

**The site-specific standard compliance approach provided by Ontario Regulation 419/05 allows a facility time to assess and, where possible, to implement continuous improvement solutions – focusing on actions that reduce emissions impact in the community as much as possible considering best available technologies. These actions are described in the Action Plan and are based on the results from the Technology Benchmarking Report.**

**The Action Plan is as follows:**

- Evaluate the effectiveness of the Material Handling Relocation Project (to be complete in 2021) and where warranted, install tire wash stations to prevent metal containing material from being deposited on roadways.
- Reassess and optimize the road vacuuming, watering and surfactant application schedule after the Material Handling Relocation Project and after the installation of tire wash stations.
- Conduct a study to assess the scope and cost effectiveness of options to reduce truck traffic on the Balsam Street access road including an alternate access from the Godfrey Road off RR35, and rail deliveries.
- Continue implementing the Smelter Property Dust Emission Management Plan (DEMP), including evaluating opportunities to relocate stockpiles, outside work, and adjust traffic patterns away from sensitive areas.
- Conduct an annual evaluation of potential workroom improvement initiatives and implement select initiatives as appropriate.
- Create and implement a standardized “Housekeeping Protocol for Nickel Emissions to the Environment”. This will represent a standardization of our current practices and upgrade to industry best practices.
- Create and implement a standardized “Baghouse and Dust Collection Systems Protocol for Nickel Emissions to the Environment”. This will represent a standardization of our current practices and upgrade to industry best practices.
- Twice over the next ten years, conduct an assessment of the overall dust collection system for each building to ensure the dust collection systems are collecting emissions at the appropriate locations and in the appropriate amounts.
  - » Included in the first study will be an assessment on how to reduce the Filter Plant venturi scrubber dust collection system exhaust to 2 mg/m<sup>3</sup>

Continue the following practices:

- » Operating a community particulate monitoring network
- » Annual reviews of the Environmental Emergency and Spill Prevention and Contingency Plans
- » Bi-Annual community engagement meetings with the Environmental Monitoring Team (EMT)



**Some actions will be in effect immediately, while others will require studies to ensure effective implementation. All actions or studies to support the actions, will be initiated within the first 2 years from the date of approval.**