, Nadia  
**Cc:** McEvoy, Jamie  
**Subject:** FW: Incineration Plans

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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-----Original Message-----

**From:** [REDACTED]  
**Sent:** March 29, 2022 5:10 PM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Subject:** Incineration Plans

EXTERNAL EMAIL

We think if done under the right environmental controls for toxic emissions, and pollution this is a great idea. I hope you are able to carry through with this proposal. Good luck with getting this project off the ground. You would think with the number of professional, educated, environmentally conscious people moving into Prince Edward County a venture like this would be welcome. I'm sure you will meet some resistance and will have your work cut out for you, but we wish you a successful conclusion with your endeavours.

[REDACTED]

Sent from my iPad

## Dabagh, Nadia

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**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** March 30, 2022 7:41 PM  
**To:** Dabagh, Nadia  
**Cc:** Papanicolaou, Nektarios (Picton) CAN; McEvoy, Jamie  
**Subject:** FW:

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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FYI

Nick – there is a request here for the Mar 1 deputation. Is that public info?

---

**From:** [REDACTED] >  
**Sent:** March 30, 2022 7:39 PM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Subject:**

### EXTERNAL EMAIL

Hi, could I please get a copy of the presentation materials on this from the recent deputation to the Environmental Advisory Committee in Prince Edwards county? Also if you could add me to your notification lists that would be great. I own a house in the county, on Hwy 49 near the plant.

Thanks,

[REDACTED]

## Dabagh, Nadia

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**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** March 30, 2022 8:30 AM  
**To:** Dabagh, Nadia  
**Cc:** McEvoy, Jamie  
**Subject:** FW: Notice under Ontario Regulation 79/15

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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**From:** Papanicolaou, Nektarios (Picton) CAN <Nektarios.Papanicolaou@lehighhanson.com>  
**Sent:** March 30, 2022 8:29 AM  
**To:** [REDACTED] >  
**Cc:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Subject:** RE: Notice under Ontario Regulation 79/15

### EXTERNAL EMAIL

Good day [REDACTED],

Thank you for the interest in better understanding the ALCF project.

Here are 2 points I can provide hopefully to address your concern, in addition, please do register for the upcoming meeting to hear more.

1. Lehigh Cement is currently working under a Noise Abatement Action Plan and annually implementing actions to improve the current noise levels from the facility.
2. The ALCF project equipment will be small in relation to the existing plant equipment but still designed for mitigating any potential noise concerns. Part of the permit application process will require to study the noise impacts of any new equipment and demonstrate compliance with noise standards. This will be presented in more detail in the 2 public meetings.

I hope this information helps, let me know if you have any further questions.

Thank you

Nick



---

**From:** [REDACTED] >  
**Sent:** March 30, 2022 8:15 AM  
**To:** Papanicolaou, Nektarios (Picton) CAN <[Nektarios.Papanicolaou@lehighhanson.com](mailto:Nektarios.Papanicolaou@lehighhanson.com)>  
**Subject:** Notice under Ontario Regulation 79/15

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Hello Nick,

With respect to Lehigh Hanson's intention to use ALCF, our question is what impact, if any, this application, if approved, would have on the noise levels emanating from the plant?

As we are inside during the colder months, noise has not been an issue. However, last summer the noise level on a number of occasions was a concern. On at least two evenings, we cancelled our plan to have dinner on our deck because the noise level made it uncomfortable. With COVID hopefully on the decline, we are hoping this summer to be able to entertain family and friends.

We look forward to your response.

[REDACTED]

**Dabagh, Nadia**

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** March 31, 2022 3:08 PM  
**To:** [REDACTED]  
**Subject:** RE: Public Meeting on the use of ALCFs at the Lehigh Cement Plant

NOTE: This email chain appears to contain email from outside Golder

Hi [REDACTED],

You should now be registered – looking forward to your feedback! Let us know if you do not get the confirmation.

Thanks,



**Jamie McEvoy**  
*Senior Air Quality Engineer, Project Manager*

On behalf of:



**Nick Papanicolaou**  
Environmental Manager  
Cell: (613) 438-0361

-----Original Message-----

**From:** [REDACTED] >  
**Sent:** March 30, 2022 8:23 PM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Subject:** Public Meeting on the use of ALCFs at the Lehigh Cement Plant

EXTERNAL EMAIL

Please register me for the upcoming Public Meeting on the use of ALCFs at the Picton Cement plant

[REDACTED]

## Dabagh, Nadia

---

**From:** Papanicolaou, Nektarios (Picton) CAN <Nektarios.Papanicolaou@lehighhanson.com>  
**Sent:** April 4, 2022 8:45 AM  
**To:** Schraeder, Carsten (Picton) CAN; Nobles, Ray R (Indianapolis) USA; van de Wetering, Jasper (Delta) CAN; Eaton, Melissa D (Picton) CAN; Melcher, David (Allentown) USA  
**Cc:** LehighPictonALCF@golder.com; McEvoy, Jamie; Dabagh, Nadia; Capstick, Sean  
**Subject:** RE: Lehigh Cement ALCF Questions

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi all,

I would like to organize a short meeting to review the response to County Conservancy.

I'll send an invite for 11am and adjust accordingly with any conflicts.

Thanks

Nick

---

**From:** Papanicolaou, Nektarios (Picton) CAN  
**Sent:** April 2, 2022 7:13 PM  
**To:** Schraeder, Carsten (Picton) CAN <Carsten.Schraeder@LehighHanson.com>; Nobles, Ray R (Indianapolis) USA <ray.nobles@lehighhanson.com>; van de Wetering, Jasper (Delta) CAN <Jasper.vandeWetering@lehighhanson.com>; Eaton, Melissa (Picton) CAN (Melissa.Eaton@lehighhanson.com) <Melissa.Eaton@lehighhanson.com>; Melcher, David (Allentown) USA <David.Melcher@lehighhanson.com>  
**Cc:** LehighPictonALCF@golder.com; McEvoy, Jamie <Jamie\_McEvoy@golder.com>; Dabagh, Nadia <Nadia.Dabagh@wsp.com>; Capstick, Sean (Sean\_Capstick@golder.com) <Sean\_Capstick@golder.com>  
**Subject:** FW: Lehigh Cement ALCF Questions

Hi all,

I received the below correspondence today with respect to the ALCF application. On Friday evening I received a call from a Ryan Wallach who provides legal representation on behalf of Quinte Conservancy. I expressed at that time it would be best if he and others register for the meeting and likely many of the questions and concerns would be addressed, nonetheless, please see below list of questions with request to respond before the public meeting # 1.

Let me know your thoughts on best way to respond.

Thanks

Nick

---

**From:** County Conservancy <[countyconservancy@gmail.com](mailto:countyconservancy@gmail.com)>  
**Sent:** April 2, 2022 5:17 PM  
**To:** Papanicolaou, Nektarios (Picton) CAN <[Nektarios.Papanicolaou@lehighhanson.com](mailto:Nektarios.Papanicolaou@lehighhanson.com)>

**Subject:** Lehigh Cement ALCF Questions

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Mr. Papanicolaou,

The Prince Edward County Conservancy has hundreds of residents on our distribution list, most of whom live in and around Picton Bay. Our goal is to understand the impact of industry and development on our residents and the environment. There should be no higher priority in Environmental Policy than protecting the Air that we Breathe and the Water that we Drink.

As residents, we are looking for complete transparency and compliance from industry. Unfortunately this is not always the case. Understandably, the residents have many questions and concerns related to the new energy source that Lehigh Cement is seeking to use.

Below is a list of questions that we would like answered. Preferably, we would like to have your responses back prior to the April 7th meeting so we can share your responses with our residents.

1. The Lehigh Cement Plant was built in the 1950's. Your presentation to Council states that ALCF's use state-of-the-art technology. Explain in detail how you are going to achieve state-of-the-art technology with a plant that is close to 70 years old.
2. The St. Mary's cement plant in Bowmanville, went through a similar process a few years ago. There appears to be several issues relating to emissions and odours that continue to this day. How will Lehigh Cement ensure that Picton does not turn into the next Bowmanville with the cement plant endangering the health of residents. One of the key points to note is the Lehigh Cement plant is situated on a small bay surrounded by residential and rural residential properties, unlike Bowmanville.
3. St. Mary's Cement Inc. was forced to spend approximately \$1.9M in a settlement under the Clean Air Act in the US, to reduce harmful emissions of nitrogen oxides (NOx) by approximately 2,700 tons per year across all four kilns at the Dixon Plant. What levels of NOx are currently being produced at your plant and how are they going to be monitored going forward?
4. With the lack of corporate and government accountability when it comes to environmental concerns, it is often left to citizen watchdog groups to force companies to be compliant as was the case with the Essroc Plant in 2017. Explain how Lehigh Cement is going to be different?
5. Will the Lehigh Cement plant be doing any processing of waste or recyclables on site to create ALCFs?
6. What is the source material of these ALCFs?
7. Please lay out the percentages of fuel (coal, petcoke, Natural Gas) that are currently being used and how these percentages will change with the introduction of ALCF's?
8. What is the energy strategy for Lehigh going forward (1 year, 5 years, 10 years)? Will coal and Petcoke be phased out as a fuel in the coming years, if so when?
9. Will you be conducting a traffic study and will the study comprehend the forecast of ALCF's in the coming years?
10. How are the ALCFs being stored onsite and if so how will you manage the storm water runoff?
11. Explain how Lehigh Cement will be taking any precautions to ensure that contaminants from ALCFs will not end up on neighbouring properties or in Picton Bay? Do you currently have baseline measurements for both air and water contaminants?
12. With predominant west prevailing winds, odour will be an issue with many residents. Will any of the ALCFs, Lehigh Cement is planning on using have odours and if so, how will you mitigate the odours to make sure that they are contained on site so as not to be an issue for your neighbours?
13. Dust has been a continual issue with the cement plant. What precautions is Lehigh Cement taking to ensure that dust is contained and not falling into the water and on neighbouring properties?
14. Will there be a continuous process of monitoring emissions to safeguard the environment?
15. Will the public be kept regularly informed of the results of emissions tests? If so, how often?
16. What commitments is Lehigh Cement agreeing to in order to monitor water quality/pollution of Picton Bay?
17. Will the handling or use of ALCFs at the Lehigh Cement plant generate additional or unique noise? If so, what precautions will Lehigh Cement take to keep noise levels inside the guidelines of the New Noise By-Law?
18. What will be Lehigh Cement's process for handling concerns and complaints from the County and its residents?

Thank you in advance for responding to our questions and concerns.

President, The County Conservancy

## The County Conservancy

## Dabagh, Nadia

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** April 6, 2022 2:08 PM  
**To:** Dabagh, Nadia  
**Subject:** FW: request for updates

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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**From:** [REDACTED] >  
**Sent:** April 5, 2022 4:59 PM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Subject:** request for updates

### EXTERNAL EMAIL

Hi,  
Please put me on your mailing list for future updates on this project.  
thank you,  
[REDACTED]

## Dabagh, Nadia

---

**From:** Papanicolaou, Nektarios (Picton) CAN <Nektarios.Papanicolaou@lehighhanson.com>  
**Sent:** April 5, 2022 10:06 AM  
**To:** Schraeder, Carsten (Picton) CAN; Capstick, Sean; McEvoy, Jamie; Dabagh, Nadia; van de Wetering, Jasper (Delta) CAN; Nobles, Ray R (Indianapolis) USA; Eaton, Melissa D (Picton) CAN; Melcher, David (Allentown) USA  
**Subject:** FW: Lehigh Cement ALCF Questions

Hi all,

Can we accommodate moving the meeting time to 12:00?

Thanks

Nick

---

**From:** County Conservancy <countyconservancy@gmail.com>  
**Sent:** April 5, 2022 9:59 AM  
**To:** Papanicolaou, Nektarios (Picton) CAN <Nektarios.Papanicolaou@lehighhanson.com>  
**Cc:** ryan\_wallach@comcast.com  
**Subject:** Re: Lehigh Cement ALCF Questions

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Hello Nick,

Thank you for your response. Unfortunately Ryan has another meeting at 11:00. Would you happen to be available at 12:00?

Thank you,  
Leslie

On Tue, Apr 5, 2022 at 6:59 AM Papanicolaou, Nektarios (Picton) CAN <[Nektarios.Papanicolaou@lehighhanson.com](mailto:Nektarios.Papanicolaou@lehighhanson.com)> wrote:

Good day County Conservancy, Mr Ryan Wallach.

Thank you for your interest in the Lehigh Cement ALCF project.

While the public meetings will address many of the concerns listed below. Lehigh would like to extend the opportunity for a "pre-meeting" this Thursday, 11:00 am, ideally via Microsoft Teams where we can speak to the project and answer any additional questions.



Please let me know if this can be arranged with an appropriate group size. Voicemail has been left with Mr. Wallach.

Please confirm with the email addresses of those who would attend and we can organize a meeting invite.

Thank you,

Nick

**Nick Papanicolaou**

Environmental Manager

Lehigh Cement

[1370 Hwy 49](#), Box 6201

Picton, ON K0K 2T0

Direct: (613) 476-8636

Cell: (613) 438-0361

[nektarios.papanicolaou@lehighhanson.com](mailto:nektarios.papanicolaou@lehighhanson.com)

[www.lehighhanson.com](http://www.lehighhanson.com)



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**From:** County Conservancy <[countyconservancy@gmail.com](mailto:countyconservancy@gmail.com)>  
**Sent:** April 2, 2022 5:17 PM  
**To:** Papanicolaou, Nektarios (Picton) CAN <[Nektarios.Papanicolaou@lehighhanson.com](mailto:Nektarios.Papanicolaou@lehighhanson.com)>  
**Cc:** [REDACTED]  
**Subject:** Lehigh Cement ALCF Questions

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Mr. Papanicolaou,

The Prince Edward County Conservancy has hundreds of residents on our distribution list, most of whom live in and around Picton Bay. Our goal is to understand the impact of industry and development on our residents and the environment. There should be no higher priority in Environmental Policy than protecting the Air that we Breathe and the Water that we Drink.

As residents, we are looking for complete transparency and compliance from industry. Unfortunately this is not always the case. Understandably, the residents have many questions and concerns related to the new energy source that Lehigh Cement is seeking to use.

Below is a list of questions that we would like answered. Preferably, we would like to have your responses back prior to the April 7th meeting so we can share your responses with our residents.

1. The Lehigh Cement Plant was built in the 1950's. Your presentation to Council states that ALCF's use state-of-the-art technology. Explain in detail how you are going to achieve state-of-the-art technology with a plant that is close to 70 years old.
2. The St. Mary's cement plant in Bowmanville, went through a similar process a few years ago. There appears to be several issues relating to emissions and odours that continue to this day. How will Lehigh Cement ensure that Picton does not turn into the next Bowmanville with the cement plant endangering the health of residents. One of the key points to note is the Lehigh Cement plant is situated on a small bay surrounded by residential and rural residential properties, unlike Bowmanville.
3. St. Mary's Cement Inc. was forced to spend approximately \$1.9M in a settlement under the Clean Air Act in the US, to reduce harmful emissions of nitrogen oxides (NOx) by approximately 2,700 tons per year across all four kilns at the Dixon Plant. What levels of NOx are currently being produced at your plant and how are they going to be monitored going forward?
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6. What is the source material of these ALCFs?
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10. How are the ALCFs being stored onsite and if so how will you manage the storm water runoff?
11. Explain how Lehigh Cement will be taking any precautions to ensure that contaminants from ALCFs will not end up on neighbouring properties or in Picton Bay? Do you currently have baseline measurements for both air and water contaminants?
12. With predominant west prevailing winds, odour will be an issue with many residents. Will any of the ALCFs, Lehigh Cement is planning on using have odours and if so, how will you mitigate the odours to make sure that they are contained on site so as not to be an issue for your neighbours?
13. Dust has been a continual issue with the cement plant. What precautions is Lehigh Cement taking to ensure that dust is contained and not falling into the water and on neighbouring properties?
14. Will there be a continuous process of monitoring emissions to safeguard the environment?
15. Will the public be kept regularly informed of the results of emissions tests? If so, how often?
16. What commitments is Lehigh Cement agreeing to in order to monitor water quality/pollution of Picton Bay?
17. Will the handling or use of ALCFs at the Lehigh Cement plant generate additional or unique noise? If so, what precautions will Lehigh Cement take to keep noise levels inside the guidelines of the New Noise By-Law?
18. What will be Lehigh Cement's process for handling concerns and complaints from the County and its residents?

Thank you in advance for responding to our questions and concerns.

Leslie Stewart

President, The County Conservancy

The County Conservancy

## Dabagh, Nadia

---

**From:** Takoo, Nupur  
**Sent:** April 7, 2022 6:16 PM  
**To:** Dabagh, Nadia  
**Subject:** FW: ALCF Meeting Questions

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

FYI

**Nupur Takoo**, *She/Her/Hers*  
User Experience Specialist, MCA



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---

**From:** Berry, Melrose <melrose.berry@wsp.com>  
**Sent:** April 7, 2022 4:17 AM  
**To:** Takoo, Nupur <nupur.takoo@wsp.com>  
**Subject:** FW: ALCF Meeting Questions



**Melrose Berry, CMP, CEM, HMCC**

Senior Marketing Communications Consultant  
National Events Leader – Earth and Environment  
she/her

T+ 1 770 496-1893  
M+ 1 404 992-0575



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Atlanta, GA 30341

[wsp.com](http://wsp.com)

---

**From:** [REDACTED] >  
**Sent:** Wednesday, April 6, 2022 6:24 PM  
**To:** Berry, Melrose <[melrose.berry@wsp.com](mailto:melrose.berry@wsp.com)>  
**Subject:** ALCF Meeting Questions

As a very close resident, I would like this initiative to go away!

Is there no other way that you can achieve reducing your carbon footprint than this alternative fuel initiative which imposes a potentially devastating penalty on the surrounding community?

I will listen to your presentation on Thursday,

\_\_\_\_\_

[illegible]

## Dabagh, Nadia

---

**From:** Takoo, Nupur  
**Sent:** April 7, 2022 6:17 PM  
**To:** Dabagh, Nadia  
**Subject:** FW: Thanks for the Reminder

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

FYI

Nupur Takoo, She/Her/Hers  
User Experience Specialist, MCA  
Chat with me on Teams!  
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-----Original Message-----

**From:** [REDACTED]  
**Sent:** Thursday, April 7, 2022 8:25 AM  
**To:** Berry, Melrose <melrose.berry@wsp.com>  
**Subject:** Fwd: Thanks for the Reminder

I may not be able to join tomorrow's session but I have read the questions submitted by [REDACTED]. As a close neighbour, across the Bay, I would like to know how your initiative will impact the quality of life on Picton Bay of all your neighbours.

> I understand your desire to remain in business, but we as neighbours deserve respect and an acceptable quality of use of our property.

>

> Thank you in advance for your consideration of our concerns.

>

> Kind regards,

>

> [REDACTED]

[REDACTED]

>

## Dabagh, Nadia

---

**From:** Takoo, Nupur  
**Sent:** April 7, 2022 5:46 PM  
**To:** Dabagh, Nadia  
**Subject:** FW: Reminder: Public Meeting #1: Lehigh Picton, Alternative Low Carbon Fuel Use starts in 1 Day

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

FYI

**Nupur Takoo**, *She/Her/Hers*  
User Experience Specialist, MCA



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---

**From:** Berry, Melrose <melrose.berry@wsp.com>  
**Sent:** April 7, 2022 2:45 PM  
**To:** Takoo, Nupur <nupur.takoo@wsp.com>  
**Subject:** FW: Reminder: Public Meeting #1: Lehigh Picton, Alternative Low Carbon Fuel Use starts in 1 Day



**Melrose Berry, CMP, CEM, HMCC**

Senior Marketing Communications Consultant  
National Events Leader – Earth and Environment  
she/her

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M+ 1 404 992-0575



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Atlanta, GA 30341

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---

**From:** [REDACTED]  
**Sent:** Thursday, April 7, 2022 5:24 PM  
**To:** Berry, Melrose <[melrose.berry@wsp.com](mailto:melrose.berry@wsp.com)>  
**Subject:** Re: Reminder: Public Meeting #1: Lehigh Picton, Alternative Low Carbon Fuel Use starts in 1 Day



Will I be able to ask a question during the webinar?



On Apr 6, 2022, at 5:58 PM, Melrose Berry <[customercare@gotowebinar.com](mailto:customercare@gotowebinar.com)> wrote:

This is a reminder that "Public Meeting #1: Lehigh Picton, Alternative Low Carbon Fuel Use" will begin in 1 Day on:

Thu, Apr 7, 2022 6:00 PM - 8:00 PM EDT

Add to Calendar: [Outlook® Calendar](#) | [Google Calendar™](#) | [iCal®](#)

Please send your questions, comments and feedback to: [melrose.berry@wsp.com](mailto:melrose.berry@wsp.com)

### How to Join the Webinar

1. Click the link to join the webinar at the specified time and date:

Join Webinar

*Note: This link should not be shared with others; it is unique to you.*

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Webinar ID: 880-344-539

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## Dabagh, Nadia

---

**From:** Leslie Stewart [REDACTED] >  
**Sent:** April 7, 2022 7:25 PM  
**To:** Papanicolaou, Nektarios (Picton) CAN  
**Cc:** [REDACTED]  
**Subject:** Re: County Conservancy - Lehigh ALCF  
**Attachments:** mime-attachment.ics  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hello,

Thank you for taking the time today to meet with us and walking us through your proposal.

Attached is the link to the document that I was referring to this morning. Zero Waste Europe is a not-for-profit with the aim of phasing out waste as a way to improve sustainability, economic resilience and social cohesion.

Their recommendation is to **exclude** Refuse Derived Fuels in cement plants. The report concludes that it has significant impacts on health and environment due to the polluting nature of the associated emissions and may undermine waste minimization efforts. Monitoring and reporting of burning RDF's are insufficient and negatively impact local communities.

[https://zerowasteurope.eu/wp-content/uploads/2020/11/zero\\_waste\\_europe\\_advisory-statement\\_why-co-incineration-of-waste-is-not-Taxonomy-compliant-and-should-be-excluded.pdf](https://zerowasteurope.eu/wp-content/uploads/2020/11/zero_waste_europe_advisory-statement_why-co-incineration-of-waste-is-not-Taxonomy-compliant-and-should-be-excluded.pdf)

Thank you,  
[REDACTED]

On Apr 5, 2022, at 11:00 AM, Papanicolaou, Nektarios (Picton) CAN  
<Nektarios.Papanicolaou@lehighhanson.com> wrote:

---

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---

## Dabagh, Nadia

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** April 8, 2022 10:11 AM  
**To:** Dabagh, Nadia  
**Subject:** FW: Re:

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**NOTE:** This email chain appears to contain email from outside Golder

Do we tell him it will be on the project website ?

**Jamie McEvoy, PEng**  
Senior Air Quality Engineer

T: +1 613 592 9600  
D: +1 613 592 9600 x3254  
C: 613-406-9485



---

**From:** [REDACTED] >  
**Sent:** April 8, 2022 8:32 AM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Subject:** Re:

### EXTERNAL EMAIL

I have received no acknowledgement of my email below, or materials of any kind. This is my second time contacting you. Please respond.

Thanks,  
[REDACTED]

On Wed, Mar 30, 2022 at 7:38 PM [REDACTED] > wrote:

Hi, could I please get a copy of the presentation materials on this from the recent deputation to the Environmental Advisory Committee in Prince Edwards county? Also if you could add me to your notification lists that would be great. I own a house in the county, on Hwy 49 near the plant.

Thanks,  
[REDACTED]

## Dabagh, Nadia

---

**From:** Takoo, Nupur  
**Sent:** April 11, 2022 10:32 AM  
**To:** Dabagh, Nadia  
**Subject:** FW: feedback

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Nupur Takoo**, *She/Her/Hers*  
User Experience Specialist, MCA



[Chat with me on Teams!](#)

D: +1 604 296 2790



---

**From:** Berry, Melrose <melrose.berry@wsp.com>  
**Sent:** April 11, 2022 6:56 AM  
**To:** Takoo, Nupur <nupur.takoo@wsp.com>  
**Subject:** FW: feedback



**Melrose Berry, CMP, CEM, HMCC**

Senior Marketing Communications Consultant  
National Events Leader – Earth and Environment  
she/her

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M+ 1 404 992-0575



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Building 100, Suite 300  
Atlanta, GA 30341

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---

**From:** [REDACTED]  
**Sent:** Friday, April 8, 2022 9:29 PM  
**To:** Berry, Melrose <[melrose.berry@wsp.com](mailto:melrose.berry@wsp.com)>  
**Subject:** feedback

Hello:

I still have a question about the high temperature needed for a cement kiln and whether using the alternate fuel will achieve that temperature. Is natural gas still needed to make sure that the temperature is attained. Thank you. [REDACTED]

--

[REDACTED]

## Dabagh, Nadia

---

**From:** Takoo, Nupur  
**Sent:** April 11, 2022 10:32 AM  
**To:** Dabagh, Nadia  
**Subject:** FW: Thank you for attending Public Meeting #1: Lehigh Picton, Alternative Low Carbon Fuel Use

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Nupur Takoo,** *She/Her/Hers*  
User Experience Specialist, MCA



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---

**From:** Berry, Melrose <melrose.berry@wsp.com>  
**Sent:** April 11, 2022 6:56 AM  
**To:** Takoo, Nupur <nupur.takoo@wsp.com>  
**Subject:** FW: Thank you for attending Public Meeting #1: Lehigh Picton, Alternative Low Carbon Fuel Use



**Melrose Berry, CMP, CEM, HMCC**

Senior Marketing Communications Consultant  
National Events Leader – Earth and Environment  
she/her

T+ 1 770 496-1893  
M+ 1 404 992-0575



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---

**From:** [REDACTED] >  
**Sent:** Friday, April 8, 2022 8:44 PM  
**To:** Berry, Melrose <[melrose.berry@wsp.com](mailto:melrose.berry@wsp.com)>  
**Subject:** Re: Thank you for attending Public Meeting #1: Lehigh Picton, Alternative Low Carbon Fuel Use



During the meeting I asked in the chat if Lehigh is paying for the local limestone and how much, but I have not seen an answer.

I think the plan to use ALCFs is good but regretfully it will not make a big dent in your CO2 emissions (about 10%) - still worth pursuing though, in part because of other benefits

On 2022-04-08 8:31 p.m., Melrose Berry wrote:

We hope you enjoyed our webinar.

Please send your questions, comments and feedback to: [melrose.berry@wsp.com](mailto:melrose.berry@wsp.com).

You are receiving this email because you registered for this webinar. Your email address and personal information will be used by the Webinar organizer to communicate with you about this event and their other services. To review the organizer's privacy policy or stop receiving these communications, please contact the organizer directly.

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## Dabagh, Nadia

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** April 11, 2022 9:00 AM  
**To:** Dabagh, Nadia  
**Subject:** FW: Re:

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

NOTE: This email chain appears to contain email from outside Golder

**Jamie McEvoy, PEng**  
Senior Air Quality Engineer

T: +1 613 592 9600  
D: +1 613 592 9600 x3254  
C: 613-406-9485



---

**From:** [REDACTED]  
**Sent:** April 9, 2022 2:33 PM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Subject:** Re: Re:

### EXTERNAL EMAIL

Thanks Jamie, appreciate it. Hope the meeting went well. All the best, [REDACTED]

On Fri, Apr 8, 2022 at 2:58 PM LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)> wrote:

NOTE: This email chain appears to contain email from outside Golder

Hi [REDACTED],

Apologies for the delay. You have been added to the notification list for the next Public Meeting.

Please find attached the meeting slides from the Mar 1<sup>st</sup> deputation to the Environmental Advisory Committee.

Also, public meeting #1 was held last night, and if you were unable to attend, it will be posted on the public website shortly.

Kind Regards,

The Lehigh Hanson Project Team



**Jamie McEvoy**  
*Senior Air Quality Engineer, Project Manager*

On behalf of:



**Nick Papanicolaou**

Environmental Manager

Cell: (613) 438-0361

---

**From:** [REDACTED] >  
**Sent:** April 8, 2022 8:32 AM  
**To:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Subject:** Re:

**EXTERNAL EMAIL**

I have received no acknowledgement of my email below, or materials of any kind. This is my second time contacting you. Please respond.

Thanks,

[REDACTED]

On Wed, Mar 30, 2022 at 7:38 PM [REDACTED] wrote:

Hi, could I please get a copy of the presentation materials on this from the recent deputation to the Environmental Advisory Committee in Prince Edwards county? Also if you could add me to your notification lists that would be great. I own a house in the county, on Hwy 49 near the plant.

Thanks,

[REDACTED]

## Dabagh, Nadia

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** April 11, 2022 9:00 AM  
**To:** Dabagh, Nadia  
**Subject:** FW: Lehigh Picton Project Team Future Updates

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

NOTE: This email chain appears to contain email from outside Golder

**Jamie McEvoy, PEng**  
Senior Air Quality Engineer

T: +1 613 592 9600  
D: +1 613 592 9600 x3254  
C: 613-406-9485



---

**From:** [REDACTED] >  
**Sent:** April 10, 2022 11:26 PM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Subject:** Lehigh Picton Project Team Future Updates

### EXTERNAL EMAIL

Greetings!

My daughter Ava (gr8 PECL) and I think this sounds really interesting and a potentially valuable tool for reducing the amount of garbage we send to landfill.

We noticed in the that with Golder's help the Picton Lehigh Plant massively reduced its emission of mercury since the adoption of their Toxic substance reduction plan. This is very positive.

Looking forward to your updates, relevant links and information available from the webinar

Thanks!



[Sent from Yahoo Mail on Android](#)

## Dabagh, Nadia

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** April 11, 2022 9:00 AM  
**To:** Dabagh, Nadia  
**Subject:** FW: Lehigh Picton Project Team Future Updates

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

NOTE: This email chain appears to contain email from outside Golder

**Jamie McEvoy, PEng**  
Senior Air Quality Engineer

T: +1 613 592 9600  
D: +1 613 592 9600 x3254  
C: 613-406-9485



---

**From:** [REDACTED]  
**Sent:** April 10, 2022 11:26 PM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Subject:** Lehigh Picton Project Team Future Updates

### EXTERNAL EMAIL

Greetings!

My daughter [REDACTED] and I think this sounds really interesting and a potentially valuable tool for reducing the amount of garbage we send to landfill.

We noticed in the that with Golder's help the Picton Lehigh Plant massively reduced its emission of mercury since the adoption of their Toxic substance reduction plan. This is very positive.

Looking forward to your updates, relevant links and information available from the webinar

Thanks!

[REDACTED]

[Sent from Yahoo Mail on Android](#)

## Dabagh, Nadia

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** April 13, 2022 12:02 PM  
**To:** Dabagh, Nadia  
**Subject:** FW: RE: Lehigh Cement Newsletter Apr 2021

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

NOTE: This email chain appears to contain email from outside Golder

**Jamie McEvoy, PEng**  
Senior Air Quality Engineer

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D: +1 613 592 9600 x3254  
C: 613-406-9485



---

**From:** [REDACTED]  
**Sent:** April 13, 2022 10:49 AM  
**To:** Papanicolaou, Nektarios (Picton) CAN <Nektarios.Papanicolaou@lehighhanson.com>; LehighPictonALCF <LehighPictonALCF@golder.com>  
**Cc:** [REDACTED] >  
**Subject:** Re: RE: Lehigh Cement Newsletter Apr 2021

### EXTERNAL EMAIL

Please note new email is [REDACTED]

Thanks, [REDACTED]

----- Original Message -----

From: [Nektarios.Papanicolaou@lehighhanson.com](mailto:Nektarios.Papanicolaou@lehighhanson.com)  
To: [LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)  
Cc: [Carsten.Schraeder@LehighHanson.com](mailto:Carsten.Schraeder@LehighHanson.com)



Sent: Wednesday, March 23, 2022 1:39 PM  
Subject: RE: Lehigh Cement Newsletter Apr 2021

Good day Community Members,

Please accept this mail as you have previously expressed interest in participating in Lehigh Cements community stakeholder engagement. You may have seen a newsletter delivered Thursday, March 17<sup>th</sup>, 2022 with the attached Notice of Intent to apply. This notice is part of the public meeting notice under Ontario Regulation 79/15 notifying you of the public meeting to be held April 7<sup>th</sup>, 2022 at 6:00 pm.

Please see the project website link [www.lehighPictonALCF.ca](http://www.lehighPictonALCF.ca) for project details and registration details for the virtual meeting.

Questions and comments can be directed to a project email account;  
[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)

Thank you

Nick

Nick Papanicolaou, BSc  
Environmental Manager  
[Nektarios.Papanicolaou@Lehighhanson.com](mailto:Nektarios.Papanicolaou@Lehighhanson.com)

Lehigh Cement  
1370 Highway 49  
Picton, Ontario Canada K0K-2T0  
Phone: (613) 476 - 8636  
Mobile: (613) 438 - 0361

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**Ministry of Heritage, Sport,  
Tourism and Culture Industries**

Programs and Services Branch  
400 University Ave, 5<sup>th</sup> Flr  
Toronto, ON M7A 2R9  
Tel: 437.522.6582

**Ministère des Industries du Patrimoine,  
du Sport, du Tourisme et de la Culture**

Direction des programmes et des services  
400, av. University, 5e étage  
Toronto, ON M7A 2R9  
Tél: 437.239.3404



January 26, 2021

EMAIL ONLY

Nick Papanicolaou  
Lehigh Hanson Materials Limited, Picton Plant  
Environmental Manager, Canada  
Phone: 613-438-0361  
LehighPictonALCF@golder.com

**MHSTCI File** : 0016258  
**Proponent** : Lehigh Hanson Materials Limited  
**Subject** : Notice of Intention to Apply under Ontario Regulation 79/15  
**Project** : Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant  
**Location** : Picton, Ontario

Dear Nick Papanicolaou:

Thank you for providing the Ministry of Heritage, Sport, Tourism and Culture Industries (MHSTCI) with the Notice of Intent to Apply for the above-referenced project. MHSTCI's interest in this Environmental Compliance Approval project relates to its mandate of conserving Ontario's cultural heritage, which includes:

- archaeological resources, including land and marine;
- built heritage resources, including bridges and monuments; and
- cultural heritage landscapes.

Under the ECA process, the proponent is required to determine a project's potential impact on known (previously recognized) and potential cultural heritage resources.

### **Project Summary**

Lehigh Hanson Materials Ltd. (Lehigh), a part of Heidelberg Cement, is undertaking efforts to use Alternative Low Carbon Fuels (ALCFs) to supplement the energy required to make Portland Cement at their Picton Cement Plant (the Site). ALCFs are in use in many cement plants all over the world and represent a state-of-the-art technology to reduce greenhouse gas emissions. The use of ALCFs is a key component of Heidelberg Cement's global carbon reduction strategy and diverts non-recyclable materials from landfills. The Site is located at 1370 Hwy 49, Picton Ontario.

### **Identifying Cultural Heritage Resources**

While some cultural heritage resources may have already been formally identified, others may be identified through screening and evaluation.

### **Archaeological Resources**

This ECA project may impact archaeological resources and should be screened using the MHSTCI [Criteria for Evaluating Archaeological Potential](#) and [Criteria for Evaluating Marine](#)

[Archaeological Potential](#) to determine if an archaeological assessment is needed. MHSTCI archaeological sites data are available at [archaeology@ontario.ca](mailto:archaeology@ontario.ca).

If the EA project area exhibits archaeological potential, then an archaeological assessment (AA) should be undertaken by an archaeologist licenced under the *Ontario Heritage Act (OHA)*, who is responsible for submitting the report directly to MHSTCI for review.

### **Built Heritage Resources and Cultural Heritage Landscapes**

A Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment will be undertaken for the entire study area during the planning phase and will be summarized in the ECA Report. This study will:

1. Describe the existing baseline cultural heritage conditions within the study area by identifying all known or potential built heritage resources and cultural heritage landscapes, including a historical summary of the study area. MHSTCI has developed screening criteria that may assist with this exercise: [Criteria for Evaluating for Potential Built Heritage Resources and Cultural Heritage Landscapes](#).
2. Identify preliminary potential project-specific impacts on the known and potential built heritage resources and cultural heritage landscapes that have been identified. The report should include a description of the anticipated impact to each known or potential built heritage resource or cultural heritage landscape that has been identified.
3. Recommend measures to avoid or mitigate potential negative impacts to known or potential built heritage resources and cultural heritage landscapes. The proposed mitigation measures are to inform the next steps of project planning and design.

Given that this project covers a large study area, MHSTCI recommends that the Cultural Heritage Report is carried out so that step 1 described above is undertaken early in the planning process. Then, steps 2 and 3 can be undertaken once the preferred alternatives have been selected.

Cultural Heritage Reports will be undertaken by a qualified person who has expertise, recent experience, and knowledge relevant to the type of cultural heritage resources being considered and the nature of the activity being proposed.

Community input should be sought to identify locally recognized and potential cultural heritage resources. Sources include, but are not limited to, municipal heritage committees, historical societies and other local heritage organizations.

Cultural heritage resources are often of critical importance to Indigenous communities. Indigenous communities may have knowledge that can contribute to the identification of cultural heritage resources, and we suggest that any engagement with Indigenous communities includes a discussion about known or potential cultural heritage resources that are of value to them.

### **Environmental Assessment Reporting**

All technical cultural heritage studies and their recommendations are to be addressed and incorporated into ECA projects. Please advise MHSTCI whether any technical cultural heritage studies will be completed for this ECA project, and provide them to MHSTCI before issuing a Notice of Completion or commencing any work on the site. If screening has identified no known

or potential cultural heritage resources, or no impacts to these resources, please include the completed checklists and supporting documentation in the ECA report or file.

Thank you for consulting MHSTCI on this project and please continue to do so throughout the ECA process. If you have any questions or require clarification, please do not hesitate to contact me.

Sincerely,

Jack Mallon  
Heritage Planner  
Jack.mallon@Ontario.ca

Copied to:

Karla Barboza, Team Lead, Heritage Planning Unit, MHSTCI – [karla.barboza@ontario.ca](mailto:karla.barboza@ontario.ca)

It is the sole responsibility of proponents to ensure that any information and documentation submitted as part of their EA report or file is accurate. MHSTCI makes no representation or warranty as to the completeness, accuracy or quality of the any checklists, reports or supporting documentation submitted as part of the EA process, and in no way shall MHSTCI be liable for any harm, damages, costs, expenses, losses, claims or actions that may result if any checklists, reports or supporting documents are discovered to be inaccurate, incomplete, misleading or fraudulent.

Please notify MHSTCI (at [archaeology@ontario.ca](mailto:archaeology@ontario.ca)) if archaeological resources are impacted by EA project work. All activities impacting archaeological resources must cease immediately, and a licensed archaeologist is required to carry out an archaeological assessment in accordance with the Ontario Heritage Act and the Standards and Guidelines for Consultant Archaeologists.

If human remains are encountered, all activities must cease immediately, and the local police and coroner must be contacted. In situations where human remains are associated with archaeological resources, MHSTCI should also be notified (at [archaeology@ontario.ca](mailto:archaeology@ontario.ca)) to ensure that the site is not subject to unlicensed alterations which would be a contravention of the Ontario Heritage Act.

## Dabagh, Nadia

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** April 19, 2022 7:51 AM  
**To:** Capstick, Sean  
**Cc:** Dabagh, Nadia; McEvoy, Jamie; Papanicolaou, Nektarios (Picton) CAN  
**Subject:** FW: MHSTCI Letter - ECA - Lehigh Picton Cement Plant  
**Attachments:** 2022-04-14-Lehigh-ECA-0016258.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

NOTE: This email chain appears to contain email from outside Golder

Sean,

Please see attached – can we please discuss this today?

Thanks,

**Jamie McEvoy, PEng**  
Senior Air Quality Engineer

T: +1 613 592 9600  
D: +1 613 592 9600 x3254  
C: 613-406-9485



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**From:** Mallon, Jack (MHSTCI) <Jack.Mallon@ontario.ca>  
**Sent:** April 14, 2022 3:47 PM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Cc:** Barboza, Karla (MHSTCI) <Karla.Barboza@ontario.ca>  
**Subject:** MHSTCI Letter - ECA - Lehigh Picton Cement Plant

### EXTERNAL EMAIL

Good afternoon,

Please see attached MHSTCI's comments on the Lehigh Picton Cement Plant ECA.

Do not hesitate to contact me if you have any questions.

Regards,

**Jack Mallon**  
Heritage Planner

Heritage Planning Unit | Programs and Services Branch

Heritage, Tourism and Culture Division

Ministry of Heritage, Sport, Tourism and Culture Industries

Phone: 437-522-6582

## Dabagh, Nadia

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**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** April 20, 2022 3:43 PM  
**To:** Dabagh, Nadia; Papanicolaou, Nektarios (Picton) CAN  
**Subject:** FW: Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant  
**Attachments:** Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

[NOTE: This email chain appears to contain email from outside Golder](#)

FYI

**Jamie McEvoy, PEng**  
Senior Air Quality Engineer

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D: +1 613 592 9600 x3254  
C: 613-406-9485



---

**From:** Kaitlin Hill <KaitlinH@curvelake.ca>  
**Sent:** April 20, 2022 1:45 PM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Cc:** Julie Kapyrka <JulieK@curvelake.ca>  
**Subject:** Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

### EXTERNAL EMAIL

Good afternoon Nick,

Please find attached a letter from Curve Lake First Nation in regard to the proposed Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant.

We look forward to hearing from you.

Miigwech,  
Kaitlin H.

**Kaitlin Hill**  
**Lands and Resources Consultation Liaison**  
**Curve Lake First Nation**  
**Government Services Building**





22 Winookeeda Street, Curve Lake, ON K0L 1R0

P: 705.657.8045 ext 222 F: 705.657.8708

W: [www.curvelakefirstnation.ca](http://www.curvelakefirstnation.ca)

E: [KaitlinH@curvelake.ca](mailto:KaitlinH@curvelake.ca)

Government Services Building  
22 Winookeedaa Road  
Curve Lake, Ontario K0L1R0



Phone: 705.657.8045  
Fax: 705.657.8708  
[www.curvelakefirstnation.ca](http://www.curvelakefirstnation.ca)

April 7, 2022  
VIA E-MAIL

Nick Papanicolaou  
Lehigh Hanson Materials Limited, Picton  
Plant  
Environmental Manager, Canada  
Phone: 613-438-0361  
[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)

**RE: Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant**

Dear Nick,

I would like to acknowledge receipt of correspondence, which was received on March 16<sup>th</sup>, 2022 regarding the above noted project. As you may be aware, the area in which your project is proposed is situated within the Traditional Territory of Curve Lake First Nation. Our First Nation's Territory is incorporated within the Williams Treaties Territory and was the subject of a claim under Canada's Specific Claims Policy, which has now been settled. All 7 First Nations within the Williams Treaties have had their harvesting rights legally re-affirmed and recognized through this settlement.

Curve Lake First Nation is requiring a File Fee for this project in the amount of \$250.00 as outlined in our *Consultation and Accommodation Standards*. This Fee includes project updates as well as review of standard material and project overviews. Depending on the amount of documents to be reviewed by the Consultation Department, additional fees may apply. **Please make this payment to Curve Lake First Nation Consultation Department and please indicate the project name or number on the cheque.**

If you do not have a copy of *Curve Lake First Nation's Consultation and Accommodation Standards* they are available at <https://www.curvelakefirstnation.ca/services-departments/lands-rights-resources/consultation/>. Hard copies are available upon request.

Based on the information that you have provided us with respect to the proposed Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant project, Curve Lake First Nation may require a Special Consultation Framework for this project. Information on this Framework can be found on page 9 of our *Consultation and Accommodation Standards* document.

In order to assist us in providing you with timely input, it would be appreciated if you could provide a summary statement indicating how the project will address the following areas that are of concern to our First Nation within our Traditional and Treaty Territory: possible environmental impact to our drinking water; endangerment to fish and wild game; impact on Aboriginal heritage and cultural values; and to endangered species; lands; savannas etc.

Government Services Building  
22 Winookeedaa Road  
Curve Lake, Ontario K0L1R0



Phone: 705.657.8045  
Fax: 705.657.8708  
[www.curvelakefirstnation.ca](http://www.curvelakefirstnation.ca)

After the information is reviewed it is expected that you or a representative will be in contact to make arrangements to discuss this matter in more detail and possibly set up a date and time to meet with Curve Lake First Nation in person (or virtually).

Although we have not conducted exhaustive research nor have we the resources to do so, there may be the presence of burial or archaeological sites in your proposed project area. Please note, that we have particular concern for the remains of our ancestors. Should excavation unearth bones, remains, or other such evidence of a native burial site or any other archaeological findings, we must be notified without delay. In the case of a burial site, Council reminds you of your obligations under the *Cemeteries Act* to notify the nearest First Nation Government or other community of Aboriginal people which is willing to act as a representative and whose members have a close cultural affinity to the interred person. As I am sure you are aware, the regulations further state that the representative is needed before the remains and associated artifacts can be removed. Should such a find occur, we request that you contact our First Nation immediately.

Furthermore, Curve Lake First Nation also has available, trained Cultural Heritage Liaisons who are able to actively participate in the archaeological assessment process as a member of a field crew, the cost of which will be borne by the proponent. **Curve Lake First Nation expects engagement at Stage 1 of an archaeological assessment** so that we may include Indigenous Knowledge of the land in the process. We insist that at least one of our Cultural Heritage Liaisons be involved in any Stage 2-4 assessments, including test pitting, and/or pedestrian surveys to full excavation.

Although we may not always have representation at all stakeholder meetings, as rights holders', it is our wish to be kept apprised throughout all phases of this project. Please note that this letter does not constitute consultation, but it does represent the initial engagement process.

Should you have further questions or if you wish to hire a Liaison for a project, please contact Julie Kapyrka or Kaitlin Hill, Lands and Resources Consultation Liaisons, at 705-657-8045 or via email at [JulieK@Curvelake.ca](mailto:JulieK@Curvelake.ca) and [KaitlinH@Curvelake.ca](mailto:KaitlinH@Curvelake.ca).

Yours sincerely,

Chief Emily Whetung  
Curve Lake First Nation

---

**From:** County Conservancy <[countyconservancy@gmail.com](mailto:countyconservancy@gmail.com)>

**Sent:** May 27, 2022 8:32 AM

**To:** Papanicolaou, Nektarios (Picton) CAN <[Nektarios.Papanicolaou@lehighhanson.com](mailto:Nektarios.Papanicolaou@lehighhanson.com)>

**Cc:** Wallach, Ryan <[Ryan.Wallach@comcast.com](mailto:Ryan.Wallach@comcast.com)>; Leslie Stewart <[leslie.stewart92@gmail.com](mailto:leslie.stewart92@gmail.com)>;

<>; John Hirsch <[jhirsch@pecounty.on.ca](mailto:jhirsch@pecounty.on.ca)>; sferguson@pecounty.on.ca; Marcia Wallace

<[mwallace@pecounty.on.ca](mailto:mwallace@pecounty.on.ca)>

**Subject:** Lehigh Cement ALCF Questions - Follow-up

**External Email** - Please use proper judgment and caution when opening attachments, clicking links, or responding. Report suspicious emails with SPAM PHISH button.

We, the County Conservancy, are waiting for your response to the questions we raised prior to the first public meeting regarding the introduction of ALCFs at the Picton Plant. Please let us know when we can expect a response and when Lehigh Cement plans to hold the second Public Meeting.

As we discussed at our last meeting, Lehigh was going to provide information regarding the implementation of ALCFs at their two plants in Western Canada.

For your convenience, we have restated the questions below;

1. The Lehigh Cement Plant was built in the 1950's. Your presentation to Council states that ALCF's use state-of-the-art technology. Explain in detail how you are going to achieve state-of-the-art technology with a plant that is close to 70 years old.
2. The St. Mary's cement plant in Bowmanville, went through a similar process a few years ago. There appears to be several issues relating to emissions and odours that continue to this day. How will Lehigh Cement ensure that Picton does not turn into the next Bowmanville with the cement plant endangering the health of residents. One of the key points to note is the Lehigh Cement plant is situated on a small bay surrounded by residential and rural residential properties, unlike Bowmanville.
3. St. Mary's Cement Inc. was forced to spend approximately \$1.9M in a settlement under the Clean Air Act in the US, to reduce harmful emissions of nitrogen oxides (NOx) by approximately 2,700 tons per year across all four kilns at the Dixon Plant. What levels of NOx are currently being produced at your plant and how are they going to be monitored going forward?
4. With the lack of corporate and government accountability when it comes to environmental concerns, it is often left to citizen watchdog groups to force companies to be compliant as was the case with the Essroc Plant in 2017. Explain how Lehigh Cement is going to be different?
5. Will the Lehigh Cement plant be doing any processing of waste or recyclables on site to create ALCFs?
6. What is the source material of these ALCFs?
7. Please lay out the percentages of fuel (coal, petcoke, Natural Gas) that are currently being used and how these percentages will change with the introduction of ALCF's?
8. What is the energy strategy for Lehigh going forward (1 year, 5 years, 10 years)? Will coal and Petcoke be phased out as a fuel in the coming years, if so when?
9. Will you be conducting a traffic study and will the study comprehend the forecast of ALCF's in the coming years?
10. How are the ALCFs being stored onsite and if so how will you manage the storm water runoff?
11. Explain how Lehigh Cement will be taking any precautions to ensure that contaminants from ALCFs will not end up on neighbouring properties or in Picton Bay? Do you currently have baseline measurements for both air and water contaminants?
12. With predominant west prevailing winds, odour will be an issue with many residents. Will any of the ALCFs, Lehigh Cement is planning on using have odours and if so, how will you mitigate the odours to make sure that they are contained on site so as not to be an issue for your neighbours?
13. Dust has been a continual issue with the cement plant. What precautions is Lehigh Cement taking to ensure that dust is contained and not falling into the water and on neighbouring properties?
14. Will there be a continuous process of monitoring emissions to safeguard the environment?
15. Will the public be kept regularly informed of the results of emissions tests? If so, how often?
16. What commitments is Lehigh Cement agreeing to in order to monitor water quality/pollution of Picton Bay?
17. Will the handling or use of ALCFs at the Lehigh Cement plant generate additional or unique noise? If so, what precautions will Lehigh Cement take to keep noise levels inside the guidelines of the New Noise By-Law?
18. What will be Lehigh Cement's process for handling concerns and complaints from the County and its residents?

Ken Stewart

County Conservancy

## Dabagh, Nadia

---

**From:** County Conservancy <countyconservancy@gmail.com>  
**Sent:** June 14, 2022 7:55 AM  
**To:** Dabagh, Nadia  
**Cc:** McEvoy, Jamie; Capstick, Sean; Papanicolaou, Nektarios (Picton) CAN; LehighPictonALCF; [REDACTED]  
**Subject:** Re: Lehigh Cement ALCF Questions

Nadia,

Perhaps I missed it but when is Public Meeting #2 scheduled?

[REDACTED]  
County Conservancy

On Mon, Jun 13, 2022 at 10:29 AM Dabagh, Nadia <[Nadia.Dabagh@wsp.com](mailto:Nadia.Dabagh@wsp.com)> wrote:

Hello [REDACTED] and the County Conservancy,

Apologies, I realized that the email below was not sent to you and your team. Please see the email chain below for responses to your questions regarding Lehigh Picton Cement ALCFs.

Thank you,

Nadia

**Nadia Dabagh**, *she / her*

Environmental Planner

Earth & Environment

T+ 1 289-835-2519

**wsp** **GOLDER**

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**From:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>

**Sent:** June 10, 2022 4:35 PM

**Cc:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>; McEvoy, Jamie <[jamie.mcevoy@wsp.com](mailto:jamie.mcevoy@wsp.com)>; Dabagh, Nadia <[Nadia.Dabagh@wsp.com](mailto:Nadia.Dabagh@wsp.com)>; Capstick, Sean <[sean.capstick@wsp.com](mailto:sean.capstick@wsp.com)>; Papanicolaou, Nektarios (Picton) CAN <[Nektarios.Papanicolaou@lehighhanson.com](mailto:Nektarios.Papanicolaou@lehighhanson.com)>

**Subject:** RE: Lehigh Cement ALCF Questions

**NOTE:** This email chain appears to contain email from outside Golder

Dear [REDACTED] and the County Conservancy,

Thank you for your email, question and attendance at our Public Meeting # 1. Let me first begin with an apology to the delay in response. the ALCF project team understood that the private meeting held before our Public Meeting # 1 where we addressed your questions was the requested response and where additional information was provided. Please find below responses to your questions in [blue](#). The ALCF project team very much appreciates the County Conservancy team, experience and interest in Lehigh's ALCF project assisting in the reduction of GHG emissions from the facility.

We look forward to meeting at our Public Meeting # 2 where additional detail will be provided to ensure you are better informed on the project.

Kind regards,

The Lehigh Hanson Project Team



**Jamie McEvoy**  
*Senior Air Quality Engineer, Project Manager*

On behalf of:



**Nick Papanicolaou**

Environmental Manager

**From:** County Conservancy <[countyconservancy@gmail.com](mailto:countyconservancy@gmail.com)>

**Sent:** May 27, 2022 8:32 AM

**To:** Papanicolaou, Nektarios (Picton) CAN <[Nektarios.Papanicolaou@lehighhanson.com](mailto:Nektarios.Papanicolaou@lehighhanson.com)>

**Cc:** Wallach, Ryan <[Ryan.Wallach@comcast.com](mailto:Ryan.Wallach@comcast.com)>; Leslie Stewart <[leslie.stewart92@gmail.com](mailto:leslie.stewart92@gmail.com)>; [REDACTED]; [REDACTED]; John Hirsch <[jhirsch@pecounty.on.ca](mailto:jhirsch@pecounty.on.ca)>; [sferguson@pecounty.on.ca](mailto:sferguson@pecounty.on.ca); Marcia Wallace <[mwallace@pecounty.on.ca](mailto:mwallace@pecounty.on.ca)>

**Subject:** Lehigh Cement ALCF Questions - Follow-up

**External Email** - Please use proper judgment and caution when opening attachments, clicking links, or responding. Report suspicious emails with SPAM PHISH button.

Mr. Papanicolaou,

We, the County Conservancy, are waiting for your response to the questions we raised prior to the first public meeting regarding the introduction of ALCFs at the Picton Plant. Please let us know when we can expect a response and when Lehigh Cement plans to hold the second Public Meeting.

As we discussed at our last meeting, Lehigh was going to provide information regarding the implementation of ALCFs at their two plants in Western Canada.

For your convenience, we have restated the questions below;

1. The Lehigh Cement Plant was built in the 1950's. Your presentation to Council states that ALCF's use state-of-the-art technology. Explain in detail how you are going to achieve state-of-the-art technology with a plant that is close to 70 years old.
  - The utilization of ALCF's worldwide has allowed for specialized equipment for the handling and combustion equipment. Lehigh is working with experienced design engineering firms who utilize the latest technologies in the procurement of these equipment to ensure complete combustion and stable operation.
2. The St. Mary's cement plant in Bowmanville, went through a similar process a few years ago. There appears to be several issues relating to emissions and odours that continue to this day. How will Lehigh Cement ensure that Picton does not turn into the next Bowmanville with the cement plant endangering the health of residents. One of the key points to note is the Lehigh Cement plant is situated on a small bay surrounded by residential and rural residential properties, unlike Bowmanville.



- O.Reg 79/15 describes the consultation and technical reporting requirements to ensure the equipment, storage, fuels and emissions demonstrate compliance to applicable standards. O.Reg 79/15 has been amended to account for changes in the industry and experiences. Lehigh is committed to working through the required steps to prevent and correct any non-conformance relating to the ALCF use.
3. St. Mary's Cement Inc. was forced to spend approximately \$1.9M in a settlement under the Clean Air Act in the US, to reduce harmful emissions of nitrogen oxides (NOx) by approximately 2,700 tons per year across all four kilns at the Dixon Plant. What levels of NOx are currently being produced at your plant and how are they going to be monitored going forward?
- NOx emissions are continuously monitored by continuous emissions monitoring equipment (CEMs). the CEM's are calibrated daily, audited via third party Relative Accuracy Test Audits and third party verified annually to demonstrate compliance to applicable standards, Lehigh Picton plant is compliant to the federal and provincial standards for NOx emissions. Lehigh Picton plant emitted 1468 tonnes of NOx in 2021.
4. With the lack of corporate and government accountability when it comes to environmental concerns, it is often left to citizen watchdog groups to force companies to be compliant as was the case with the Essroc Plant in 2017. Explain how Lehigh Cement is going to be different?
- Lehigh has actively committed to stakeholder engagement, regularly hosting community relations meetings and delivering newsletters during times of covid lockdown to keep our stakeholders up to date with operations. Lehigh makes understanding the concerns from neighbours a commitment and has demonstrated to act on concerns by implementing improvements, providing technical reasoning and quantification to respond to concerns.
5. Will the Lehigh Cement plant be doing any processing of waste or recyclables on site to create ALCFs?
- The current application is foreseen to receive "only" ready to use processed fuels. These fuels must meet the criteria set forth in O.Reg 79/15 demonstrating compliance. No processing of materials, waste generation etc is considered in this permit application.
6. What is the source material of these ALCFs?
- The ALCF application details 4 types of fuels. The source of those fuels is market dependent.
7. Please lay out the percentages of fuel (coal, petcoke, Natural Gas) that are currently being used and how these percentages will change with the introduction of ALCF's?
- Currently natural gas is utilized at the facility to facilitate pre-heating the kiln until sufficient temperature for solid fuels combustion. Historically, natural gas makes up approximately .5% of the total fuel consumption. Going forward, it is foreseen that the utilization of NG will increase along with ALCF's reducing the usage of solid fuels.

8. What is the energy strategy for Lehigh going forward (1 year, 5 years, 10 years)? Will coal and Petcoke be phased out as a fuel in the coming years, if so when?
- HeidelbergCement / Lehigh's sustainability goals will seek lower GHG intensity options while maintaining compliance and competitiveness. The energy strategy is to source lower GHG emitting fuels, optimize our process reducing energy consumption and optimize our product mix to reduce the total embedded carbon in our final cement products. Heidelberg Cement has set ambitious targets for 2030 and the Picton plant is seeking a ALCF permit as one step towards achieving these targets and reducing our reliance on fossil fuels.
9. Will you be conducting a traffic study and will the study comprehend the forecast of ALCF's in the coming years?
- The current ALCF application is for a maximum of 200 tpd, approximately an average of 8 trucks per day or an anticipated maximum of 12 trucks per day. A screening of this this traffic demand does not foresee the requirement of a traffic study on the impact to HWY 49 traffic. The ALCF storage building design is to allow the potential for truck delivery during the weekdays and no delivery on the weekends where possible to mitigate any traffic impacts.
10. How are the ALCFs being stored onsite and if so how will you manage the storm water runoff?
- Lehigh has prepared the conceptual storage and material handling system design to be presented in Public Meeting # 2. The storage building will allow for truck unloading within an enclosed building, all storage of ALCF's will be within the enclosed building. The ALCF's will be received dry and remain dry in the enclosed building, as such, there is no pile runoff from the ALCF project
11. Explain how Lehigh Cement will be taking any precautions to ensure that contaminants from ALCFs will not end up on neighbouring properties or in Picton Bay? Do you currently have baseline measurements for both air and water contaminants?
- Lehigh will be conducting laboratory analysis and Emission Summary Dispersion Modelling to demonstrate compliance for any ALCF's to be used under the appropriate regulatory standards. These standards are defined to protect the environment and human health.
12. With predominant west prevailing winds, odour will be an issue with many residents. Will any of the ALCFs, Lehigh Cement is planning on using have odours and if so, how will you mitigate the odours to make sure that they are contained on site so as not to be an issue for your neighbours?
- It is currently foreseen that the ALCF's to be used will be non-odorous, nonetheless, the minimal storage would be under cover to remain dry and limit the risks of any odour.
13. Dust has been a continual issue with the cement plant. What precautions is Lehigh Cement taking to ensure that dust is contained and not falling into the water and on neighbouring properties?
- Lehigh continues to make investments for continuous improvements to process equipment and fugitive dust emissions. The ALCF project is not anticipated to contribute any incremental increase to particulate emissions.

14. Will there be a continuous process of monitoring emissions to safeguard the environment?

- Yes, Lehigh continuously monitors emissions as part of its ECA. This monitoring also confirms complete combustion. Third party verification and auditing of the CEMs confirms compliance to O.reg 419/05 which sets the standards for protecting the local air, environment and human health. Furthermore, process monitoring and controls will be proposed in the ALCF application which will only allow the use of ALCF's such that sufficient temperature, residence time and operating conditions will allow for the complete combustion. These controls will ensure that ALCF's will only be utilized during normal process running conditions and not for low temperature pre-heating periods as an example.

15. Will the public be kept regularly informed of the results of emissions tests? If so, how often?

- Lehigh will provide Emission Summary Dispersion Modelling results in public meeting # 2 which will highlight any potential increase in emissions and demonstrating compliance. The final permit issued by the MECP would determine any future emission testing program for the use of ALCFs.

16. What commitments is Lehigh Cement agreeing to in order to monitor water quality/pollution of Picton Bay?

- Lehigh cement instituted a large project which allows for the facility to operate on a water recirculation system vs drawing water from the bay. A stormwater management plan describes how all water on the property discharges to our South Quarry settling pond. The water supply and recirculation of plant water comes from and back to the South Quarry. Discharge water from the South Quarry is monitored as per MISA requirements whereby Lehigh monitors loading of discharge water via weekly sampling and conducts acute / chronic testing quarterly. Lehigh has historically demonstrated compliance with discharge water and its storm water management plan, the ALCF project is not anticipated to impact discharge water.

17. Will the handling or use of ALCFs at the Lehigh Cement plant generate additional or unique noise? If so, what precautions will Lehigh Cement take to keep noise levels inside the guidelines of the New Noise By-Law?

- It is not foreseen that the ALCF equipment would generate significant noise sources. An acoustic model of the new noise sources will be executed to ensure noise is mitigated to meet applicable noise standards and presented in PM # 2. The ALCF equipment will be small in relation to the existing equipment at the facility. The facility is undergoing an Acoustic Abatement Action Plan where investments are being made annually to further reduce the noise from existing equipment.

18. What will be Lehigh Cement's process for handling concerns and complaints from the County and its residents?

- Lehigh responds to all concerns raised as per its ECA and reports the concern and any corrective actions to the local district officer of the Ministry of Environment, Conservation and Parks. In General, a Lehigh representative would meet to understand any concern, address and / or provide feedback to the circumstance.

---

**From:** County Conservancy <[countyconservancy@gmail.com](mailto:countyconservancy@gmail.com)>  
**Sent:** April 2, 2022 5:17 PM  
**To:** Papanicolaou, Nektarios (Picton) CAN <[Nektarios.Papanicolaou@lehighhanson.com](mailto:Nektarios.Papanicolaou@lehighhanson.com)>  
**Cc:** [REDACTED]  
**Subject:** Lehigh Cement ALCF Questions

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Mr. Papanicolaou,

The Prince Edward County Conservancy has hundreds of residents on our distribution list, most of whom live in and around Picton Bay. Our goal is to understand the impact of industry and development on our residents and the environment. There should be no higher priority in Environmental Policy than protecting the Air that we Breathe and the Water that we Drink.

As residents, we are looking for complete transparency and compliance from industry. Unfortunately this is not always the case. Understandably, the residents have many questions and concerns related to the new energy source that Lehigh Cement is seeking to use.

Below is a list of questions that we would like answered. Preferably, we would like to have your responses back prior to the April 7th meeting so we can share your responses with our residents.

1. The Lehigh Cement Plant was built in the 1950's. Your presentation to Council states that ALCF's use state-of-the-art technology. Explain in detail how you are going to achieve state-of-the-art technology with a plant that is close to 70 years old.
2. The St. Mary's cement plant in Bowmanville, went through a similar process a few years ago. There appears to be several issues relating to emissions and odours that continue to this day. How will Lehigh Cement ensure that Picton does not turn into the next Bowmanville with the cement plant endangering the health of residents. One of the key points to note is the Lehigh Cement plant is situated on a small bay surrounded by residential and rural residential properties, unlike Bowmanville.
3. St. Mary's Cement Inc. was forced to spend approximately \$1.9M in a settlement under the Clean Air Act in the US, to reduce harmful emissions of nitrogen oxides (NOx) by approximately 2,700 tons per year across all four kilns at the Dixon Plant. What levels of NOx are currently being produced at your plant and how are they going to be monitored going forward?
4. With the lack of corporate and government accountability when it comes to environmental concerns, it is often left to citizen watchdog groups to force companies to be compliant as was the case with the Essroc Plant in 2017. Explain how Lehigh Cement is going to be different?
5. Will the Lehigh Cement plant be doing any processing of waste or recyclables on site to create ALCFs?
6. What is the source material of these ALCFs?
7. Please lay out the percentages of fuel (coal, petcoke, Natural Gas) that are currently being used and how these percentages will change with the introduction of ALCF's?
8. What is the energy strategy for Lehigh going forward (1 year, 5 years, 10 years)? Will coal and Petcoke be phased out as a fuel in the coming years, if so when?
9. Will you be conducting a traffic study and will the study comprehend the forecast of ALCF's in the coming years?
10. How are the ALCFs being stored onsite and if so how will you manage the storm water runoff?
11. Explain how Lehigh Cement will be taking any precautions to ensure that contaminants from ALCFs will not end up on neighbouring properties or in Picton Bay? Do you currently have baseline measurements for both air and water contaminants?

12. With predominant west prevailing winds, odour will be an issue with many residents. Will any of the ALCFs, Lehigh Cement is planning on using have odours and if so, how will you mitigate the odours to make sure that they are contained on site so as not to be an issue for your neighbours?
13. Dust has been a continual issue with the cement plant. What precautions is Lehigh Cement taking to ensure that dust is contained and not falling into the water and on neighbouring properties?
14. Will there be a continuous process of monitoring emissions to safeguard the environment?
15. Will the public be kept regularly informed of the results of emissions tests? If so, how often?
16. What commitments is Lehigh Cement agreeing to in order to monitor water quality/pollution of Picton Bay?
17. Will the handling or use of ALCFs at the Lehigh Cement plant generate additional or unique noise? If so, what precautions will Lehigh Cement take to keep noise levels inside the guidelines of the New Noise By-Law?
18. What will be Lehigh Cement's process for handling concerns and complaints from the County and its residents?

Thank you in advance for responding to our questions and concerns.

Leslie Stewart

President, The County Conservancy

## The County Conservancy

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-LAEmHhHzdJzBITWfa4Hgs7pbKI

## Dabagh, Nadia

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** August 16, 2022 1:26 PM  
**To:** Dabagh, Nadia  
**Subject:** FW: August 25 2022 ALCF

NOTE: This email chain appears to contain email from outside Golder

Found this is in the junk folder.

-----Original Message-----

**From:** [REDACTED] >  
**Sent:** August 5, 2022 12:40 PM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Subject:** August 25 2022 ALCF

EXTERNAL EMAIL

Please include me in the next ALCF webinar meeting dated August 25 at 6:00 pm . Thank-you

## Dabagh, Nadia

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** August 10, 2022 7:26 AM  
**To:** Dabagh, Nadia  
**Subject:** FW: Alternative Low Carbon Fuel

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

-----Original Message-----

**From:** [REDACTED] >  
**Sent:** August 6, 2022 10:13 AM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Subject:** Alternative Low Carbon Fuel

EXTERNAL EMAIL

Great idea - anyone opposing this initiative is not aware of what goes on in cement production, ALCF is needed. Congratulations on the initiative, it's a shame IMO that you have to go through a lengthy and potentially risky consultation when it should be self evident that ALCF helps solve two problems - use less coke while reducing landfill

Regards,

[REDACTED]

Sent from my iPhone



<b>Follow Up Flag:</b>	Follow up
<b>Flag Status:</b>	Flagged

**External Email** - Please use proper judgment and caution when opening attachments, clicking links, or responding. Report suspicious emails with SPAM PHISH button.



\_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_

[illegible]

## Dabagh, Nadia

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** August 10, 2022 7:26 AM  
**To:** Dabagh, Nadia  
**Subject:** FW: Aug. 25 webinar -ALCF use at Lehigh Picton

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

[NOTE: This email chain appears to contain email from outside Golder](#)

Can you please look into?

thanks

---

**From:** [REDACTED] >  
**Sent:** August 8, 2022 9:48 AM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Subject:** Aug. 25 webinar -ALCF use at Lehigh Picton

### EXTERNAL EMAIL

Hi,

Please register me for the virtual information session on the use of alternative low-carbon fuels at the Lehigh Picton Cement Plant on Aug. 25 at 6pm.

The link to register noted in your recent ad is not active as it refers only to the April meeting.

Thank you.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



## Dabagh, Nadia

---

**From:** Merza, Header (MECP) <Header.Merza@ontario.ca>  
**Sent:** August 11, 2022 4:11 PM  
**To:** Dabagh, Nadia  
**Cc:** Kowalczyk, Jan (MECP); Duong, Michael (MECP); Orpana, Nancy (MECP); Shah, Bijal (MECP)  
**Subject:** Lehigh Picton Cement Plant - Notice of Public Meeting #2 - MECP ECA #0073-BHGQHC  
**Attachments:** 2148080301 Lehigh Notice of Public Meeting #2\_Final.pdf  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Good Afternoon Nadia et al,

I am forwarding this e-mail to the Ministry's air (Jan Kowalczyk) and noise (Michael Duong) engineers who worked on the current ECA # 0073-BHGQHC (Issue Date: October 31, 2019).

Regards,

Header Merza, P.Eng.  
Senior Noise Engineer

### Provincial Officer #1653

Approval Services Section – Noise  
Environmental Permissions Branch  
Ministry of the Environment, Conservation & Parks  
Environmental Assessment & Permissions Division  
135 St. Clair Avenue West, 1<sup>st</sup> Floor  
Toronto ON M4V 1P5  
**New Tel: (437)218-9283** Fax: (416)314-8452  
E-mail: [header.merza@ontario.ca](mailto:header.merza@ontario.ca)

**If you have any accommodation needs or require communication supports or alternate formats, please let me know.**

**Si vous avez des besoins en matière d'adaptation, ou si vous nécessitez des aides à la communication ou des médias substituts, veuillez me le faire savoir.**

---

**From:** Dabagh, Nadia <Nadia.Dabagh@wsp.com>  
**Sent:** Thursday, August 11, 2022 1:35 PM  
**Cc:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Subject:** Lehigh Picton Cement Plant - Notice of Public Meeting #2

**CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.**

Hello,

Lehigh Hanson Materials Ltd. (Lehigh), a part of Heidelberg Cement, is undertaking efforts to use Alternative Low Carbon Fuels (ALCFs) to supplement the energy required to make Portland Cement at their Picton Cement Plant (the Site). ALCFs are in use in many cement plants all over the world and represent a state-of-the-art technology to reduce greenhouse gas emissions. The use of ALCFs is a key component of Heidelberg Cement's global carbon reduction strategy and diverts non-recyclable materials from landfills. The Site is located at 1370 Hwy 49, Picton, Ontario.

Please see the attached Notice of Public Meeting #2 for Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant.

Public Meeting #1 was held on April 7, 2022 to provide an overview of the studies being undertaken and the proposed ALCF application. In support of this application, and in accordance with O. Reg. 79/15 and Lehigh's current ECA approval, Lehigh has now scheduled the second meeting to address comments received after the first public meeting, present the results of the technical studies, and provide next steps in the process.

Public Meeting #2 will be held as a virtual information session, consisting of a presentation given by members of the Project Team and a question-and-answer period. In-person viewing of the webinar can be arranged at the Lehigh Cement Plant upon request.

The virtual information session (webinar) will be held on Thursday, August 25, 2022 at 6:00 p.m. to 8:00 p.m.

To participate in the virtual event, which will be held using Microsoft Teams, please register using the following link:  
[https://teams.microsoft.com/join/VUljPQ\\_iBUKlpZZYpAKZmw,yU1kc2K7DkS1DIodLx2Qw,SYuYf1n\\_kEmNwaRof45O5A,YH5QhRoagUOgs\\_Ri4DI5PQ,61oJ65OarUaS6mfC3wce7g,u-7FW6f2z0ierQBSps8ymQ?mode=read&tenantId=3d234255-e20f-4205-88a5-9658a402999b](https://teams.microsoft.com/join/VUljPQ_iBUKlpZZYpAKZmw,yU1kc2K7DkS1DIodLx2Qw,SYuYf1n_kEmNwaRof45O5A,YH5QhRoagUOgs_Ri4DI5PQ,61oJ65OarUaS6mfC3wce7g,u-7FW6f2z0ierQBSps8ymQ?mode=read&tenantId=3d234255-e20f-4205-88a5-9658a402999b)

After registering, you will receive a confirmation email containing information about joining the webinar. **Please note that pre-registration is required.**

If you have any questions, or would like additional information, please feel free to contact the Project Team at [LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)

Kind regards,



**Nadia Dabagh**  
*Environmental Planner, Consultation Lead*

On behalf of:



**Nick Papanicolaou**  
Environmental Manager  
Cell: (613) 438-0361

---

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-LAEmHhHzdJzBITWfa4Hgs7pbKI

## Dabagh, Nadia

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**From:** Mailey, Shealyn (MECP) <Shealyn.Mailey@ontario.ca>  
**Sent:** August 11, 2022 2:25 PM  
**To:** Dabagh, Nadia  
**Subject:** RE: Lehigh Picton Cement Plant - Notice of Public Meeting #2

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Good Afternoon Nadia,

I hope you are doing well.

Thank you for your email, however I am no longer with the Belleville Office. The officer that has taken over the Lehigh file is Sharilyn Kennedy. I have forwarded her this email so she is aware of the meeting.

For future reference, Sharilyn can be reached at [Sharilyn.kennedy@Ontario.ca](mailto:Sharilyn.kennedy@Ontario.ca)

If you have any questions or concerns, please do not hesitate to reach out

Thank you  
Kind regards,  
Shealyn

---

**From:** Dabagh, Nadia <Nadia.Dabagh@wsp.com>  
**Sent:** August 11, 2022 1:35 PM  
**Cc:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Subject:** Lehigh Picton Cement Plant - Notice of Public Meeting #2

**CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.**

Hello,

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[https://teams.microsoft.com/join/VUljPQ\\_iBUKlpZZYpAKZmw,yU1kc2K7DkS1lDlodLx2Qw,sYyYf1n\\_kEmNwaRof45O5A,YH5QhRoagUOgs\\_Ri4DI5PQ,61oJ65OarUaS6mfC3wce7g,u-7FW6f2z0ierQBSps8ymQ?mode=read&tenantId=3d234255-e20f-4205-88a5-9658a402999b](https://teams.microsoft.com/join/VUljPQ_iBUKlpZZYpAKZmw,yU1kc2K7DkS1lDlodLx2Qw,sYyYf1n_kEmNwaRof45O5A,YH5QhRoagUOgs_Ri4DI5PQ,61oJ65OarUaS6mfC3wce7g,u-7FW6f2z0ierQBSps8ymQ?mode=read&tenantId=3d234255-e20f-4205-88a5-9658a402999b)

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Kind regards,



**Nadia Dabagh**  
*Environmental Planner, Consultation Lead*

On behalf of:



**Nick Papanicolaou**  
Environmental Manager  
Cell: (613) 438-0361

---

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## Dabagh, Nadia

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**From:** Williams, Ryan - M.P. <ryan.williams@parl.gc.ca>  
**Sent:** August 12, 2022 9:37 AM  
**To:** Dabagh, Nadia  
**Subject:** RE: Lehigh Picton Cement Plant - Notice of Public Meeting #2

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Nadia,

Thank you for the invitation. Unfortunately MP Williams is attending an event during that time but if you could pass along any notes that arise from the meeting we would appreciate it.



HOUSE OF COMMONS  
CHAMBRE DES COMMUNES  
CANADA

### The office of Ryan Williams

Member of Parliament  
Bay of Quinte

Phone: 613-969-3300

Email: [ryan.williams@parl.gc.ca](mailto:ryan.williams@parl.gc.ca)

250 Sidney Street  
Belleville, On  
K8P 3Z3

---

**From:** Dabagh, Nadia <Nadia.Dabagh@wsp.com>  
**Sent:** August 11, 2022 1:35 PM  
**Cc:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Subject:** Lehigh Picton Cement Plant - Notice of Public Meeting #2

Hello,

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Kind regards,



**Nadia Dabagh**  
*Environmental Planner, Consultation Lead*

On behalf of:



**Nick Papanicolaou**  
Environmental Manager  
Cell: (613) 438-0361

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-LAEEmHhHzdJzBITWfa4Hgs7pbKI

## Dabagh, Nadia

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**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** August 17, 2022 8:03 AM  
**To:** Dabagh, Nadia; Papanicolaou, Nektarios (Picton) CAN  
**Cc:** Capstick, Sean  
**Subject:** FW: Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant  
**Attachments:** Curve Lake - Low Carbon Fuels Lehigh Picton\_10 June 2022.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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Please see below – request to setup a call from the Curve Lake FN.

---

**From:** Francis M. Chua <francis@francischua.com>  
**Sent:** August 16, 2022 8:52 PM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Cc:** Julie Kapyrka <JulieK@curvelake.ca>; Kaitlin Hill (Curve Lake) (KaitlinH@curvelake.ca) <KaitlinH@curvelake.ca>; Kayla Wright <kayla@francischua.com>  
**Subject:** Re: Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

### EXTERNAL EMAIL

Hello to The Lehigh Hanson Project Team. Hello Jamie and Nick.

Thank you for your email below and thank you for your letter to Chief Whetung.

We are encouraged in particular to hear about working together to build a strong relationship between Curve Lake First Nation and Lehigh Hanson.

Myself and Kayla are supporting Curve Lake First Nation staff (Julie and Kaitlin) - all of whom are cc'd on this email. Please continue to correspond with Julie and Kaitlin. As long as you keep myself and Kayla in the loop we will continue to assist in this relationship building.

Our main goal is to obtain the information/documents/plans necessary to understand the project and assist with getting reviews done either by CLFN staff and/or supporting consultants. Part of this process is to determine if the project has set aside capacity funding to undertake these discussions and reviews.

If you have time this Friday for a meeting, please send me an invite. I am available from 12:30pm onward and we can have an initial discussion.

Thank you.

Sincerely,  
Francis Chua

Support to Curve Lake First Nation  
519-375-6749

---

**From:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Sent:** June 10, 2022 8:40 AM  
**To:** Kaitlin Hill <[KaitlinH@curvelake.ca](mailto:KaitlinH@curvelake.ca)>; LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Cc:** Julie Kapyrka <[JulieK@curvelake.ca](mailto:JulieK@curvelake.ca)>  
**Subject:** RE: Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

NOTE: This email chain appears to contain email from outside Golder

Good morning,

Please find attached our letter in response to your inquiry about the Low Carbon Fuel Project at Lehigh Picton.

We look forward to hearing from you.

Kind Regards,

The Lehigh Hanson Project Team



**Jamie McEvoy**  
*Senior Air Quality Engineer, Project Manager*

On behalf of:



**Nick Papanicolaou**  
Environmental Manager  
Cell: (613) 438-0361

---

**From:** Kaitlin Hill <[KaitlinH@curvelake.ca](mailto:KaitlinH@curvelake.ca)>  
**Sent:** April 20, 2022 1:45 PM  
**To:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Cc:** Julie Kapyrka <[JulieK@curvelake.ca](mailto:JulieK@curvelake.ca)>  
**Subject:** Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

**EXTERNAL EMAIL**

Good afternoon Nick,

Please find attached a letter from Curve Lake First Nation in regard to the proposed Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant.

We look forward to hearing from you.

Miigwech,  
Kaitlin H.



**Kaitlin Hill**  
**Lands and Resources Consultation Liaison**  
**Curve Lake First Nation**  
**Government Services Building**  
**22 Winookeeda Street, Curve Lake, ON K0L 1R0**  
**P: 705.657.8045 ext 222 F: 705.657.8708**  
**W: [www.curvelakefirstnation.ca](http://www.curvelakefirstnation.ca)**  
**E: [KaitlinH@curvelake.ca](mailto:KaitlinH@curvelake.ca)**

## Dabagh, Nadia

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** August 22, 2022 8:34 AM  
**To:** Dabagh, Nadia; Papanicolaou, Nektarios (Picton) CAN  
**Cc:** Capstick, Sean  
**Subject:** FW: Questions for meeting #2

NOTE: This email chain appears to contain email from outside Golder

FYI

-----Original Message-----

**From:** [REDACTED] >  
**Sent:** August 21, 2022 2:02 PM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Subject:** Questions for meeting #2

EXTERNAL EMAIL

I am registered for the meeting on the 25th but have a few questions for you:

1. Why are you not undertaking a Demonstration Project for three years that will test the project, sort out any issues and report back to the public on the results?
2. What are your sources of the the kiln dried RDF's you propose to burn? How much trucking is involved? What will be the Carbon Footprint of these steps prior to arrival at the plant?
3. What scrubbing processes do you propose to use to take out any Sulphur and Nitrous oxides prior to letting waste gases into the environment. The RDF's burnt in the kiln release Sulphur dioxides and Nitrogen dioxides as the waste gases cool at the top of the kiln.  
Scrubbers had to be installed at the St. Mary's plant in Bowmanville after their Demonstration Project. Do you have such scrubbers at the Picton plant?

Submitted by

[REDACTED]

## Dabagh, Nadia

---

**From:** Francis M. Chua <francis@francischua.com>  
**Sent:** August 24, 2022 5:13 PM  
**To:** LehighPictonALCF  
**Cc:** Julie Kapyrka; Kaitlin Hill (Curve Lake) (KaitlinH@curvelake.ca); Kayla Wright; Dabagh, Nadia; Papanicolaou, Nektarios (Picton) CAN; jmcevoy@wsp.com; Capstick, Sean; Elliott, Cassandra  
**Subject:** Re: Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Jamie.

I will be away for a couple of weeks. Would September 12 after 1pm work for you and your team? If so, please send an invite.

Thanks.

Sincerely,  
Francis Chua  
Support to Curve Lake First Nation  
519-375-6749

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** Wednesday, August 24, 2022 3:39 PM  
**To:** Francis M. Chua <francis@francischua.com>; LehighPictonALCF <LehighPictonALCF@golder.com>  
**Cc:** Julie Kapyrka <JulieK@curvelake.ca>; Kaitlin Hill (Curve Lake) (KaitlinH@curvelake.ca) <KaitlinH@curvelake.ca>; Kayla Wright <kayla@francischua.com>; Dabagh, Nadia <Nadia.Dabagh@wsp.com>; Papanicolaou, Nektarios (Picton) CAN <Nektarios.Papanicolaou@lehighhanson.com>; jmcevoy@wsp.com <jmcevoy@wsp.com>; Capstick, Sean <Sean\_Capstick@golder.com>; Elliott, Cassandra <Cassandra\_Elliott@golder.com>  
**Subject:** RE: Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

**NOTE:** This email chain appears to contain email from outside Golder

Hi Francis,

Does Thursday Sep 1<sup>st</sup>, 11 am to noon work for your team?

Thanks,  
Jamie

---

**From:** Francis M. Chua <francis@francischua.com>  
**Sent:** August 16, 2022 8:52 PM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Cc:** Julie Kapyrka <JulieK@curvelake.ca>; Kaitlin Hill (Curve Lake) (KaitlinH@curvelake.ca) <KaitlinH@curvelake.ca>;

Kayla Wright <kayla@francischua.com>

**Subject:** Re: Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

**EXTERNAL EMAIL**

Hello to The Lehigh Hanson Project Team. Hello Jamie and Nick.

Thank you for your email below and thank you for your letter to Chief Whetung.

We are encouraged in particular to hear about working together to build a strong relationship between Curve Lake First Nation and Lehigh Hanson.

Myself and Kayla are supporting Curve Lake First Nation staff (Julie and Kaitlin) - all of whom are cc'd on this email. Please continue to correspond with Julie and Kaitlin. As long as you keep myself and Kayla in the loop we will continue to assist in this relationship building.

Our main goal is to obtain the information/documents/plans necessary to understand the project and assist with getting reviews done either by CLFN staff and/or supporting consultants. Part of this process is to determine if the project has set aside capacity funding to undertake these discussions and reviews.

If you have time this Friday for a meeting, please send me an invite. I am available from 12:30pm onward and we can have an initial discussion.

Thank you.

Sincerely,  
Francis Chua  
Support to Curve Lake First Nation  
519-375-6749

---

**From:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>

**Sent:** June 10, 2022 8:40 AM

**To:** Kaitlin Hill <[KaitlinH@curvelake.ca](mailto:KaitlinH@curvelake.ca)>; LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>

**Cc:** Julie Kapyrka <[JulieK@curvelake.ca](mailto:JulieK@curvelake.ca)>

**Subject:** RE: Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

**NOTE:** This email chain appears to contain email from outside Golder

Good morning,

Please find attached our letter in response to your inquiry about the Low Carbon Fuel Project at Lehigh Picton.

We look forward to hearing from you.

Kind Regards,

The Lehigh Hanson Project Team



On behalf of:



**Nick Papanicolaou**  
Environmental Manager  
Cell: (613) 438-0361

---

**From:** Kaitlin Hill <[KaitlinH@curvelake.ca](mailto:KaitlinH@curvelake.ca)>  
**Sent:** April 20, 2022 1:45 PM  
**To:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Cc:** Julie Kapyrka <[JulieK@curvelake.ca](mailto:JulieK@curvelake.ca)>  
**Subject:** Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

**EXTERNAL EMAIL**

Good afternoon Nick,

Please find attached a letter from Curve Lake First Nation in regard to the proposed Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant.

We look forward to hearing from you.

Miigwech,  
Kaitlin H.



**Kaitlin Hill**  
Lands and Resources Consultation Liaison  
Curve Lake First Nation  
Government Services Building  
22 Winookeeda Street, Curve Lake, ON K0L 1R0  
P: 705.657.8045 ext 222 F: 705.657.8708  
W: [www.curvelakefirstnation.ca](http://www.curvelakefirstnation.ca)  
E: [KaitlinH@curvelake.ca](mailto:KaitlinH@curvelake.ca)

## Dabagh, Nadia

---

**From:** Leslie Stewart <leslie.stewart92@gmail.com>  
**Sent:** August 24, 2022 9:34 PM  
**To:** LehighPictonALCF  
**Cc:** countyconservancy@gmail.com [REDACTED] Papanicolaou, Nektarios  
(Picton) CAN; Dabagh, Nadia  
**Subject:** Re: Lehigh Picton Cement Plant - Notice of Public Meeting #2  
**Attachments:** 2148080301 Lehigh Notice of Public Meeting #2\_Final.pdf  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Jamie,

Thank you for following up. Unfortunately we are not available tomorrow night.

Leslie

Sent from my iPhone

On Aug 24, 2022, at 4:07 PM, LehighPictonALCF <LehighPictonALCF@golder.com> wrote:

[REDACTED]

We were reviewing the attendance list and noticed you were not registered. We wanted to follow up and make sure you were aware of the meeting tomorrow night and if you wanted to attend.

Any questions, please reach out to us.

Kind regards,



**Jamie McEvoy**  
*Senior Air Quality Engineer, Project  
Manager*

On behalf of:



**Nick Papanicolaou**

Environmental Manager

Cell: (613) 438-0361

## Dabagh, Nadia

---

**From:** Francis M. Chua <francis@francischua.com>  
**Sent:** August 25, 2022 1:26 PM  
**To:** LehighPictonALCF  
**Cc:** Julie Kapyrka; Kaitlin Hill (Curve Lake) (KaitlinH@curvelake.ca); Kayla Wright; Dabagh, Nadia; Papanicolaou, Nektarios (Picton) CAN; jmcevoy@wsp.com; Capstick, Sean; Elliott, Cassandra  
**Subject:** Re: Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Jamie. That works for me. Thanks and speak with you then.

~ Francis

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** Thursday, August 25, 2022 1:21 PM  
**To:** Francis M. Chua <francis@francischua.com>; LehighPictonALCF <LehighPictonALCF@golder.com>  
**Cc:** Julie Kapyrka <JulieK@curvelake.ca>; Kaitlin Hill (Curve Lake) (KaitlinH@curvelake.ca) <KaitlinH@curvelake.ca>; Kayla Wright <kayla@francischua.com>; Dabagh, Nadia <Nadia.Dabagh@wsp.com>; Papanicolaou, Nektarios (Picton) CAN <Nektarios.Papanicolaou@lehighhanson.com>; jmcevoy@wsp.com <jmcevoy@wsp.com>; Capstick, Sean <Sean\_Capstick@golder.com>; Elliott, Cassandra <Cassandra\_Elliott@golder.com>  
**Subject:** RE: Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

**NOTE:** This email chain appears to contain email from outside Golder

We are unavailable that day – Are you available on Wed Sep 14<sup>th</sup> @ 3pm?

---

**From:** Francis M. Chua <francis@francischua.com>  
**Sent:** August 24, 2022 5:13 PM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Cc:** Julie Kapyrka <JulieK@curvelake.ca>; Kaitlin Hill (Curve Lake) (KaitlinH@curvelake.ca) <KaitlinH@curvelake.ca>; Kayla Wright <kayla@francischua.com>; Dabagh, Nadia <Nadia.Dabagh@wsp.com>; Papanicolaou, Nektarios (Picton) CAN <Nektarios.Papanicolaou@lehighhanson.com>; jmcevoy@wsp.com; Capstick, Sean <Sean\_Capstick@golder.com>; Elliott, Cassandra <Cassandra\_Elliott@golder.com>  
**Subject:** Re: Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

### EXTERNAL EMAIL

Hi Jamie.

I will be away for a couple of weeks. Would September 12 after 1pm work for you and your team? If so, please send an invite.

Thanks.

Sincerely,  
Francis Chua  
Support to Curve Lake First Nation

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**Cc:** Julie Kapyrka <[JulieK@curvelake.ca](mailto:JulieK@curvelake.ca)>; Kaitlin Hill (Curve Lake) (<[KaitlinH@curvelake.ca](mailto:KaitlinH@curvelake.ca)> <[KaitlinH@curvelake.ca](mailto:KaitlinH@curvelake.ca)>; Kayla Wright <[kayla@francischua.com](mailto:kayla@francischua.com)>; Dabagh, Nadia <[Nadia.Dabagh@wsp.com](mailto:Nadia.Dabagh@wsp.com)>; Papanicolaou, Nektarios (Picton) CAN <[Nektarios.Papanicolaou@lehighhanson.com](mailto:Nektarios.Papanicolaou@lehighhanson.com)>; [jmcevoy@wsp.com](mailto:jmcevoy@wsp.com) <[jmcevoy@wsp.com](mailto:jmcevoy@wsp.com)>; Capstick, Sean <[Sean\\_Capstick@golder.com](mailto:Sean_Capstick@golder.com)>; Elliott, Cassandra <[Cassandra\\_Elliott@golder.com](mailto:Cassandra_Elliott@golder.com)>  
**Subject:** RE: Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

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Hi Francis,

Does Thursday Sep 1<sup>st</sup>, 11 am to noon work for your team?

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**Cc:** Julie Kapyrka <[JulieK@curvelake.ca](mailto:JulieK@curvelake.ca)>; Kaitlin Hill (Curve Lake) (<[KaitlinH@curvelake.ca](mailto:KaitlinH@curvelake.ca)> <[KaitlinH@curvelake.ca](mailto:KaitlinH@curvelake.ca)>; Kayla Wright <[kayla@francischua.com](mailto:kayla@francischua.com)>  
**Subject:** Re: Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

**EXTERNAL EMAIL**

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Support to Curve Lake First Nation  
519-375-6749

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**From:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Sent:** June 10, 2022 8:40 AM  
**To:** Kaitlin Hill <[KaitlinH@curvelake.ca](mailto:KaitlinH@curvelake.ca)>; LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Cc:** Julie Kapyrka <[JulieK@curvelake.ca](mailto:JulieK@curvelake.ca)>  
**Subject:** RE: Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

**NOTE:** This email chain appears to contain email from outside Golder

Good morning,

Please find attached our letter in response to your inquiry about the Low Carbon Fuel Project at Lehigh Picton.

We look forward to hearing from you.

Kind Regards,

The Lehigh Hanson Project Team



**Jamie McEvoy**  
*Senior Air Quality Engineer, Project Manager*

On behalf of:



**Nick Papanicolaou**  
Environmental Manager  
Cell: (613) 438-0361

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**From:** Kaitlin Hill <[KaitlinH@curvelake.ca](mailto:KaitlinH@curvelake.ca)>  
**Sent:** April 20, 2022 1:45 PM  
**To:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Cc:** Julie Kapyrka <[JulieK@curvelake.ca](mailto:JulieK@curvelake.ca)>  
**Subject:** Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

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We look forward to hearing from you.

Miigwech,  
Kaitlin H.



**Kaitlin Hill**  
**Lands and Resources Consultation Liaison**  
**Curve Lake First Nation**  
**Government Services Building**  
**22 Winookeeda Street, Curve Lake, ON K0L 1R0**  
**P: 705.657.8045 ext 222 F: 705.657.8708**  
**W: [www.curvelakefirstnation.ca](http://www.curvelakefirstnation.ca)**  
**E: [KaitlinH@curvelake.ca](mailto:KaitlinH@curvelake.ca)**





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\_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_





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**External Email** - Please use proper judgment and caution when opening attachments, clicking links, or responding. Report suspicious emails with SPAM PHISH button.

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**External Email** - Please use proper judgment and caution when opening attachments, clicking links, or responding. Report suspicious emails with SPAM PHISH button.



\_\_\_\_\_

[illegible]

<b>Follow Up Flag:</b>	Follow up
<b>Flag Status:</b>	Flagged

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\_\_\_\_\_

[illegible]

**External Email** - Please use proper judgment and caution when opening attachments, clicking links, or responding. Report suspicious emails with SPAM PHISH button.

**Figure 1**

I'll let the admin know, if you have any questions feel free to email me along the way and I will describe them. Sorry for this inconvenience.

Nick Papanicolaou

Environmental Manager

**External Email** - Please use proper judgment and caution when opening attachments, clicking links, or responding. Report suspicious emails with SPAM PHISH button.

■



## Dabagh, Nadia

---

**From:** [REDACTED] >  
**Sent:** August 25, 2022 6:50 PM  
**To:** LehighPictonALCF  
**Cc:** Dabagh, Nadia; Papanicolaou, Nektarios (Picton) CAN  
**Subject:** RE: Presentation August 25, 2022

Yes, this is VERY UNFORTUNATE. How can this be considered a public meeting if there is such limited method to communicate?

[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** Thursday, August 25, 2022 6:48 PM  
**To:** [REDACTED] >; LehighPictonALCF <LehighPictonALCF@golder.com>  
**Cc:** Dabagh, Nadia <Nadia.Dabagh@wsp.com>; Papanicolaou, Nektarios (Picton) CAN <Nektarios.Papanicolaou@lehighhanson.com>  
**Subject:** RE: Presentation August 25, 2022

NOTE: This email chain appears to contain email from outside Golder

Hi [REDACTED]

That is unfortunate – yes please send them here and I will relay to the rest of the team.

Thanks,  
Jamie

---

**From:** [REDACTED] >  
**Sent:** August 25, 2022 6:45 PM  
**To:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Cc:** [REDACTED]  
**Subject:** Presentation August 25, 2022

### EXTERNAL EMAIL

Chat Box DOES NOT WORK. Are you receiving this email? Is this email the vehicle for sending questions re the presentation?

[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]



## Dabagh, Nadia

---

**From:** [REDACTED] >  
**Sent:** August 25, 2022 6:52 PM  
**To:** LehighPictonALCF  
**Cc:** Dabagh, Nadia; Papanicolaou, Nektarios (Picton) CAN  
**Subject:** RE: Presentation August 25, 2022

I have a question regarding the process described. There was no mention of monitoring exhaust emissions, specifically, combusted plastics and other non-organic micromaterials?

[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** Thursday, August 25, 2022 6:48 PM  
**To:** [REDACTED] >; LehighPictonALCF <LehighPictonALCF@golder.com>  
**Cc:** Dabagh, Nadia <Nadia.Dabagh@wsp.com>; Papanicolaou, Nektarios (Picton) CAN <Nektarios.Papanicolaou@lehighhanson.com>  
**Subject:** RE: Presentation August 25, 2022

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Hi [REDACTED]

That is unfortunate – yes please send them here and I will relay to the rest of the team.

Thanks,  
Jamie

---

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**Cc:** [REDACTED] >  
**Subject:** Presentation August 25, 2022

### EXTERNAL EMAIL

Chat Box DOES NOT WORK. Are you receiving this email? Is this email the vehicle for sending questions re the presentation?

[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

## Dabagh, Nadia

---

**From:** [REDACTED] >  
**Sent:** August 25, 2022 7:10 PM  
**To:** LehighPictonALCF  
**Cc:** Dabagh, Nadia; Papanicolaou, Nektarios (Picton) CAN  
**Subject:** RE: Presentation August 25, 2022

How many of the guests are not able to use the Q&A function?

[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** Thursday, August 25, 2022 6:59 PM  
**To:** [REDACTED] >; LehighPictonALCF <LehighPictonALCF@golder.com>  
**Cc:** Dabagh, Nadia <Nadia.Dabagh@wsp.com>; Papanicolaou, Nektarios (Picton) CAN <Nektarios.Papanicolaou@lehighhanson.com>  
**Subject:** RE: Presentation August 25, 2022

NOTE: This email chain appears to contain email from outside Golder

I will speaking to the emissions very shortly – if you have more questions, please do not hesitate to share here.

---

**From:** [REDACTED] >  
**Sent:** August 25, 2022 6:52 PM  
**To:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Cc:** Dabagh, Nadia <[Nadia.Dabagh@wsp.com](mailto:Nadia.Dabagh@wsp.com)>; Papanicolaou, Nektarios (Picton) CAN <[Nektarios.Papanicolaou@lehighhanson.com](mailto:Nektarios.Papanicolaou@lehighhanson.com)>  
**Subject:** RE: Presentation August 25, 2022

### EXTERNAL EMAIL

I have a question regarding the process described. There was no mention of monitoring exhaust emissions, specifically, combusted plastics and other non-organic micromaterials?

[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
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**To:** [REDACTED] >; LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Cc:** Dabagh, Nadia <[Nadia.Dabagh@wsp.com](mailto:Nadia.Dabagh@wsp.com)>; Papanicolaou, Nektarios (Picton) CAN

<[Nektarios.Papanicolaou@lehighhanson.com](mailto:Nektarios.Papanicolaou@lehighhanson.com)>

**Subject:** RE: Presentation August 25, 2022

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Hi [REDACTED]

That is unfortunate – yes please send them here and I will relay to the rest of the team.

Thanks,  
Jamie

---

**From:** [REDACTED] >

**Sent:** August 25, 2022 6:45 PM

**To:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>

**Cc:** [REDACTED] >

**Subject:** Presentation August 25, 2022

#### EXTERNAL EMAIL

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[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

## Dabagh, Nadia

---

**From:** [REDACTED] >  
**Sent:** August 25, 2022 7:25 PM  
**To:** LehighPictonALCF  
**Cc:** Dabagh, Nadia; Papanicolaou, Nektarios (Picton) CAN  
**Subject:** RE: Presentation August 25, 2022

Will you be sending the participants copies of the presentation? There are many emissions related details that I would like to review further.

Thanks  
[REDACTED]

[REDACTED]

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** Thursday, August 25, 2022 6:59 PM  
**To:** [REDACTED] >; LehighPictonALCF <LehighPictonALCF@golder.com>  
**Cc:** Dabagh, Nadia <Nadia.Dabagh@wsp.com>; Papanicolaou, Nektarios (Picton) CAN <Nektarios.Papanicolaou@lehighhanson.com>  
**Subject:** RE: Presentation August 25, 2022

**NOTE:** This email chain appears to contain email from outside Golder

I will speaking to the emissions very shortly – if you have more questions, please do not hesitate to share here.

---

**From:** [REDACTED] >  
**Sent:** August 25, 2022 6:52 PM  
**To:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Cc:** Dabagh, Nadia <[Nadia.Dabagh@wsp.com](mailto:Nadia.Dabagh@wsp.com)>; Papanicolaou, Nektarios (Picton) CAN <[Nektarios.Papanicolaou@lehighhanson.com](mailto:Nektarios.Papanicolaou@lehighhanson.com)>  
**Subject:** RE: Presentation August 25, 2022

### EXTERNAL EMAIL

I have a question regarding the process described. There was no mention of monitoring exhaust emissions, specifically, combusted plastics and other non-organic micromaterials?

[REDACTED]

---

**From:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Sent:** Thursday, August 25, 2022 6:48 PM  
**To:** [REDACTED] >; LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>

**Cc:** Dabagh, Nadia <[Nadia.Dabagh@wsp.com](mailto:Nadia.Dabagh@wsp.com)>; Papanicolaou, Nektarios (Picton) CAN  
<[Nektarios.Papanicolaou@lehighhanson.com](mailto:Nektarios.Papanicolaou@lehighhanson.com)>

**Subject:** RE: Presentation August 25, 2022

NOTE: This email chain appears to contain email from outside Golder

Hi [REDACTED]

That is unfortunate – yes please send them here and I will relay to the rest of the team.

Thanks,  
Jamie

---

**From:** [REDACTED] >  
**Sent:** August 25, 2022 6:45 PM  
**To:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Cc:** [REDACTED] >  
**Subject:** Presentation August 25, 2022

**EXTERNAL EMAIL**

Chat Box DOES NOT WORK. Are you receiving this email? Is this email the vehicle for sending questions re the presentation?

[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

## Dabagh, Nadia

---

**From:** [REDACTED] >  
**Sent:** August 25, 2022 7:41 PM  
**To:** LehighPictonALCF  
**Cc:** Dabagh, Nadia; Papanicolaou, Nektarios (Picton) CAN  
**Subject:** RE: Presentation August 25, 2022

This is great news. Thank you  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** Thursday, August 25, 2022 7:27 PM  
**To:** [REDACTED] >; LehighPictonALCF <LehighPictonALCF@golder.com>  
**Cc:** Dabagh, Nadia <Nadia.Dabagh@wsp.com>; Papanicolaou, Nektarios (Picton) CAN <Nektarios.Papanicolaou@lehighhanson.com>  
**Subject:** RE: Presentation August 25, 2022

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Yes definitely – there will be a link on the website here within the next few days:

<http://lehighpictonalcf.ca/>

---

**From:** [REDACTED] >  
**Sent:** August 25, 2022 7:25 PM  
**To:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Cc:** Dabagh, Nadia <[Nadia.Dabagh@wsp.com](mailto:Nadia.Dabagh@wsp.com)>; Papanicolaou, Nektarios (Picton) CAN <[Nektarios.Papanicolaou@lehighhanson.com](mailto:Nektarios.Papanicolaou@lehighhanson.com)>  
**Subject:** RE: Presentation August 25, 2022

### EXTERNAL EMAIL

Will you be sending the participants copies of the presentation? There are many emissions related details that I would like to review further.

Thanks  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Sent:** Thursday, August 25, 2022 6:59 PM

**To:** [REDACTED] LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Cc:** Dabagh, Nadia <[Nadia.Dabagh@wsp.com](mailto:Nadia.Dabagh@wsp.com)>; Papanicolaou, Nektarios (Picton) CAN <[Nektarios.Papanicolaou@lehighhanson.com](mailto:Nektarios.Papanicolaou@lehighhanson.com)>  
**Subject:** RE: Presentation August 25, 2022

NOTE: This email chain appears to contain email from outside Golder

I will speaking to the emissions very shortly – if you have more questions, please do not hesitate to share here.

---

**From:** [REDACTED] >  
**Sent:** August 25, 2022 6:52 PM  
**To:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Cc:** Dabagh, Nadia <[Nadia.Dabagh@wsp.com](mailto:Nadia.Dabagh@wsp.com)>; Papanicolaou, Nektarios (Picton) CAN <[Nektarios.Papanicolaou@lehighhanson.com](mailto:Nektarios.Papanicolaou@lehighhanson.com)>  
**Subject:** RE: Presentation August 25, 2022

### EXTERNAL EMAIL

I have a question regarding the process described. There was no mention of monitoring exhaust emissions, specifically, combusted plastics and other non-organic micromaterials?

[REDACTED]  
[REDACTED]

---

**From:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Sent:** Thursday, August 25, 2022 6:48 PM  
**To:** [REDACTED] >; LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Cc:** Dabagh, Nadia <[Nadia.Dabagh@wsp.com](mailto:Nadia.Dabagh@wsp.com)>; Papanicolaou, Nektarios (Picton) CAN <[Nektarios.Papanicolaou@lehighhanson.com](mailto:Nektarios.Papanicolaou@lehighhanson.com)>  
**Subject:** RE: Presentation August 25, 2022

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Hi [REDACTED]

That is unfortunate – yes please send them here and I will relay to the rest of the team.

Thanks,  
Jamie

---

**From:** [REDACTED] >  
**Sent:** August 25, 2022 6:45 PM  
**To:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Cc:** [REDACTED] >  
**Subject:** Presentation August 25, 2022

## EXTERNAL EMAIL

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[REDACTED]

[REDACTED]

[REDACTED]



## Dabagh, Nadia

---

**From:** [REDACTED]  
**Sent:** August 27, 2022 9:51 AM  
**To:** Dabagh, Nadia  
**Subject:** Re: Public Meeting #2 - Alternative Low Carbon Fuel Use at the Lehigh Picton Plant

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hello

Is it possible to get a copy of the slides presented on the 25th?  
Thank you

[REDACTED]

On Friday, August 26, 2022 at 10:57:05 AM EDT, Dabagh, Nadia <nadia.dabagh@wsp.com> wrote:

Hi All,

The Project Team would like to extend a sincere thank you for attending our Public Meeting #2 last night and particularly for your patience regarding the technical issues experienced during the meeting. As such, we'd like to invite you to an open-house taking place at the Lehigh Picton Plant (1370 Hwy 49, Picton ON) on Wednesday, August 31, 2022 at 5 pm to discuss any questions you may have regarding Public Meeting #2 and/or the overall Project.

**Where:** Lehigh Picton Plant - 1370 Hwy 49, Picton ON (<https://goo.gl/maps/TpLJvnbbiANnusJ3A>)

**When:** Wednesday, August 31, 2022 at 5pm

If you have any questions, please let me know.

Kind regards,

Nadia



**Nadia Dabagh**  
*Environmental Planner, Consultation Lead*

On behalf of:



**Nick Papanicolaou**

Environmental Manager

Cell: (613) 438-0361

**Nadia Dabagh, she / her**

Environmental Planner

Earth & Environment

T+ 1 289-835-2519



610 Chartwell Road, Suite 300, Oakville, Canada L6J 2X6

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prière de le transférer au [conformitelcap@wsp.com](mailto:conformitelcap@wsp.com) afin que nous puissions rapidement traiter votre demande. Notez que ce ne sont pas tous les messages transmis par WSP qui constituent des messages électroniques commerciaux.

-LAEmHhHzdJzB(TWfa4Hgs7pbKl

## Dabagh, Nadia

---

**From:** [REDACTED]  
**Sent:** August 30, 2022 11:49 AM  
**To:** Dabagh, Nadia  
**Cc:** 'Papanicolaou, Nektarios (Picton) CAN'; 'LehighPictonALCF'  
**Subject:** RE: Public Meeting #2 - Alternative Low Carbon Fuel Use at the Lehigh Picton Plant

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Nadia:

I will NOT be able to attend on Wed 31-Aug-22, but here are the points I wished to raise, but was unable to at meeting #2:

First:  
WSP and Lehigh continually refer to the street address of the plant as Hwy 49, when in fact it is County Road 49. A road downloaded by the province to the County and for which the County is now facing a 20+ million dollar rebuild. A high volume of the all season heavy vehicle traffic is related to Lehigh's operations. So this plan will add more heavy vehicles to County Road 49.

Secondly:  
The equipment schematics and process overview both referenced on-site 'Rejected Materials'. What are you proposing to do with the 'Rejected Materials'?  
I ask, because I am concerned that industrial quantities of this 'Rejected Material' may end up in County operated Land Fills, which are not capable of handling it properly.

I was very disappointed that WSP effectively muzzled citizen questions and comments during your presentation. That to me, bodes ill for the implementation of this proposal.

Sincerely  
[REDACTED]

---

[REDACTED]

[REDACTED]

---

**From:** Dabagh, Nadia <Nadia.Dabagh@wsp.com>  
**Sent:** Friday, August 26, 2022 10:57  
**Cc:** Papanicolaou, Nektarios (Picton) CAN <Nektarios.Papanicolaou@lehighhanson.com>; LehighPictonALCF <LehighPictonALCF@golder.com>  
**Subject:** Public Meeting #2 - Alternative Low Carbon Fuel Use at the Lehigh Picton Plant

Hi All,

The Project Team would like to extend a sincere thank you for attending our Public Meeting #2 last night and particularly for your patience regarding the technical issues experienced during the meeting. As such, we'd like to invite you to an open-house taking place at the Lehigh Picton Plant (1370 Hwy 49, Picton ON) on Wednesday, August 31, 2022 at 5 pm to discuss any questions you may have regarding Public Meeting #2 and/or the overall Project.

**Where: Lehigh Picton Plant - 1370 Hwy 49, Picton ON** (<https://goo.gl/maps/TpLJvnbbiANnusJ3A>)

**When: Wednesday, August 31, 2022 at 5pm**

If you have any questions, please let me know.

Kind regards,  
Nadia



**Nadia Dabagh**  
*Environmental Planner, Consultation Lead*

On behalf of:



**Nick Papanicolaou**  
Environmental Manager  
Cell: (613) 438-0361

**Nadia Dabagh**, *she / her*  
Environmental Planner  
Earth & Environment

T+ 1 289-835-2519



610 Chartwell Road, Suite 300, Oakville, Canada L6J 2X6

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-LAEmHhHzdJzBITWfa4Hgs7pbKl

## Dabagh, Nadia

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** September 2, 2022 11:39 AM  
**To:** Dabagh, Nadia; Capstick, Sean; Papanicolaou, Nektarios (Picton) CAN  
**Subject:** FW: question from public meeting #2

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

NOTE: This email chain appears to contain email from outside Golder

FYI

---

**From:** [REDACTED]  
**Sent:** September 1, 2022 7:33 PM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Subject:** question from public meeting #2

### EXTERNAL EMAIL

Thanks for the public meeting presentation, both meetings have been informative & professionally run & I'm sorry I missed the open house at the plant. IMHO the technical issues in public meeting #2 likely stem from Microsoft Teams, which gives participants the option to download MS Teams \*OR\* join the meeting with their browser. I did the latter and neither the Q&A nor the chat functions worked for me.

Regarding the alternative fuels being considered: C&D may contain small amounts of non-recyclable plastics, IC&I may contain plastics & textiles, and RDF may contain tire fibre & fluff. I'm assuming these materials could be of concern because of possible increased VOCs or other emittants of concern. My questions are:

1) are there any generally recognized standards for what these alternative fuels may contain, or is that decided by the fuel producers?

2) The presentation stated that the fuels will be tested prior to unloading at the plant. Can you be more specific regarding what type of testing is being proposed for each of the fuels?

Thanks,

[REDACTED]

## Dabagh, Nadia

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** September 7, 2022 4:47 PM  
**To:** Dabagh, Nadia  
**Subject:** FW: Meeting

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

-----Original Message-----

**From:** [REDACTED] >  
**Sent:** September 7, 2022 10:19 AM  
**To:** Papanicolaou, Nektarios (Picton) CAN <Nektarios.Papanicolaou@lehighhanson.com>  
**Subject:** Meeting

This message has originated from an External Source. Please use proper judgment and caution when opening attachments, clicking links, or responding to this email.

Hi Nick

Was the latest zoom call about the lcf proposal recorded? If so could I have a link?

Cheers



Sent from my iPhone



## Dabagh, Nadia

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** September 12, 2022 10:28 AM  
**To:** Dabagh, Nadia  
**Subject:** FW: ALCF proposal and our concerns

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

[NOTE: This email chain appears to contain email from outside Golder](#)

FYI

---

**From:** [REDACTED] >  
**Sent:** September 12, 2022 9:39 AM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Subject:** ALCF proposal and our concerns

### EXTERNAL EMAIL

I assume I am past the date for expressing concerns as the website appears to have been taken down.

However, I do have 2 concerns that I would like addressed and responded to:

1. In calculating the supposed carbon decrease, have you included the emissions from the diesel trucks which will transport this stuff to the plant? During the May meeting I believe you stated that the only source of ALCF at that time was somewhere near Buffalo N.Y. which raises 2 questions. Those trucks would be travelling at least 400 kms and then returning another 400 kms empty—using average data for fuel consumption and the average carbon emission from Diesel engines I calculate that this would produce in excess of 6 million lbs of carbon per year ; have you included this in your calculations? The second issue is that these materials are being sourced from a jurisdiction which may have more lax standards regarding the contents of the ALCFs—how do you plan to address that?

2. More concerning is the question of what exactly the ALCF contains. There are fugitive emissions from your plant and, although they have decreased from the Italicimenti days, they still happen. You mentioned that materials from demolition would be a large part of the ALCFs—what assurance can you give your neighbours that there is no asbestos for example in the ALCFs; this is only one of a multitude of carcinogens that could be present but it is certainly present in demolition materials as it was widely used in asphalt shingles and in insulation until it was banned. The tort lawyers in the U.S.A. have had a field day with Mesothelioma and I would hate to think what might happen here if asbestos particles were discovered in fugitive emissions. My

feeling is that the contents of these trucks should be monitored on a daily basis to ensure that there is absolutely no chance of carcinogens being present in the ALCF. Who is responsible for monitoring the ALCFs?

In closing I have to state that I am a sceptic regarding this so-called “ Green “ proposal; Greenwashing has become a popular corporate strategy for decreasing costs and therefore increasing the bottom line. If that is the case here you should be upfront and acknowledge that fact.

Respectfully yours,

A solid black rectangular box used to redact the signature of the sender.

## Dabagh, Nadia

---

**From:** Paula Peel <paulapeelpec@yahoo.ca>  
**Sent:** September 12, 2022 7:06 AM  
**To:** Dabagh, Nadia  
**Cc:** Papanicolaou, Nektarios (Picton) CAN  
**Subject:** Questions Re: Public Meeting #2 - Alternative Low Carbon Fuel Use at the Lehigh Picton Plant

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Nadia,

Thank you for your message. Unfortunately the technical problems at the Aug 25 public meeting prevented me (and many other people) from asking their questions. As a result I still have a number of questions and am hoping that you would provide me with the contact information for the appropriate person in the project team who can hopefully answer them.

Regards,  
Paula Peel  
Director, Prince Edward County Field Naturalists (PECFN)

On Friday, August 26, 2022 at 10:57:04 a.m. EDT, Dabagh, Nadia <nadia.dabagh@wsp.com> wrote:

Hi All,

The Project Team would like to extend a sincere thank you for attending our Public Meeting #2 last night and particularly for your patience regarding the technical issues experienced during the meeting. As such, we'd like to invite you to an open-house taking place at the Lehigh Picton Plant (1370 Hwy 49, Picton ON) on Wednesday, August 31, 2022 at 5 pm to discuss any questions you may have regarding Public Meeting #2 and/or the overall Project.

**Where:** Lehigh Picton Plant - 1370 Hwy 49, Picton ON (<https://goo.gl/maps/TpLJvnbbiANnusJ3A>)

**When:** Wednesday, August 31, 2022 at 5pm

If you have any questions, please let me know.

Kind regards,

Nadia



**Nadia Dabagh**  
*Environmental Planner, Consultation Lead*

On behalf of:



**Nick Papanicolaou**

Environmental Manager

Cell: (613) 438-0361

**Nadia Dabagh, she / her**

Environmental Planner

Earth & Environment

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-LAEmHhHzdJzBITWfa4Hgs7pbKI

## Dabagh, Nadia

---

**From:** Francis M. Chua <francis@francischua.com>  
**Sent:** September 14, 2022 4:01 PM  
**To:** LehighPictonALCF  
**Cc:** Julie Kapyrka; Kaitlin Hill (Curve Lake) (KaitlinH@curvelake.ca); Kayla Wright; Dabagh, Nadia; Papanicolaou, Nektarios (Picton) CAN; jmcevoy@wsp.com; Capstick, Sean; Elliott, Cassandra  
**Subject:** Re: Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant  
**Attachments:** CLFN and Proponent Capacity Funding Agreement 2022 09 14.docx  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hello!

Thank you for meeting today. As discussed, we will schedule in our workflow a 'small' scale review of the documents provided. We will look into doing this in the December/January timeframe; perhaps earlier. I would project that when you answer the questions from that review, we could loop back in the February timeframe and bring some kind of 'closure' / 'no further issues or questions' to the file by the March timeframe.

Then we can use this first interaction as a way to develop an ongoing relationship with both Lehigh and those at WSP Golder. Attached is the agreement template that we use with other proponents. It can be applied to this project and for future projects.

Thank you for your time.

~ Francis

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** Thursday, August 25, 2022 1:21 PM  
**To:** Francis M. Chua <francis@francischua.com>; LehighPictonALCF <LehighPictonALCF@golder.com>  
**Cc:** Julie Kapyrka <JulieK@curvelake.ca>; Kaitlin Hill (Curve Lake) (KaitlinH@curvelake.ca) <KaitlinH@curvelake.ca>; Kayla Wright <kayla@francischua.com>; Dabagh, Nadia <Nadia.Dabagh@wsp.com>; Papanicolaou, Nektarios (Picton) CAN <Nektarios.Papanicolaou@lehighhanson.com>; jmcevoy@wsp.com <jmcevoy@wsp.com>; Capstick, Sean <Sean\_Capstick@golder.com>; Elliott, Cassandra <Cassandra\_Elliott@golder.com>  
**Subject:** RE: Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

**NOTE:** This email chain appears to contain email from outside Golder

We are unavailable that day – Are you available on Wed Sep 14<sup>th</sup> @ 3pm?

---

**From:** Francis M. Chua <francis@francischua.com>  
**Sent:** August 24, 2022 5:13 PM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Cc:** Julie Kapyrka <JulieK@curvelake.ca>; Kaitlin Hill (Curve Lake) (KaitlinH@curvelake.ca) <KaitlinH@curvelake.ca>; Kayla Wright <kayla@francischua.com>; Dabagh, Nadia <Nadia.Dabagh@wsp.com>; Papanicolaou, Nektarios (Picton)

CAN <Nektarios.Papanicolaou@lehighhanson.com>; jmcevoy@wsp.com; Capstick, Sean <Sean\_Capstick@golder.com>; Elliott, Cassandra <Cassandra\_Elliott@golder.com>

**Subject:** Re: Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

**EXTERNAL EMAIL**

Hi Jamie.

I will be away for a couple of weeks. Would September 12 after 1pm work for you and your team? If so, please send an invite.

Thanks.

Sincerely,  
Francis Chua  
Support to Curve Lake First Nation  
519-375-6749

---

**From:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>

**Sent:** Wednesday, August 24, 2022 3:39 PM

**To:** Francis M. Chua <[francis@francischua.com](mailto:francis@francischua.com)>; LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>

**Cc:** Julie Kapyrka <[JulieK@curvelake.ca](mailto:JulieK@curvelake.ca)>; Kaitlin Hill (Curve Lake) ([KaitlinH@curvelake.ca](mailto:KaitlinH@curvelake.ca)) <[KaitlinH@curvelake.ca](mailto:KaitlinH@curvelake.ca)>; Kayla Wright <[kayla@francischua.com](mailto:kayla@francischua.com)>; Dabagh, Nadia <[Nadia.Dabagh@wsp.com](mailto:Nadia.Dabagh@wsp.com)>; Papanicolaou, Nektarios (Picton) CAN <[Nektarios.Papanicolaou@lehighhanson.com](mailto:Nektarios.Papanicolaou@lehighhanson.com)>; jmcevoy@wsp.com <[jmcevoy@wsp.com](mailto:jmcevoy@wsp.com)>; Capstick, Sean <[Sean\\_Capstick@golder.com](mailto:Sean_Capstick@golder.com)>; Elliott, Cassandra <[Cassandra\\_Elliott@golder.com](mailto:Cassandra_Elliott@golder.com)>

**Subject:** RE: Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

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Hi Francis,

Does Thursday Sep 1<sup>st</sup>, 11 am to noon work for your team?

Thanks,  
Jamie

---

**From:** Francis M. Chua <[francis@francischua.com](mailto:francis@francischua.com)>

**Sent:** August 16, 2022 8:52 PM

**To:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>

**Cc:** Julie Kapyrka <[JulieK@curvelake.ca](mailto:JulieK@curvelake.ca)>; Kaitlin Hill (Curve Lake) ([KaitlinH@curvelake.ca](mailto:KaitlinH@curvelake.ca)) <[KaitlinH@curvelake.ca](mailto:KaitlinH@curvelake.ca)>; Kayla Wright <[kayla@francischua.com](mailto:kayla@francischua.com)>

**Subject:** Re: Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

**EXTERNAL EMAIL**

Hello to The Lehigh Hanson Project Team. Hello Jamie and Nick.

Thank you for your email below and thank you for your letter to Chief Whetung.

We are encouraged in particular to hear about working together to build a strong relationship between Curve Lake First Nation and Lehigh Hanson.

Myself and Kayla are supporting Curve Lake First Nation staff (Julie and Kaitlin) - all of whom are cc'd on this email. Please continue to correspond with Julie and Kaitlin. As long as you keep myself and Kayla in the loop we will continue to assist in this relationship building.

Our main goal is to obtain the information/documents/plans necessary to understand the project and assist with getting reviews done either by CLFN staff and/or supporting consultants. Part of this process is to determine if the project has set aside capacity funding to undertake these discussions and reviews.

If you have time this Friday for a meeting, please send me an invite. I am available from 12:30pm onward and we can have an initial discussion.

Thank you.

Sincerely,  
Francis Chua  
Support to Curve Lake First Nation  
519-375-6749

---

**From:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Sent:** June 10, 2022 8:40 AM  
**To:** Kaitlin Hill <[KaitlinH@curvelake.ca](mailto:KaitlinH@curvelake.ca)>; LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Cc:** Julie Kapyrka <[JulieK@curvelake.ca](mailto:JulieK@curvelake.ca)>  
**Subject:** RE: Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

**NOTE:** This email chain appears to contain email from outside Golder  
Good morning,

Please find attached our letter in response to your inquiry about the Low Carbon Fuel Project at Lehigh Picton.

We look forward to hearing from you.

Kind Regards,

The Lehigh Hanson Project Team



**Jamie McEvoy**  
*Senior Air Quality Engineer, Project Manager*

On behalf of:



**Nick Papanicolaou**  
Environmental Manager  
Cell: (613) 438-0361



---

**From:** Kaitlin Hill <[KaitlinH@curvelake.ca](mailto:KaitlinH@curvelake.ca)>

**Sent:** April 20, 2022 1:45 PM

**To:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>

**Cc:** Julie Kapyrka <[JulieK@curvelake.ca](mailto:JulieK@curvelake.ca)>

**Subject:** Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

**EXTERNAL EMAIL**

Good afternoon Nick,

Please find attached a letter from Curve Lake First Nation in regard to the proposed Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant.

We look forward to hearing from you.

Miigwech,  
Kaitlin H.



**Kaitlin Hill**  
**Lands and Resources Consultation Liaison**  
**Curve Lake First Nation**  
**Government Services Building**  
**22 Winookeeda Street, Curve Lake, ON K0L 1R0**  
**P: 705.657.8045 ext 222 F: 705.657.8708**  
**W: [www.curvelakefirstnation.ca](http://www.curvelakefirstnation.ca)**  
**E: [KaitlinH@curvelake.ca](mailto:KaitlinH@curvelake.ca)**

## Dabagh, Nadia

---

**From:** Barboza, Karla (MTCS) <Karla.Barboza@ontario.ca>  
**Sent:** September 26, 2022 4:00 PM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Cc:** Papanicolaou, Nektarios (Picton) CAN <Nektarios.Papanicolaou@lehighhanson.com>  
**Subject:** RE: MHSTCI Letter - ECA - Lehigh Picton Cement Plant

### EXTERNAL EMAIL

Hi Jamie,

My sincere apologies for not replying earlier! Please note that Jack Mallon is no longer with the ministry.

I've reviewed your response dated June 10, 2022 and have the following recommendations:

- Archaeological resources: please include the completed screening checklist *Criteria for Evaluating Archaeological Potential* documenting that the project area has been subject to recent extensive and intensive ground disturbance.  
If the proposed undertaking impacts water, please complete the *Criteria for Evaluating Marine Archaeological Potential* to determine whether a marine archaeological assessment is required.
- Built heritage resources and cultural heritage landscapes: Please complete the screening checklist *Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes*. Please check with the municipality (municipal heritage planner) if the property may have cultural heritage value.

Let me know if you have any other questions.

Regards,  
Karla

**Karla Barboza MCIP, RPP, CAHP** | (A) Team Lead, Heritage  
Ministry of Tourism, Culture and Sport  
Heritage, Tourism and Culture Division | Programs and Services Branch | Heritage Planning Unit  
T. 416. 660.1027 | Email: [karla.barboza@ontario.ca](mailto:karla.barboza@ontario.ca)

---

**From:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Sent:** July-15-22 1:55 PM  
**To:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>; Mallon, Jack (MHSTCI) <[Jack.Mallon@ontario.ca](mailto:Jack.Mallon@ontario.ca)>  
**Cc:** Barboza, Karla (MTCS) <[Karla.Barboza@ontario.ca](mailto:Karla.Barboza@ontario.ca)>; Papanicolaou, Nektarios (Picton) CAN <[Nektarios.Papanicolaou@lehighhanson.com](mailto:Nektarios.Papanicolaou@lehighhanson.com)>  
**Subject:** RE: MHSTCI Letter - ECA - Lehigh Picton Cement Plant

**CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.**

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Hi Jack,

Following up on this – have you had a chance to review our response?

Thanks,  
Jamie

---

**From:** LehighPictonALCF  
**Sent:** June 10, 2022 12:31 PM  
**To:** 'Mallon, Jack (MHSTCI)' <[Jack.Mallon@ontario.ca](mailto:Jack.Mallon@ontario.ca)>; LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Cc:** Barboza, Karla (MHSTCI) <[Karla.Barboza@ontario.ca](mailto:Karla.Barboza@ontario.ca)>  
**Subject:** RE: MHSTCI Letter - ECA - Lehigh Picton Cement Plant

Good morning Jack,

Please find attached Lehigh's response to your letter.

Any questions, please reach out.

Kind Regards,

The Lehigh Hanson Project Team



**Jamie McEvoy**  
*Senior Air Quality Engineer, Project Manager*

On behalf of:



**Nick Papanicolaou**  
Environmental Manager  
Cell: (613) 438-0361

---

**From:** Mallon, Jack (MHSTCI) <[Jack.Mallon@ontario.ca](mailto:Jack.Mallon@ontario.ca)>  
**Sent:** April 14, 2022 3:47 PM  
**To:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>

**Cc:** Barboza, Karla (MHSTCI) <[Karla.Barboza@ontario.ca](mailto:Karla.Barboza@ontario.ca)>

**Subject:** MHSTCI Letter - ECA - Lehigh Picton Cement Plant

**EXTERNAL EMAIL**

Good afternoon,

Please see attached MHSTCI's comments on the Lehigh Picton Cement Plant ECA.

Do not hesitate to contact me if you have any questions.

Regards,

**Jack Mallon**

Heritage Planner

Heritage Planning Unit | Programs and Services Branch

Heritage, Tourism and Culture Division

Ministry of Heritage, Sport, Tourism and Culture Industries

Phone: 437-522-6582

## Dabagh, Nadia

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** October 3, 2022 4:09 PM  
**To:** Francis M. Chua  
**Cc:** Julie Kapyrka; Kaitlin Hill (Curve Lake) (KaitlinH@curvelake.ca); LehighPictonALCF; Kayla Wright; Dabagh, Nadia; Papanicolaou, Nektarios (Picton) CAN; McEvoy, Jamie; Capstick, Sean; Elliott, Cassandra  
**Subject:** RE: Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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Hi Francis,

Thank you for taking the time to meet with our team. We appreciated your input and questions regarding the proposed Low Carbon Fuels Use at Lehigh Picton Cement Plant, and we are looking forward to developing a meaningful long-term relationship with Curve Lake First Nation. Before we agree to your review, we feel the best path forward to developing this relationship is to create a dialogue with your team and the Curve Lake leadership in the form of another meeting. We would like this meeting to be an opportunity for our team to address any remaining questions or concerns about the project.

We would be happy to provide capacity funding in the form of an honorarium for Curve Lake's participation in this meeting. We feel this would provide an opportunity for our team to provide more details about the project and address areas of interest or concern and assist in developing the Nation's understanding of the project and their environmental concerns, including the air emissions from the project.

We are happy to discuss this proposal in more detail.

Kind regards,

Lehigh ACLF Project Team



**Jamie McEvoy**  
*Senior Air Quality Engineer, Project Manager*



**Nick Papanicolaou**  
Environmental Manager  
Cell: (613) 438-0361

---

**From:** Francis M. Chua <francis@francischua.com>  
**Sent:** September 14, 2022 4:01 PM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Cc:** Julie Kapyrka <JulieK@curvelake.ca>; Kaitlin Hill (Curve Lake) (KaitlinH@curvelake.ca) <KaitlinH@curvelake.ca>;

Kayla Wright <kayla@francischua.com>; Dabagh, Nadia <Nadia.Dabagh@wsp.com>; Papanicolaou, Nektarios (Picton) CAN <Nektarios.Papanicolaou@lehighhanson.com>; jmcevoy@wsp.com; Capstick, Sean <Sean\_Capstick@golder.com>; Elliott, Cassandra <Cassandra\_Elliott@golder.com>

**Subject:** Re: Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

## EXTERNAL EMAIL

Hello!

Thank you for meeting today. As discussed, we will schedule in our workflow a 'small' scale review of the documents provided. We will look into doing this in the December/January timeframe; perhaps earlier. I would project that when you answer the questions from that review, we could loop back in the February timeframe and bring some kind of 'closure' / 'no further issues or questions' to the file by the March timeframe.

Then we can use this first interaction as a way to develop an ongoing relationship with both Lehigh and those at WSP Golder. Attached is the agreement template that we use with other proponents. It can be applied to this project and for future projects.

Thank you for your time.

~ Francis

---

**From:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>

**Sent:** Thursday, August 25, 2022 1:21 PM

**To:** Francis M. Chua <[francis@francischua.com](mailto:francis@francischua.com)>; LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>

**Cc:** Julie Kapyrka <[JulieK@curvelake.ca](mailto:JulieK@curvelake.ca)>; Kaitlin Hill (Curve Lake) (<[KaitlinH@curvelake.ca](mailto:KaitlinH@curvelake.ca)> <[KaitlinH@curvelake.ca](mailto:KaitlinH@curvelake.ca)>); Kayla Wright <[kayla@francischua.com](mailto:kayla@francischua.com)>; Dabagh, Nadia <[Nadia.Dabagh@wsp.com](mailto:Nadia.Dabagh@wsp.com)>; Papanicolaou, Nektarios (Picton) CAN <[Nektarios.Papanicolaou@lehighhanson.com](mailto:Nektarios.Papanicolaou@lehighhanson.com)>; jmcevoy@wsp.com <[jmcevoy@wsp.com](mailto:jmcevoy@wsp.com)>; Capstick, Sean <[Sean\\_Capstick@golder.com](mailto:Sean_Capstick@golder.com)>; Elliott, Cassandra <[Cassandra\\_Elliott@golder.com](mailto:Cassandra_Elliott@golder.com)>

**Subject:** RE: Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

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We are unavailable that day – Are you available on Wed Sep 14<sup>th</sup> @ 3pm?

---

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**Sent:** August 24, 2022 5:13 PM

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**Subject:** Re: Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

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Hi Jamie.

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Thanks.

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**Cc:** Julie Kapyrka <[JulieK@curvelake.ca](mailto:JulieK@curvelake.ca)>; Kaitlin Hill (Curve Lake) ([KaitlinH@curvelake.ca](mailto:KaitlinH@curvelake.ca)) <[KaitlinH@curvelake.ca](mailto:KaitlinH@curvelake.ca)>; Kayla Wright <[kayla@francischua.com](mailto:kayla@francischua.com)>; Dabagh, Nadia <[Nadia.Dabagh@wsp.com](mailto:Nadia.Dabagh@wsp.com)>; Papanicolaou, Nektarios (Picton) CAN <[Nektarios.Papanicolaou@lehighhanson.com](mailto:Nektarios.Papanicolaou@lehighhanson.com)>; [jmcevoy@wsp.com](mailto:jmcevoy@wsp.com) <[jmcevoy@wsp.com](mailto:jmcevoy@wsp.com)>; Capstick, Sean <[Sean\\_Capstick@golder.com](mailto:Sean_Capstick@golder.com)>; Elliott, Cassandra <[Cassandra\\_Elliott@golder.com](mailto:Cassandra_Elliott@golder.com)>  
**Subject:** RE: Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

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Hi Francis,

Does Thursday Sep 1<sup>st</sup>, 11 am to noon work for your team?

Thanks,  
Jamie

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**Cc:** Julie Kapyrka <[JulieK@curvelake.ca](mailto:JulieK@curvelake.ca)>; Kaitlin Hill (Curve Lake) ([KaitlinH@curvelake.ca](mailto:KaitlinH@curvelake.ca)) <[KaitlinH@curvelake.ca](mailto:KaitlinH@curvelake.ca)>; Kayla Wright <[kayla@francischua.com](mailto:kayla@francischua.com)>  
**Subject:** Re: Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

## EXTERNAL EMAIL

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Myself and Kayla are supporting Curve Lake First Nation staff (Julie and Kaitlin) - all of whom are cc'd on this email. Please continue to correspond with Julie and Kaitlin. As long as you keep myself and Kayla in the loop we will continue to assist in this relationship building.

Our main goal is to obtain the information/documents/plans necessary to understand the project and assist with getting reviews done either by CLFN staff and/or supporting consultants. Part of this process is to determine if the project has set aside capacity funding to undertake these discussions and reviews.

If you have time this Friday for a meeting, please send me an invite. I am available from 12:30pm onward and we can have an initial discussion.

Thank you.

Sincerely,  
Francis Chua  
Support to Curve Lake First Nation  
519-375-6749

---

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**Sent:** June 10, 2022 8:40 AM  
**To:** Kaitlin Hill <[KaitlinH@curvelake.ca](mailto:KaitlinH@curvelake.ca)>; LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Cc:** Julie Kapyrka <[JulieK@curvelake.ca](mailto:JulieK@curvelake.ca)>  
**Subject:** RE: Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

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Good morning,

Please find attached our letter in response to your inquiry about the Low Carbon Fuel Project at Lehigh Picton.

We look forward to hearing from you.

Kind Regards,

The Lehigh Hanson Project Team



**Jamie McEvoy**  
*Senior Air Quality Engineer, Project Manager*

On behalf of:



**Nick Papanicolaou**  
Environmental Manager  
Cell: (613) 438-0361



---

**From:** Kaitlin Hill <[KaitlinH@curvelake.ca](mailto:KaitlinH@curvelake.ca)>  
**Sent:** April 20, 2022 1:45 PM  
**To:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Cc:** Julie Kapyrka <[JulieK@curvelake.ca](mailto:JulieK@curvelake.ca)>  
**Subject:** Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant

## EXTERNAL EMAIL

Good afternoon Nick,

Please find attached a letter from Curve Lake First Nation in regard to the proposed Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant.

We look forward to hearing from you.

Miigwech,  
Kaitlin H.



**Kaitlin Hill**  
**Lands and Resources Consultation Liaison**  
**Curve Lake First Nation**  
**Government Services Building**  
**22 Winookeeda Street, Curve Lake, ON K0L 1R0**  
**P: 705.657.8045 ext 222 F: 705.657.8708**  
**W: [www.curvelakefirstnation.ca](http://www.curvelakefirstnation.ca)**  
**E: [KaitlinH@curvelake.ca](mailto:KaitlinH@curvelake.ca)**

## Dabagh, Nadia

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** October 6, 2022 12:54 PM  
**To:** [REDACTED]  
**Cc:** Papanicolaou, Nektarios (Picton) CAN  
**Subject:** RE: ALCF proposal and our concerns

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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Hi [REDACTED],

Thank you again for taking the time to provide detailed questions and comments on the project. The project has summarized our responses below for your consideration:

### Response to Q1:

Public Meeting #2 provided the proposed fuel suppliers and locations. Ideally these locations will be as close to the plant as possible to minimize transportation GHGs and costs. The purpose of O. Reg. 79/15 is to reduce the use of coal and petcoke by using lower carbon intensive fuels. It is also important to note that a full upstream and downstream greenhouse gas (GHG) assessment is outside the scope of this Project and has not been completed. However, assuming the transportation of fuels is a net addition of carbon emissions does not consider the fuel lifecycle of coal and the proposed ALCFs:

1. The main source of fuel is shipped via boat. There are significant GHGs from the extraction and shipping of this high carbon fuel.
2. The material that Lehigh is proposing to use would end up in a landfill where a significant portion (~50% of the carbon) that is in the materials would be released as methane versus carbon dioxide if it was not combusted as a fuel in a cement kiln. Methane is 25 times worse of a GHG than carbon dioxide on a mass basis.

It is also important to note that this is one step of several that Lehigh is proposing to do to reduce their carbon footprint and emissions.

### Response to Q2:

Fugitive emissions from the current facility are managed through the dust best management practice plans (BMPP). This is a living document and is updated as better management practices develop.

Asbestos is a hazardous waste and is disposed of differently than construction and demolition. This material is not eligible to be disposed of at the material recyclers providing the ALCF material to Lehigh. For monitoring of the trucks, Lehigh has developed a detailed fuel and handling and testing procedure, and the unloading of the trucks will be visually inspected by an operator in the ALCF receiving and storage building or through a camera in the control room.

We understand your concerns with greenwashing; however, O. Reg. 79/15 prescribes the acceptable use of ALCFs in Ontario. This ALCF permit application is consistent with the requirements of O. Reg. 79/15 whereby a reduction in GHG emissions from the Plant will be achieved with less reliance on fossil fuels (i.e., petcoke and coal). This is an excellent first step for the cement industry in Ontario to reduce its GHGs and represents one strategy in aiming for net zero

emissions. As mentioned above, these ALCFs are non-recyclable materials that would be destined for a landfill where there GHG potential would be significant higher if they were to degrade in a landfill with no energy recovery versus in a cement kiln that results in lower GHGs and useful heat.

Kind Regards,

The Lehigh Hanson Project Team



**Jamie McEvoy**  
Senior Air Quality Engineer, Project Manager



**Nick Papanicolaou**  
Environmental Manager  
Cell: (613) 438-0361

---

**From:** LehighPictonALCF

**Sent:** September 12, 2022 10:27 AM

**To:** [REDACTED] LehighPictonALCF <LehighPictonALCF@golder.com>

**Cc:** Papanicolaou, Nektarios (Picton) CAN <Nektarios.Papanicolaou@lehighhanson.com>

**Subject:** RE: ALCF proposal and our concerns

Hi [REDACTED],

Thank you for providing your questions and comments on the ALCF project. You can find a link here to the website and will remain active for quite some time: <https://www.lehighpictonalcf.ca/>. If you were not able to attend the second meeting, you can find the slides here as well:

[https://www.lehighpictonalcf.ca/documents/Lehigh%20Public%20Meeting%20%20Presentation\\_Final.pdf](https://www.lehighpictonalcf.ca/documents/Lehigh%20Public%20Meeting%20%20Presentation_Final.pdf)

We will make sure to respond to your question as soon as we can.

Thanks,



**Jamie McEvoy**  
Senior Air Quality Engineer, Project Manager

On behalf of:



**Nick Papanicolaou**  
Environmental Manager  
Cell: (613) 438-0361

---

**From:** [REDACTED]

**Sent:** September 12, 2022 9:39 AM

To: LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>

Subject: ALCF proposal and our concerns

## EXTERNAL EMAIL

I assume I am past the date for expressing concerns as the website appears to have been taken down.

However, I do have 2 concerns that I would like addressed and responded to:

1. In calculating the supposed carbon decrease, have you included the emissions from the diesel trucks which will transport this stuff to the plant? During the May meeting I believe you stated that the only source of ALCF at that time was somewhere near Buffalo N.Y. which raises 2 questions. Those trucks would be travelling at least 400 kms and then returning another 400 kms empty—using average data for fuel consumption and the average carbon emission from Diesel engines I calculate that this would produce in excess of 6 million lbs of carbon per year ; have you included this in your calculations? The second issue is that these materials are being sourced from a jurisdiction which may have more lax standards regarding the contents of the ALCFs—how do you plan to address that?

2. More concerning is the question of what exactly the ALCF contains. There are fugitive emissions from your plant and, although they have decreased from the Italicimenti days, they still happen. You mentioned that materials from demolition would be a large part of the ALCFs—what assurance can you give your neighbours that there is no asbestos for example in the ALCFs; this is only one of a multitude of carcinogens that could be present but it is certainly present in demolition materials as it was widely used in asphalt shingles and in insulation until it was banned. The tort lawyers in the U.S.A. have had a field day with Mesothelioma and I would hate to think what might happen here if asbestos particles were discovered in fugitive emissions. My feeling is that the contents of these trucks should be monitored on a daily basis to ensure that there is absolutely no chance of carcinogens being present in the ALCF. Who is responsible for monitoring the ALCFs?

In closing I have to state that I am a sceptic regarding this so-called “ Green “ proposal; Greenwashing has become a popular corporate strategy for decreasing costs and therefore increasing the bottom line. If that is the case here you should be upfront and acknowledge that fact.

Respectfully yours,



## Dabagh, Nadia

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** October 6, 2022 12:41 PM  
**To:** [REDACTED]; LehighPictonALCF  
**Subject:** RE: Questions for meeting #2

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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Hi [REDACTED],

Please see below for a response to your questions and concerns. Please do not hesitate to reach out if you have additional comments.

1. Why are you not undertaking a Demonstration Project for three years that will test the project, sort out any issues and report back to the public on the results?

O.Reg. 79/15 describes a pathway to permitting for a demonstration project as well as a non-demonstration project. The demonstration project pathway considers utilizing Alternative Low Carbon Fuels (ALCFs) for up to 90 days in a 12-month period for each of the 3 years. Lehigh Hanson Materials Limited, part of the HeidelbergCement Group, has many ALCF systems in operations worldwide gaining valuable knowledge and experience in executing a safe and compliant ALCF system. Both the demonstration and non-demonstration pathway require compliance to emission standards be met. Public Meeting #2 described how the ALCF emissions were assessed and how stack testing upon utilization of the ALCFs will provide the same level of assurance as a demonstration project would.

2. What are your sources of the kiln dried RDFs you propose to burn? How much trucking is involved? What will be the Carbon Footprint of these steps prior to arrival at the plant?

Refuse Derived Fuel (RDF) processing in Ontario is still developing. As you noted, the supply chain would have to be within close proximity to the facility to make it both economical from a trucking cost perspective and have a lower overall carbon footprint. RDF sampling from various sites in southern Ontario have been used to conduct laboratory analysis on the potential feedstock. This was further described during Public Meeting #2.

3. What scrubbing processes do you propose to use to take out any sulphur and nitrous oxides prior to letting waste gases into the environment. The RDFs burnt in the kiln release sulphur dioxides and nitrogen dioxides as the waste gases cool at the top of the kiln. Scrubbers had to be installed at the St. Mary's plant in Bowmanville after their Demonstration Project. Do you have such scrubbers at the Picton plant?

The Picton Plant utilizes a hydrated lime injection system for SO<sub>2</sub> abatement along with a modified quarry plan to reduce sulphur inputs. Additionally, Lehigh utilizes an Aqua Ammonia injection system for Selective Non-Catalytic Reduction (SNCR) of NO<sub>x</sub>. Lehigh and the St. Mary's Bowmanville site would have the same compliance limits irrespective of the methodology for emission reduction. Public Meeting #2 described the emission assessment with ALCFs and the impact to SO<sub>2</sub> / NO<sub>x</sub> emissions from ALCFs.

Kind Regards,

The Lehigh Hanson Project Team



**Nick Papanicolaou**  
Environmental Manager  
Cell: (613) 438-0361

-----Original Message-----

From: [REDACTED] >  
Sent: August 21, 2022 2:02 PM  
To: LehighPictonALCF <LehighPictonALCF@golder.com>  
Subject: Questions for meeting #2

EXTERNAL EMAIL

I am registered for the meeting on the 25th but have a few questions for you:

1. Why are you not undertaking a Demonstration Project for three years that will test the project, sort out any issues and report back to the public on the results?
2. What are your sources of the the kiln dried RDF's you propose to burn? How much trucking is involved? What will be the Carbon Footprint of these steps prior to arrival at the plant?
3. What scrubbing processes do you propose to use to take out any Sulphur and Nitrous oxides prior to letting waste gases into the environment. The RDF's burnt in the kiln release Sulphur dioxides and Nitrogen dioxides as the waste gases cool at the top of the kiln.  
Scrubbers had to be installed at the St. Mary's plant in Bowmanville after their Demonstration Project. Do you have such scrubbers at the Picton plant?

Submitted by

[REDACTED]

## Dabagh, Nadia

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** October 6, 2022 12:54 PM  
**To:** [REDACTED]  
**Cc:** LehighPictonALCF  
**Subject:** RE: question from public meeting #2

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

NOTE: This email chain appears to contain email from outside Golder

Hi [REDACTED],

Thank you for details questions and comments on the project. Please see below for our responses to your questions, and please do not hesitate to reach out if you have any addition concerns.

1) are there any generally recognized standards for what these alternative fuels may contain, or is that decided by the fuel producers?

O. Reg. 79/15 is explicit in what fuels are not acceptable and they must meet the following:

- Is not derived from or composed of any material set out in Schedule 1 of O. Reg. 79/15 (The schedule of ineligible fuels)
- Is wholly derived from or composed of materials that are biomass or municipal waste or a combination of both
- Has a high heat value of at least 10,000 megajoules per tonne (unless a fuel is wholly derived from or composed of materials that are solid biomass).

Additionally, any trace contaminants that may be present in the fuels must be assessed in the Emission Summary and Dispersion Modelling Report which must show compliance with the MECP air limits at offsite locations for the emission from the Plant. The MECP air limits are protective of human health and the environment.

2) The presentation stated that the fuels will be tested prior to unloading at the plant. Can you be more specific regarding what type of testing is being proposed for each of the fuels?

Lehigh has developed a fuel handling and receiving protocol. The following is a summary of what is included in this manual:

- Background, including a site description and proposed storage and handling equipment
- Handling procedures for ALCFs, and including incoming and outgoing records
- Material acceptance and vendor screening process
- ALCF sampling and testing, and steps taken upon identification of deficiencies

The sampling and testing will be completed to ensure the material assessed is included in the ESDM Report, satisfies O. Reg 79/15 and plant operating parameters (i.e., environmental, operational and carbon testing).

Kind Regards,

The Lehigh Hanson Project Team



**Nick Papanicolaou**  
Environmental Manager  
Cell: (613) 438-0361

---

**From:** [REDACTED]  
**Sent:** September 1, 2022 7:33 PM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Subject:** question from public meeting #2

#### EXTERNAL EMAIL

Thanks for the public meeting presentation, both meetings have been informative & professionally run & I'm sorry I missed the open house at the plant. IMHO the technical issues in public meeting #2 likely stem from Microsoft Teams, which gives participants the option to download MS Teams \*OR\* join the meeting with their browser. I did the latter and neither the Q&A nor the chat functions worked for me.

Regarding the alternative fuels being considered: C&D may contain small amounts of non-recyclable plastics, IC&I may contain plastics & textiles, and RDF may contain tire fibre & fluff. I'm assuming these materials could be of concern because of possible increased VOCs or other emittants of concern. My questions are:

- 1) are there any generally recognized standards for what these alternative fuels may contain, or is that decided by the fuel producers?
  
- 2) The presentation stated that the fuels will be tested prior to unloading at the plant. Can you be more specific regarding what type of testing is being proposed for each of the fuels?

Thanks,

[REDACTED]



## Dabagh, Nadia

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** October 6, 2022 12:46 PM  
**To:** [REDACTED]  
**Cc:** 'Papanicolaou, Nektarios (Picton) CAN'; LehighPictonALCF; Dabagh, Nadia  
**Subject:** RE: Public Meeting #2 - Alternative Low Carbon Fuel Use at the Lehigh Picton Plant

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

NOTE: This email chain appears to contain email from outside Golder

Hi [REDACTED],

Thank you for details questions and comments on the project. Please see below for our responses to your questions, and please do not hesitate to reach out if you have an addition concerns.

First:

WSP and Lehigh continually refer to the street address of the plant as Hwy 49, when in fact it is County Road 49.

The mailing address for the Picton Lehigh Cement plant is listed as 1370 HWY 49.

A road downloaded by the province to the County and for which the County is now facing a 20+ million dollar rebuild. A high volume of the all season heavy vehicle traffic is related to Lehigh's operations. So this plan will add more heavy vehicles to County Road 49.

While Lehigh's operations contribute to heavy vehicle traffic. The Ontario Aggregate Resources Corporation (TOARC) fees are applied to each metric tonnes (mt) of limestone from the quarry used in the manufacturing of cement. The Lehigh quarry operates north of Hwy 49 and a tunnel passes under Hwy 49 such that no aggregate from the quarry travels via public roadway. 70% of the product from Lehigh's facility is transported via marine transport. Therefore, despite the increase in road traffic, this increase is marginal in comparison to the fees levied. The TOARC fees are proportioned to the local municipality and the crown accordingly to be allocated as needed. TOARC fees are in addition to the property tax and marine transport fees.

Secondly:

The equipment schematics and process overview both referenced on-site 'Rejected Materials'. What are you proposing to do with the 'Rejected Materials'?

The rejected materials would be either metals which would be recycled, or oversized material which would be anticipated to be less than 1% of the delivered material. Lehigh will seek to return this material to the supplier.

I ask, because I am concerned that industrial quantities of this 'Rejected Material' may end up in County operated Land Fills, which are not capable of handling it properly.

These materials are currently destined for landfill and as such, with the use of ALCFs a 99% reduction of the total landfilled material would be achieved, and as mentioned above, Lehigh will be investigating returning unacceptable material to the supplier.

Additionally, Lehigh is in communication with Prince Edward County to explore opportunities with the County such that Lehigh assists with landfill diversion by using ALCFs at the Picton Plant.

I was very disappointed that WSP effectively muzzled citizen questions and comments during your presentation. That to me, bodes ill for the implementation of this proposal.

Lehigh / WSP understood that some Public Meeting #2 attendees unfortunately had technical difficulties, while others were able to use the chat / comment feature adequately. Those who were unable to use the chat / comment feature during the presentation were encouraged to provide their questions / comments via email to the Project Team. All questions received via email were raised and answered during Public Meeting #2. Lehigh also provided public access to view the Public Meeting #2 presentation live in a boardroom at the Picton Plant for anyone not able to connect virtually. Additionally, following Public Meeting #2, an open house invitation was issued to all attendees of Public Meeting #2 to come to the Picton Plant on August 31<sup>st</sup>, 2022 to ensure all questions / comments could be received and captured, and to address any accessibility requirements of Public Meeting #2 attendees.

Kind Regards,



**Jamie McEvoy**  
Senior Air Quality Engineer, Project Manager



**Nick Papanicolaou**  
Environmental Manager  
Cell: (613) 438-0361

---

**From:** [REDACTED]  
**Sent:** August 30, 2022 11:49 AM  
**To:** Dabagh, Nadia <Nadia.Dabagh@wsp.com>  
**Cc:** 'Papanicolaou, Nektarios (Picton) CAN' <Nektarios.Papanicolaou@lehighhanson.com>; LehighPictonALCF <LehighPictonALCF@golder.com>  
**Subject:** RE: Public Meeting #2 - Alternative Low Carbon Fuel Use at the Lehigh Picton Plant

**EXTERNAL EMAIL**

Nadia:

I will NOT be able to attend on Wed 31-Aug-22, but here are the points I wished to raise, but was unable to at meeting #2:

First:

WSP and Lehigh continually refer to the street address of the plant as Hwy 49, when in fact it is County Road 49. A road downloaded by the province to the County and for which the County is now facing a 20+ million dollar rebuild. A high volume of the all season heavy vehicle traffic is related to Lehigh's operations. So this plan will add more heavy vehicles to County Road 49.

Secondly:

The equipment schematics and process overview both referenced on-site 'Rejected Materials'. What are you proposing to do with the 'Rejected Materials'? I ask, because I am concerned that industrial quantities of this 'Rejected Material' may end up in County operated Land Fills, which are not capable of handling it properly.

I was very disappointed that WSP effectively muzzled citizen questions and comments during your presentation. That to me, bodes ill for the implementation of this proposal.

Sincerely

[REDACTED]

---

[REDACTED]

[REDACTED]

**From:** Dabagh, Nadia <[Nadia.Dabagh@wsp.com](mailto:Nadia.Dabagh@wsp.com)>

**Sent:** Friday, August 26, 2022 10:57

**Cc:** Papanicolaou, Nektarios (Picton) CAN <[Nektarios.Papanicolaou@lehighhanson.com](mailto:Nektarios.Papanicolaou@lehighhanson.com)>; LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>

**Subject:** Public Meeting #2 - Alternative Low Carbon Fuel Use at the Lehigh Picton Plant

Hi All,

The Project Team would like to extend a sincere thank you for attending our Public Meeting #2 last night and particularly for your patience regarding the technical issues experienced during the meeting. As such, we'd like to invite you to an open-house taking place at the Lehigh Picton Plant (1370 Hwy 49, Picton ON) on Wednesday, August 31, 2022 at 5 pm to discuss any questions you may have regarding Public Meeting #2 and/or the overall Project.

**Where:** Lehigh Picton Plant - 1370 Hwy 49, Picton ON (<https://goo.gl/maps/TpLJvnbbiANnusJ3A>)

**When:** Wednesday, August 31, 2022 at 5pm

If you have any questions, please let me know.

Kind regards,  
Nadia



**Nadia Dabagh**  
*Environmental Planner, Consultation Lead*

On behalf of:



**Nick Papanicolaou**  
Environmental Manager

Cell: (613) 438-0361

**Nadia Dabagh**, she / her  
Environmental Planner  
Earth & Environment

T+ 1 289-835-2519



610 Chartwell Road, Suite 300, Oakville, Canada L6J 2X6

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-LAEmHhHzdJzBITWfa4Hgs7pbKI

**Dabagh, Nadia**

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**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** October 6, 2022 12:37 PM  
**To:** [REDACTED]  
**Cc:** LehighPictonALCF  
**Subject:** RE: Alternative Low Carbon Fuel

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

NOTE: This email chain appears to contain email from outside Golder

Hi [REDACTED],

Thank you for your interest and support for the Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant.

Please be advised that we have added you to the Project's contact list and you will be notified of future consultation opportunities by email including the Notice of Completion of the Consultation Report for public review.

Should you require any additional information regarding this project, please visit the project website at [www.lehighpictonalcfc.ca](http://www.lehighpictonalcfc.ca) or feel free to contact the Project Team at [LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com).

Kind Regards,

The Lehigh Hanson Project Team



**Jamie McEvoy**  
*Senior Air Quality Engineer, Project Manager*



**Nick Papanicolaou**  
Environmental Manager  
Cell: (613) 438-0361

-----Original Message-----

**From:** [REDACTED]  
**Sent:** August 6, 2022 10:13 AM  
**To:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Subject:** Alternative Low Carbon Fuel

EXTERNAL EMAIL

Great idea - anyone opposing this initiative is not aware of what goes on in cement production, ALCF is needed. Congratulations on the initiative, it's a shame IMO that you have to go through a lengthy and potentially risky consultation when it should be self evident that ALCF helps solve two problems - use less coke while reducing landfill

Regards,

[REDACTED]

**Ministry of Heritage, Sport,  
Tourism and Culture Industries**

Programs and Services Branch  
400 University Ave, 5<sup>th</sup> Flr  
Toronto, ON M7A 2R9  
Tel: 437.522.6582

**Ministère des Industries du Patrimoine,  
du Sport, du Tourisme et de la Culture**

Direction des programmes et des services  
400, av. University, 5e étage  
Toronto, ON M7A 2R9  
Tél: 437.239.3404



January 26, 2021

EMAIL ONLY

Nick Papanicolaou  
Lehigh Hanson Materials Limited, Picton Plant  
Environmental Manager, Canada  
Phone: 613-438-0361  
LehighPictonALCF@golder.com

**MHSTCI File :** 0016258  
**Proponent :** Lehigh Hanson Materials Limited  
**Subject :** Notice of Intention to Apply under Ontario Regulation 79/15  
**Project :** Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant  
**Location :** Picton, Ontario

Dear Nick Papanicolaou:

Thank you for providing the Ministry of Heritage, Sport, Tourism and Culture Industries (MHSTCI) with the Notice of Intent to Apply for the above-referenced project. MHSTCI's interest in this Environmental Compliance Approval project relates to its mandate of conserving Ontario's cultural heritage, which includes:

- archaeological resources, including land and marine;
- built heritage resources, including bridges and monuments; and
- cultural heritage landscapes.

Under the ECA process, the proponent is required to determine a project's potential impact on known (previously recognized) and potential cultural heritage resources.

### **Project Summary**

Lehigh Hanson Materials Ltd. (Lehigh), a part of Heidelberg Cement, is undertaking efforts to use Alternative Low Carbon Fuels (ALCFs) to supplement the energy required to make Portland Cement at their Picton Cement Plant (the Site). ALCFs are in use in many cement plants all over the world and represent a state-of-the-art technology to reduce greenhouse gas emissions. The use of ALCFs is a key component of Heidelberg Cement's global carbon reduction strategy and diverts non-recyclable materials from landfills. The Site is located at 1370 Hwy 49, Picton Ontario.

### **Identifying Cultural Heritage Resources**

While some cultural heritage resources may have already been formally identified, others may be identified through screening and evaluation.

### **Archaeological Resources**

This ECA project may impact archaeological resources and should be screened using the MHSTCI [Criteria for Evaluating Archaeological Potential](#) and [Criteria for Evaluating Marine](#)



[Archaeological Potential](#) to determine if an archaeological assessment is needed. MHSTCI archaeological sites data are available at [archaeology@ontario.ca](mailto:archaeology@ontario.ca).

If the EA project area exhibits archaeological potential, then an archaeological assessment (AA) should be undertaken by an archaeologist licenced under the *Ontario Heritage Act (OHA)*, who is responsible for submitting the report directly to MHSTCI for review.

### **Built Heritage Resources and Cultural Heritage Landscapes**

A Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment will be undertaken for the entire study area during the planning phase and will be summarized in the ECA Report. This study will:

1. Describe the existing baseline cultural heritage conditions within the study area by identifying all known or potential built heritage resources and cultural heritage landscapes, including a historical summary of the study area. MHSTCI has developed screening criteria that may assist with this exercise: [Criteria for Evaluating for Potential Built Heritage Resources and Cultural Heritage Landscapes](#).
2. Identify preliminary potential project-specific impacts on the known and potential built heritage resources and cultural heritage landscapes that have been identified. The report should include a description of the anticipated impact to each known or potential built heritage resource or cultural heritage landscape that has been identified.
3. Recommend measures to avoid or mitigate potential negative impacts to known or potential built heritage resources and cultural heritage landscapes. The proposed mitigation measures are to inform the next steps of project planning and design.

Given that this project covers a large study area, MHSTCI recommends that the Cultural Heritage Report is carried out so that step 1 described above is undertaken early in the planning process. Then, steps 2 and 3 can be undertaken once the preferred alternatives have been selected.

Cultural Heritage Reports will be undertaken by a qualified person who has expertise, recent experience, and knowledge relevant to the type of cultural heritage resources being considered and the nature of the activity being proposed.

Community input should be sought to identify locally recognized and potential cultural heritage resources. Sources include, but are not limited to, municipal heritage committees, historical societies and other local heritage organizations.

Cultural heritage resources are often of critical importance to Indigenous communities. Indigenous communities may have knowledge that can contribute to the identification of cultural heritage resources, and we suggest that any engagement with Indigenous communities includes a discussion about known or potential cultural heritage resources that are of value to them.

### **Environmental Assessment Reporting**

All technical cultural heritage studies and their recommendations are to be addressed and incorporated into ECA projects. Please advise MHSTCI whether any technical cultural heritage studies will be completed for this ECA project, and provide them to MHSTCI before issuing a Notice of Completion or commencing any work on the site. If screening has identified no known

or potential cultural heritage resources, or no impacts to these resources, please include the completed checklists and supporting documentation in the ECA report or file.

Thank you for consulting MHSTCI on this project and please continue to do so throughout the ECA process. If you have any questions or require clarification, please do not hesitate to contact me.

Sincerely,

Jack Mallon  
Heritage Planner  
Jack.mallon@Ontario.ca

Copied to:

Karla Barboza, Team Lead, Heritage Planning Unit, MHSTCI – [karla.barboza@ontario.ca](mailto:karla.barboza@ontario.ca)

It is the sole responsibility of proponents to ensure that any information and documentation submitted as part of their EA report or file is accurate. MHSTCI makes no representation or warranty as to the completeness, accuracy or quality of the any checklists, reports or supporting documentation submitted as part of the EA process, and in no way shall MHSTCI be liable for any harm, damages, costs, expenses, losses, claims or actions that may result if any checklists, reports or supporting documents are discovered to be inaccurate, incomplete, misleading or fraudulent.

Please notify MHSTCI (at [archaeology@ontario.ca](mailto:archaeology@ontario.ca)) if archaeological resources are impacted by EA project work. All activities impacting archaeological resources must cease immediately, and a licensed archaeologist is required to carry out an archaeological assessment in accordance with the Ontario Heritage Act and the Standards and Guidelines for Consultant Archaeologists.

If human remains are encountered, all activities must cease immediately, and the local police and coroner must be contacted. In situations where human remains are associated with archaeological resources, MHSTCI should also be notified (at [archaeology@ontario.ca](mailto:archaeology@ontario.ca)) to ensure that the site is not subject to unlicensed alterations which would be a contravention of the Ontario Heritage Act.

# Government of Ontario: Ministry of Tourism and Culture

Programs & Services Branch  
401 Bay Street, Suite 1700  
Toronto ON M7A 0A7

## Criteria for Evaluating Archaeological Potential

### A Checklist for the Non-Specialist

“Archaeological potential” is a term used to describe the likelihood that a property contains archaeological resources. This checklist is intended to assist non-specialists screening for the archaeological potential of a property where site alteration is proposed.

Note: for projects seeking a Renewable Energy Approval under Ontario Regulation 359/09, the Ministry of Tourism and Culture has developed a separate checklist to address the requirements of that regulation.

Project Name	Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant
Project Location	Lehigh Cement Plant, Picton ON (1370 Highway 49 Picton)
Proponent Name	Nick Papanicolau
Proponent Contact Information	Nektarios.Papanicolau@leighhanson.com

### Known Archaeological Sites

1. Known archaeological sites within 300 m of property

☒ Yes ☐ Unknown ☐ No

Borden Number	Site Name	Time Period	Affinity	Site Type
BaGg-16	Lake Ontario Cement	Archaic	Aboriginal	Othercamp/campsite

In 1983 2 scrapers and 1 projectile point were recovered at the foot of a hill by a stream that would have flowed into Picton Bay. Site is located W of Highway 49 and adjacent to roadside, 700 m s of what, at the time was called “Lake Ontario Cement Plant”. Easting: 329300 Northing: 4879500 Projection/Datum: UTM18 NAD 27 LOT 13 AND CON 1 SOUTH WEST OF GREEN POINT

## Known Archaeological Sites

2. Body of water within 300 m of property If yes, what kind of water? 2. Body of water within 300 m of property If yes, what kind of water? a) Primary water source (lake, river, large creek, etc.) - The Lehigh Cement Plant is within 300m of an inlet of Lake Ontario, which contributes to the Archaeological Potential of the Study Area.

☒ Yes ☐ Unknown ☐ No

3. Topographical features on property (knolls, drumlins, eskers, or plateaus)

☐ Yes ☐ Unknown ☒ No

4. Pockets of sandy soil (50 m<sup>2</sup> or larger) in a clay or rocky area on property

☐ Yes ☐ Unknown ☒ No

5. Distinctive land formations on property (mounds, caverns, waterfalls, peninsulas, etc)

☐ Yes ☐ Unknown ☒ No

## Cultural Features

6. Known burial site or cemetery on or adjacent to the property (cemetery is registered with the Cemeteries Regulation Unit)

☐ Yes ☐ Unknown ☒ No

7. Food or scarce resource harvest areas on property (traditional fishing locations, agricultural/berry extraction areas, etc.)

☐ Yes ☒ Unknown ☐ No

8. Indications of early Euro-Canadian settlement within 300 m of property (monuments, cemeteries, structures, etc)

☐ Yes ☐ Unknown ☒ No

9. Early historic transportation routes within 100 m of property (historic road, trail, portage, rail corridor, etc.)

☒ Yes ☐ Unknown ☐ No

### Property-specific Information

10. Property is designated and/or listed under the *Ontario Heritage Act* (municipal register and lands described in Reg. 875 of the *Ontario Heritage Act*)

☐ Yes ☐ Unknown ☒ No

11. Local knowledge of archaeological potential of property (from aboriginal communities, heritage organisations, municipal heritage committees, etc.)

☐ Yes ☒ Unknown ☐ No

12. Recent deep ground disturbance† (post-1960, widespread and deep land alterations)

☒ Yes ☐ Unknown ☐ No

† Archaeological potential can be determined not to be present for either the entire property or a part(s) of it when the area under consideration has been subject to widespread and deep land alterations that have severely damaged the integrity of any archaeological resources. Deep disturbance may include quarrying or major underground infrastructure development. Activities such as agricultural cultivation, gardening, minor grading and landscaping are not necessarily considered deep disturbance. Alterations can be considered to be extensive or widespread when they have affected a large area, usually defined as the majority of a property.

The entire subject property has been subject to widespread and deep land alterations – it is an active cement plant.

## Scoring the results:

If **Yes** to **any** of **1, 2a, 2b, 2c, 6, 10, or 11** high archaeological potential – assessment is required

If **Yes** to **two or more** of **3, 4, 5, 7, 8, or 9** high archaeological potential – assessment is required

If **Yes** to **12** or **No** to all of **1 - 10** low archaeological potential – assessment is not required. \*\*While the Study Area would have been an area of high archaeological potential (due to proximity to water and a known site within 300m) prior to the construction of the cement plant the widespread disturbance associated with the construction of the cement plant removed the Arch potential of the Study Area. Assessment is not required\*\* Should any ground disturbing activities occur outside of the active cement plant where there has not been extensive disturbance an Arch Assessment is recommended.

If 3 or more **Unknown** an archaeological assessment is required (see note below)

† Note: If information requested in this checklist is unknown, a consultant archaeologist licensed under the *Ontario Heritage Act* should be retained to carry out at least a Stage 1 archaeological assessment to further explore the archaeological potential of the property and to prepare a report on the results of that assessment. The Ministry of Tourism and Culture reviews all such reports prepared by consultant archaeologists against the ministry's Standards and Guidelines for Consultant Archaeologists. Once the ministry is satisfied that, based on the available information, the report has been prepared in accordance with those guidelines, the ministry issues an acceptance letter to the consultant archaeologist and places the report into its registry where it is available for public inspection.

# Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes

## A Checklist for the Non-Specialist

The **purpose of the checklist** is to determine:

- if a property(ies) or project area:
  - is a recognized heritage property
  - may be of cultural heritage value
- it includes all areas that may be impacted by project activities, including – but not limited to:
  - the main project area
  - temporary storage
  - staging and working areas
  - temporary roads and detours

**Processes covered** under this checklist, such as:

- *Planning Act*
- *Environmental Assessment Act*
- *Aggregates Resources Act*
- *Ontario Heritage Act* – Standards and Guidelines for Conservation of Provincial Heritage Properties

### Cultural Heritage Evaluation Report (CHER)

If you are not sure how to answer one or more of the questions on the checklist, you may want to hire a qualified person(s) (see page 5 for definitions) to undertake a cultural heritage evaluation report (CHER).

The CHER will help you:

- identify, evaluate and protect cultural heritage resources on your property or project area
- reduce potential delays and risks to a project

### Other checklists

Please use a separate checklist for your project, if:

- you are seeking a Renewable Energy Approval under Ontario Regulation 359/09 – [separate checklist](#)
- your Parent Class EA document has an approved screening criteria (as referenced in Question 1)

Please refer to the Instructions pages for more detailed information and when completing this form.

Project or Property Name

Lehigh Picton Cement Plant ECA

Project or Property Location (upper and lower or single tier municipality)

1470 Highway 49, Picton, ON K0K 2T0

Proponent Name

Lehigh Hanson Materials Limited

Proponent Contact Information

Nick Papanicolaou, Environmental Manager, Lehigh Hanson Materials Limited

### Screening Questions

	Yes	No
1. Is there a pre-approved screening checklist, methodology or process in place?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If Yes, please follow the pre-approved screening checklist, methodology or process.

If No, continue to Question 2.

### Part A: Screening for known (or recognized) Cultural Heritage Value

	Yes	No
2. Has the property (or project area) been evaluated before and found <b>not</b> to be of cultural heritage value?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If Yes, do **not** complete the rest of the checklist.

The proponent, property owner and/or approval authority will:

- summarize the previous evaluation and
- add this checklist to the project file, with the appropriate documents that demonstrate a cultural heritage evaluation was undertaken

The summary and appropriate documentation may be:

- submitted as part of a report requirement
- maintained by the property owner, proponent or approval authority

If No, continue to Question 3.

	Yes	No
3. Is the property (or project area):		
a. identified, designated or otherwise protected under the <i>Ontario Heritage Act</i> as being of cultural heritage value?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. a National Historic Site (or part of)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. designated under the <i>Heritage Railway Stations Protection Act</i> ?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. designated under the <i>Heritage Lighthouse Protection Act</i> ?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. identified as a Federal Heritage Building by the Federal Heritage Buildings Review Office (FHBRO)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. located within a United Nations Educational, Scientific and Cultural Organization (UNESCO) World Heritage Site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If Yes to any of the above questions, you need to hire a qualified person(s) to undertake:

- a Cultural Heritage Evaluation Report, if a Statement of Cultural Heritage Value has not previously been prepared or the statement needs to be updated

If a Statement of Cultural Heritage Value has been prepared previously and if alterations or development are proposed, you need to hire a qualified person(s) to undertake:

- a Heritage Impact Assessment (HIA) – the report will assess and avoid, eliminate or mitigate impacts

If No, continue to Question 4.



## Part B: Screening for Potential Cultural Heritage Value

	Yes	No
4. Does the property (or project area) contain a parcel of land that:		
a. is the subject of a municipal, provincial or federal commemorative or interpretive plaque?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. has or is adjacent to a known burial site and/or cemetery?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. is in a Canadian Heritage River watershed?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. contains buildings or structures that are 40 or more years old?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Part C: Other Considerations

	Yes	No
5. Is there local or Aboriginal knowledge or accessible documentation suggesting that the property (or project area):		
a. is considered a landmark in the local community or contains any structures or sites that are important in defining the character of the area?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. has a special association with a community, person or historical event?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. contains or is part of a cultural heritage landscape?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**If Yes** to one or more of the above questions (Part B and C), there is potential for cultural heritage resources on the property or within the project area.

You need to hire a qualified person(s) to undertake:

- a Cultural Heritage Evaluation Report (CHER)

If the property is determined to be of cultural heritage value and alterations or development is proposed, you need to hire a qualified person(s) to undertake:

- a Heritage Impact Assessment (HIA) – the report will assess and avoid, eliminate or mitigate impacts

**If No** to all of the above questions, there is low potential for built heritage or cultural heritage landscape on the property.

The proponent, property owner and/or approval authority will:

- summarize the conclusion
- add this checklist with the appropriate documentation to the project file

The summary and appropriate documentation may be:

- submitted as part of a report requirement e.g. under the *Environmental Assessment Act*, *Planning Act* processes
- maintained by the property owner, proponent or approval authority

## Instructions

Please have the following available, when requesting information related to the screening questions below:

- a clear map showing the location and boundary of the property or project area
  - large scale and small scale showing nearby township names for context purposes
- the municipal addresses of all properties within the project area
- the lot(s), concession(s), and parcel number(s) of all properties within a project area

For more information, see the Ministry of Tourism, Culture and Sport's [Ontario Heritage Toolkit](#) or [Standards and Guidelines for Conservation of Provincial Heritage Properties](#).

In this context, the following definitions apply:

- **qualified person(s)** means individuals – professional engineers, architects, archaeologists, etc. – having relevant, recent experience in the conservation of cultural heritage resources.
- **proponent** means a person, agency, group or organization that carries out or proposes to carry out an undertaking or is the owner or person having charge, management or control of an undertaking.

### 1. Is there a pre-approved screening checklist, methodology or process in place?

An existing checklist, methodology or process may already be in place for identifying potential cultural heritage resources, including:

- one endorsed by a municipality
- an environmental assessment process e.g. screening checklist for municipal bridges
- one that is approved by the Ministry of Tourism, Culture and Sport (MTCS) under the Ontario government's [Standards & Guidelines for Conservation of Provincial Heritage Properties](#) [s.B.2.]

## Part A: Screening for known (or recognized) Cultural Heritage Value

### 2. Has the property (or project area) been evaluated before and found not to be of cultural heritage value?

Respond 'yes' to this question, if all of the following are true:

A property can be considered not to be of cultural heritage value if:

- a Cultural Heritage Evaluation Report (CHER) - or equivalent - has been prepared for the property with the advice of a qualified person and it has been determined not to be of cultural heritage value and/or
- the municipal heritage committee has evaluated the property for its cultural heritage value or interest and determined that the property is not of cultural heritage value or interest

A property may need to be re-evaluated, if:

- there is evidence that its heritage attributes may have changed
- new information is available
- the existing Statement of Cultural Heritage Value does not provide the information necessary to manage the property
- the evaluation took place after 2005 and did not use the criteria in Regulations 9/06 and 10/06

**Note:** Ontario government ministries and public bodies [prescribed under Regulation 157/10] may continue to use their existing evaluation processes, until the evaluation process required under section B.2 of the Standards & Guidelines for Conservation of Provincial Heritage Properties has been developed and approved by MTCS.

To determine if your property or project area has been evaluated, contact:

- the approval authority
- the proponent
- the Ministry of Tourism, Culture and Sport

### 3a. Is the property (or project area) identified, designated or otherwise protected under the *Ontario Heritage Act* as being of cultural heritage value e.g.:

- i. designated under the *Ontario Heritage Act*
  - individual designation (Part IV)
  - part of a heritage conservation district (Part V)

## Individual Designation – Part IV

A property that is designated:

- by a municipal by-law as being of cultural heritage value or interest [s.29 of the *Ontario Heritage Act*]
- by order of the Minister of Tourism, Culture and Sport as being of cultural heritage value or interest of provincial significance [s.34.5]. **Note:** To date, no properties have been designated by the Minister.

## Heritage Conservation District – Part V

A property or project area that is located within an area designated by a municipal by-law as a heritage conservation district [s. 41 of the *Ontario Heritage Act*].

For more information on Parts IV and V, contact:

- municipal clerk
  - [Ontario Heritage Trust](#)
  - local land registry office (for a title search)
- 

### ii. subject of an agreement, covenant or easement entered into under Parts II or IV of the *Ontario Heritage Act*

An agreement, covenant or easement is usually between the owner of a property and a conservation body or level of government. It is usually registered on title.

The primary purpose of the agreement is to:

- preserve, conserve, and maintain a cultural heritage resource
- prevent its destruction, demolition or loss

For more information, contact:

- [Ontario Heritage Trust](#) - for an agreement, covenant or easement [clause 10 (1) (c) of the *Ontario Heritage Act*]
  - municipal clerk – for a property that is the subject of an easement or a covenant [s.37 of the *Ontario Heritage Act*]
  - local land registry office (for a title search)
- 

### iii. listed on a register of heritage properties maintained by the municipality

Municipal registers are the official lists - or record - of cultural heritage properties identified as being important to the community.

Registers include:

- all properties that are designated under the *Ontario Heritage Act* (Part IV or V)
- properties that have not been formally designated, but have been identified as having cultural heritage value or interest to the community

For more information, contact:

- municipal clerk
  - municipal heritage planning staff
  - municipal heritage committee
- 

### iv. subject to a notice of:

- intention to designate (under Part IV of the *Ontario Heritage Act*)
- a Heritage Conservation District study area bylaw (under Part V of the *Ontario Heritage Act*)

A property that is subject to a **notice of intention to designate** as a property of cultural heritage value or interest and the notice is in accordance with:

- section 29 of the *Ontario Heritage Act*
- section 34.6 of the *Ontario Heritage Act*. **Note:** To date, the only applicable property is Meldrum Bay Inn, Manitoulin Island. [s.34.6]

An area designated by a municipal by-law made under section 40.1 of the *Ontario Heritage Act* as a **heritage conservation district study area**.

For more information, contact:

- municipal clerk – for a property that is the subject of notice of intention [s. 29 and s. 40.1]
  - [Ontario Heritage Trust](#)
-

- v. included in the Ministry of Tourism, Culture and Sport's list of provincial heritage properties

Provincial heritage properties are properties the Government of Ontario owns or controls that have cultural heritage value or interest.

The Ministry of Tourism, Culture and Sport (MTCS) maintains a list of all provincial heritage properties based on information provided by ministries and prescribed public bodies. As they are identified, MTCS adds properties to the list of provincial heritage properties.

For more information, contact the MTCS Registrar at [registrar@ontario.ca](mailto:registrar@ontario.ca).

### **3b. Is the property (or project area) a National Historic Site (or part of)?**

National Historic Sites are properties or districts of national historic significance that are designated by the Federal Minister of the Environment, under the *Canada National Parks Act*, based on the advice of the Historic Sites and Monuments Board of Canada.

For more information, see the [National Historic Sites website](#).

### **3c. Is the property (or project area) designated under the *Heritage Railway Stations Protection Act*?**

The *Heritage Railway Stations Protection Act* protects heritage railway stations that are owned by a railway company under federal jurisdiction. Designated railway stations that pass from federal ownership may continue to have cultural heritage value.

For more information, see the [Directory of Designated Heritage Railway Stations](#).

### **3d. Is the property (or project area) designated under the *Heritage Lighthouse Protection Act*?**

The *Heritage Lighthouse Protection Act* helps preserve historically significant Canadian lighthouses. The Act sets up a public nomination process and includes heritage building conservation standards for lighthouses which are officially designated.

For more information, see the [Heritage Lighthouses of Canada](#) website.

### **3e. Is the property (or project area) identified as a Federal Heritage Building by the Federal Heritage Buildings Review Office?**

The role of the Federal Heritage Buildings Review Office (FHBRO) is to help the federal government protect the heritage buildings it owns. The policy applies to all federal government departments that administer real property, but not to federal Crown Corporations.

For more information, contact the [Federal Heritage Buildings Review Office](#).

See a [directory of all federal heritage designations](#).

### **3f. Is the property (or project area) located within a United Nations Educational, Scientific and Cultural Organization (UNESCO) World Heritage Site?**

A UNESCO World Heritage Site is a place listed by UNESCO as having outstanding universal value to humanity under the Convention Concerning the Protection of the World Cultural and Natural Heritage. In order to retain the status of a World Heritage Site, each site must maintain its character defining features.

Currently, the Rideau Canal is the only World Heritage Site in Ontario.

For more information, see Parks Canada – [World Heritage Site website](#).

## **Part B: Screening for potential Cultural Heritage Value**

### **4a. Does the property (or project area) contain a parcel of land that has a municipal, provincial or federal commemorative or interpretive plaque?**

Heritage resources are often recognized with formal plaques or markers.

Plaques are prepared by:

- municipalities
- provincial ministries or agencies
- federal ministries or agencies
- local non-government or non-profit organizations

For more information, contact:

- [municipal heritage committees](#) or local heritage organizations – for information on the location of plaques in their community
- Ontario Historical Society's [Heritage directory](#) – for a list of historical societies and heritage organizations
- Ontario Heritage Trust – for a [list of plaques](#) commemorating Ontario's history
- Historic Sites and Monuments Board of Canada – for a [list of plaques](#) commemorating Canada's history

**4b. Does the property (or project area) contain a parcel of land that has or is adjacent to a known burial site and/or cemetery?**

For more information on known cemeteries and/or burial sites, see:

- Cemeteries Regulations, Ontario Ministry of Consumer Services – for a [database of registered cemeteries](#)
- Ontario Genealogical Society (OGS) – to [locate records of Ontario cemeteries](#), both currently and no longer in existence; cairns, family plots and burial registers
- Canadian County Atlas Digital Project – to [locate early cemeteries](#)

In this context, adjacent means contiguous or as otherwise defined in a municipal official plan.

**4c. Does the property (or project area) contain a parcel of land that is in a Canadian Heritage River watershed?**

The Canadian Heritage River System is a national river conservation program that promotes, protects and enhances the best examples of Canada's river heritage.

Canadian Heritage Rivers must have, and maintain, outstanding natural, cultural and/or recreational values, and a high level of public support.

For more information, contact the [Canadian Heritage River System](#).

If you have questions regarding the boundaries of a watershed, please contact:

- your conservation authority
- municipal staff

**4d. Does the property (or project area) contain a parcel of land that contains buildings or structures that are 40 or more years old?**

A 40 year 'rule of thumb' is typically used to indicate the potential of a site to be of cultural heritage value. The approximate age of buildings and/or structures may be estimated based on:

- history of the development of the area
- fire insurance maps
- architectural style
- building methods

Property owners may have information on the age of any buildings or structures on their property. The municipality, local land registry office or library may also have background information on the property.

**Note:** 40+ year old buildings or structure do not necessarily hold cultural heritage value or interest; their age simply indicates a higher potential.

A building or structure can include:

- residential structure
- farm building or outbuilding
- industrial, commercial, or institutional building
- remnant or ruin
- engineering work such as a bridge, canal, dams, etc.

For more information on researching the age of buildings or properties, see the Ontario Heritage Tool Kit Guide [Heritage Property Evaluation](#).

## Part C: Other Considerations

### 5a. Is there local or Aboriginal knowledge or accessible documentation suggesting that the property (or project area) is considered a landmark in the local community or contains any structures or sites that are important to defining the character of the area?

Local or Aboriginal knowledge may reveal that the project location is situated on a parcel of land that has potential landmarks or defining structures and sites, for instance:

- buildings or landscape features accessible to the public or readily noticeable and widely known
- complexes of buildings
- monuments
- ruins

### 5b. Is there local or Aboriginal knowledge or accessible documentation suggesting that the property (or project area) has a special association with a community, person or historical event?

Local or Aboriginal knowledge may reveal that the project location is situated on a parcel of land that has a special association with a community, person or event of historic interest, for instance:

- Aboriginal sacred site
- traditional-use area
- battlefield
- birthplace of an individual of importance to the community

### 5c. Is there local or Aboriginal knowledge or accessible documentation suggesting that the property (or project area) contains or is part of a cultural heritage landscape?

Landscapes (which may include a combination of archaeological resources, built heritage resources and landscape elements) may be of cultural heritage value or interest to a community.

For example, an Aboriginal trail, historic road or rail corridor may have been established as a key transportation or trade route and may have been important to the early settlement of an area. Parks, designed gardens or unique landforms such as waterfalls, rock faces, caverns, or mounds are areas that may have connections to a particular event, group or belief.

For more information on Questions 5.a., 5.b. and 5.c., contact:

- Elders in Aboriginal Communities or community researchers who may have information on potential cultural heritage resources. Please note that Aboriginal traditional knowledge may be considered sensitive.
- [municipal heritage committees](#) or local heritage organizations
- Ontario Historical Society's "[Heritage Directory](#)" - for a list of historical societies and heritage organizations in the province

An internet search may find helpful resources, including:

- historical maps
- historical walking tours
- municipal heritage management plans
- cultural heritage landscape studies
- municipal cultural plans

Information specific to trails may be obtained through [Ontario Trails](#).

June 10<sup>th</sup>, 2022

**Subject: Ministry of Heritage, Sport, Tourism and Culture Industries (MHSTCI) Comments on the Alternative Low Carbon Fuel Use at the Lehigh Picton Cement Plant (MHSTCI File: 0016258)**

Dear Jack,

Thank you for the detailed response to the Notice of Intent to Apply for the Alternative Low Carbon Fuels (ALCFs) at the Picton Cement Plant.

This email is intended to clarify the scope of work and the proposed infrastructure footprint associated with the project. A new storage / material handling facility will be constructed within the active cement plant as part of the ALCFs project. The storage facility will be confined to a 0.5-1-hectare (ha) area within the plant in close proximity to the kiln system.

The ALCFs project footprint is small in relation to the facility size and will not result in ground disturbance to other areas within the property. All ground disturbance will be confined to areas of previous disturbance within the active cement plant.

As the Picton Cement Plant opened in 1958 (as Lake Ontario Cement co), it would have been constructed prior to the enactment of the Ontario Heritage Act, 1990; and no archaeology assessments would have been completed at that time under the *Aggregate Resources Act* (ARA). As such, a Stage 1 Archaeological Assessment and/or Cultural Heritage Report have not been produced for the property.

Knowing that the ground disturbance will not extend beyond an area previously disturbed within the active cement plant, is it still the MHSTCI's recommendation to proceed with a Cultural Heritage Report? We do not believe that this project requires an Archaeological Assessment but would like clarification as to whether a Cultural Heritage Report is required given the nature of the proposed disturbance.

Please advise.

Regards,



Nick Papanicolaou  
Environmental Manager  
Lehigh Cement

## Dabagh, Nadia

---

**From:** LehighPictonALCF <LehighPictonALCF@golder.com>  
**Sent:** November 15, 2022 8:21 AM  
**To:** Capstick, Sean; Dabagh, Nadia  
**Subject:** FW: MHSTCI Letter - ECA - Lehigh Picton Cement Plant  
**Attachments:** MHSTCI Lehigh ALCF\_10 June 2022.pdf; 2022-04-14-Lehigh-ECA-0016258.pdf; Criteria for Evaluating Archaeological Potential - Lehigh Cement Plant Picton ON.docx; MCM Heritage Checklist - Lehigh Picton (1).pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

NOTE: This email chain appears to contain email from outside Golder

FYI

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**From:** Papanicolaou, Nektarios (Picton) CAN <Nektarios.Papanicolaou@lehighhanson.com>  
**Sent:** November 14, 2022 8:13 AM  
**To:** karla.Barboza@ontaio.ca  
**Cc:** LehighPictonALCF <LehighPictonALCF@golder.com>; Schraeder, Carsten (Picton) CAN <Carsten.Schraeder@LehighHanson.com>  
**Subject:** FW: MHSTCI Letter - ECA - Lehigh Picton Cement Plant

### EXTERNAL EMAIL

Hi Karla,

Please find attached the completed screening checklists for Archaeological resources and Built heritage resources and cultural heritage landscapes.

#### **Archaeology:**

While the Study Area is within an area of archaeological potential due to the proximity to water and known archaeological sites, the extensive and widespread disturbance within the cement plant has removed the archaeological potential for the footprint of the building etc, for the ALCF project. Please find attached form converted in word where this caveat has been added to the screening form.

#### **Built Heritage:**

The Lehigh Picton Cement plant has buildings on the property that are older than 40 years old, and therefore; the screening form indicates that the Facility may have the potential for cultural heritage. However, the form also indicates that buildings that are 40+ years do not necessarily hold cultural value or interest. It should be noted that this is a heavy industrial site and the buildings experience significant impacts from the operations. As part of this project, Lehigh is making some minimal modifications to existing buildings (no removal and simply alterations to allow for conveyance of ACLFs) to allow for the use of alternative low carbon fuels (ALCFs) in the cement kiln and reduce their emissions of greenhouse gases. The ALCF project will be limited to a small pre-disturbed area with a new building constructed with covered conveyors connecting to the existing kiln buildings. We have reached out to Michael Michaud (Manager of Planning for the County of Prince Edward) and have yet to hear back on whether any cultural evaluations have been



completed at this time. Please find attached the form, *Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes*

Based on the assessments above, it is the project teams understanding that the ALCF project at Lehigh Picton does not have significant Archaeological and Built Historical potential and therefore no further assessment is required. If you would like to discuss the project further, please do not hesitate to reach out.

Thanks,

Nick

**Nick Papanicolaou**

Environmental Manager

Lehigh Cement  
1370 Hwy 49, Box 6201  
Picton, ON K0K 2T0

Direct: (613) 476-8636

Cell: (613) 438-0361

[nektarios.papanicolaou@lehighhanson.com](mailto:nektarios.papanicolaou@lehighhanson.com)

[www.lehighhanson.com](http://www.lehighhanson.com)



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**From:** Barboza, Karla (MTCS) <[Karla.Barboza@ontario.ca](mailto:Karla.Barboza@ontario.ca)>

**Sent:** September 26, 2022 4:00 PM

**To:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>

**Cc:** Papanicolaou, Nektarios (Picton) CAN <[Nektarios.Papanicolaou@lehighhanson.com](mailto:Nektarios.Papanicolaou@lehighhanson.com)>

**Subject:** RE: MHSTCI Letter - ECA - Lehigh Picton Cement Plant

**EXTERNAL EMAIL**

Hi Jamie,

My sincere apologies for not replying earlier! Please note that Jack Mallon is no longer with the ministry.

I've reviewed your response dated June 10, 2022 and have the following recommendations:

- Archaeological resources: please include the completed screening checklist *Criteria for Evaluating Archaeological Potential* documenting that the project area has been subject to recent extensive and intensive ground disturbance.  
If the proposed undertaking impacts water, please complete the *Criteria for Evaluating Marine Archaeological Potential* to determine whether a marine archaeological assessment is required.
- Built heritage resources and cultural heritage landscapes: Please complete the screening checklist *Criteria for Evaluating Potential for Built Heritage Resources and Cultural Heritage Landscapes*. Please check with the municipality (municipal heritage planner) if the property may have cultural heritage value.

Let me know if you have any other questions.

Regards,  
Karla

Karla Barboza MCIP, RPP, CAHP | (A) Team Lead, Heritage  
Ministry of Tourism, Culture and Sport  
Heritage, Tourism and Culture Division | Programs and Services Branch | Heritage Planning Unit  
T. 416. 660.1027 | Email: [karla.barboza@ontario.ca](mailto:karla.barboza@ontario.ca)

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**From:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Sent:** July-15-22 1:55 PM  
**To:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>; Mallon, Jack (MHSTCI) <[Jack.Mallon@ontario.ca](mailto:Jack.Mallon@ontario.ca)>  
**Cc:** Barboza, Karla (MTCS) <[Karla.Barboza@ontario.ca](mailto:Karla.Barboza@ontario.ca)>; Papanicolaou, Nektarios (Picton) CAN <[Nektarios.Papanicolaou@lehighhanson.com](mailto:Nektarios.Papanicolaou@lehighhanson.com)>  
**Subject:** RE: MHSTCI Letter - ECA - Lehigh Picton Cement Plant

**CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.**

NOTE: This email chain appears to contain email from outside Golder

Hi Jack,

Following up on this – have you had a chance to review our response?

Thanks,  
Jamie

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**From:** LehighPictonALCF  
**Sent:** June 10, 2022 12:31 PM  
**To:** 'Mallon, Jack (MHSTCI)' <[Jack.Mallon@ontario.ca](mailto:Jack.Mallon@ontario.ca)>; LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Cc:** Barboza, Karla (MHSTCI) <[Karla.Barboza@ontario.ca](mailto:Karla.Barboza@ontario.ca)>  
**Subject:** RE: MHSTCI Letter - ECA - Lehigh Picton Cement Plant

Good morning Jack,

Please find attached Lehigh's response to your letter.

Any questions, please reach out.

Kind Regards,

The Lehigh Hanson Project Team



**Jamie McEvoy**  
*Senior Air Quality Engineer, Project Manager*

On behalf of:



**Nick Papanicolaou**  
Environmental Manager  
Cell: (613) 438-0361

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**From:** Mallon, Jack (MHSTCI) <[Jack.Mallon@ontario.ca](mailto:Jack.Mallon@ontario.ca)>  
**Sent:** April 14, 2022 3:47 PM  
**To:** LehighPictonALCF <[LehighPictonALCF@golder.com](mailto:LehighPictonALCF@golder.com)>  
**Cc:** Barboza, Karla (MHSTCI) <[Karla.Barboza@ontario.ca](mailto:Karla.Barboza@ontario.ca)>  
**Subject:** MHSTCI Letter - ECA - Lehigh Picton Cement Plant

#### EXTERNAL EMAIL

Good afternoon,

Please see attached MHSTCI's comments on the Lehigh Picton Cement Plant ECA.

Do not hesitate to contact me if you have any questions.

Regards,

**Jack Mallon**  
Heritage Planner

Heritage Planning Unit | Programs and Services Branch

Heritage, Tourism and Culture Division

Ministry of Heritage, Sport, Tourism and Culture Industries

Phone: 437-522-6582



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