PERMIT

(Under the provisions of the GVRD Air Quality Management Bylaw No. 725)

R. P. RICHMOND INDUSTRIAL CONTRACTORS LTD.

IS AUTHORIZED TO DISCHARGE AIR CONTAMINANTS

FROM A STEEL CLEANING AND PRIMING PLANT

LOCATED AT 731 CALDEW STREET, DELTA, B.C. V3M 5S3

This permit has been issued under the terms and conditions prescribed in the attached Schedules A, B, C, D, E, F, G & H for emission sources and works existing or planned on October 8, 1993.

[Signature]

ASSISTANT AIR QUALITY DIRECTOR

PERMIT NUMBER GVA0133
INDEX OF SCHEDULES

Schedule A ......................................................... Site Plan
Schedule B ......................................................... General Requirements
Schedule C ........................... Emission Monitoring, Sampling and Reporting Requirements
Schedule D .............................. Emission Sources and Discharge Points
Schedule E ........................................ Authorized Rates of Discharge
Schedule F ........................................ Authorized Discharge Criteria
Schedule G .............................. Authorized Works and Procedures
Schedule H ........................................ Record of Permit Issuance Dates

October 8, 1993

PERMIT NUMBER GVA0133
A. OBJECTIVES AND AMENDMENTS

Ambient air quality guidelines and objectives are prescribed under provisions of applicable legislation. If the level of air quality as prescribed by these criteria is exceeded, the conditions of this Permit may be revised, in order that the desired air quality can be maintained. This Permit may also be amended for other reasons, as authorized by applicable legislation.

B. MAINTENANCE AND OPERATION OF WORKS

Works and procedures, which this Permit authorizes to control the discharge of air contaminants, shall be employed during all operating periods of the related facilities. The Permittee shall regularly inspect and maintain all such works in good repair.

C. EMERGENCY PROCEDURES

An emergency or other condition may prevent the continuous utilization of the above authorized works and procedures, or may result in a discharge of air contaminants which is not authorized by this Permit. If such a situation occurs, the Permittee shall report the circumstances of this event to the Greater Vancouver Regional District, Air Quality and Source Control Department at 436-6777 (24 hours), at the first available opportunity.

No discharge that has bypassed control works is authorized unless the Air Quality Director's approval has been obtained. In the event of an emergency, bypassing facilities may be used for such periods as are necessary to effect a shutdown of the related processes.

D. AIR CONDITIONING, HEATING AND VENTILATION SYSTEMS

Air contaminants discharged from any natural gas-fired air conditioning, heating or ventilation systems for buildings located at the discharge site are not specified in this Permit. These works shall be maintained and operated in a manner prescribed by the manufacturer to ensure good combustion of the fuel with minimum discharge of air contaminants. Notwithstanding the above, the Air Quality Director may at his discretion stipulate limits for emission of contaminants from these sources in the Permit at a future date under provisions of the Bylaw.

October 8, 1993

ASSISTANT AIR QUALITY DIRECTOR
E. GENERAL SITE RESTRICTIONS

No air contaminant(s) from any single source, or combination of sources shall pass the boundary of the property, described in Section H of this Schedule B, such that the Air Quality Director determines that air pollution has occurred.

F. ENGINEERING UNITS

The engineering units specified in this Permit are in accordance with the Metric System of measure. Approximate equivalent values for the British System can be calculated using the following conversion factors.

\[
\begin{align*}
\text{mg/m}^3 & \times 0.000437 = \text{gr/cf} \\
\text{m}^3/\text{min} & \times 35.3 = \text{cf/min} \\
\text{kg/m}^3 & \times 0.0624 = \text{lbs/cf} \\
\text{kg/L} & \times 10.0 = \text{lbs/gal} \\
\text{mg/m}^3 & \times 24.0/M = \text{ppm (by volume)} \\
\text{GJ/h} & \times 0.9478 = \text{MMBTU/h}
\end{align*}
\]

where

\[
\begin{align*}
\text{m}^3 & = \text{cubic metre} & \text{min} & = \text{minute} \\
\text{mg} & = \text{milligram} & \text{cf} & = \text{cubic feet} \\
\text{s} & = \text{second} & \text{lb} & = \text{pound} \\
\text{kg} & = \text{kilogram} & \text{gal} & = \text{gallon} \\
\text{L} & = \text{litre} & \text{M} & = \text{molecular weight} \\
\text{gr} & = \text{grain} & \text{ppm} & = \text{parts per million} \\
\text{GJ} & = \text{GigaJoule} & \text{MMBTU} & = \text{Million British Thermal Unit} \\
& & \text{h} & = \text{hour}
\end{align*}
\]

October 8, 1993

[Signature]
ASSISTANT AIR QUALITY DIRECTOR

SCHEDULE B - PAGE 2
G. STANDARD CONDITIONS AND DEFINITIONS

Except where otherwise indicated, the following standard conditions and definitions apply to this Permit.

1. The Restrictions in the attached Schedules are maximum limits.

2. Gaseous volumes are corrected to dry conditions of 20° Celsius & 760mm Hg.

3. Particulate matter from combustion sources is corrected to 12% Carbon Dioxide.

4. Opacity is measured at the point of maximum density, nearest the discharge point.

5. Opacity measurements exclude the effect of condensed, uncombined water droplets.

6. Definitions in the Waste Management Act and GVRD Air Quality Management Bylaw No. 725 apply to terminology used in this Permit.

7. Threshold Limit Values (TLV) refer to the Time Weighted Average (TWA) exposure limits for substances specified in the American Conference of Governmental Industrial Hygienists Threshold Limit Values handbook for the years 1991 - 1992.

8. Any production, storage, transportation, handling, treatment, processing or ownership of a special waste must comply with the requirements of the Waste Management Act, Special Waste Regulation.

H. DESCRIPTION OF DISCHARGE SITE

The land from which the air contaminants are discharged is described as "Municipality of Delta Parcel Identifier: 006-158-684 Lot 86 District Lot 312 Group 1 New Westminster District Plan 46270".

October 8, 1993

ASSISTANT AIR QUALITY DIRECTOR
This Schedule describes emission monitoring, sampling and reporting requirements.

The Permittee shall conduct the following monitoring and sampling program on the discharges and submit the results to the Air Quality Director. The need for increased or decreased monitoring may be reviewed periodically by the Air Quality Director.

<table>
<thead>
<tr>
<th>EMISSION NUMBER</th>
<th>DUE DATE(S)</th>
<th>REQUIREMENT(S)</th>
</tr>
</thead>
<tbody>
<tr>
<td>General</td>
<td>March 31, 1994 and annually thereafter</td>
<td>Written report detailing the types and amounts of principal products produced and principal raw materials used in the preceding calendar year.</td>
</tr>
<tr>
<td>General</td>
<td>March 31, 1994 and annually thereafter</td>
<td>Written report detailing the types and amounts of fuel burned in the preceding calendar year.</td>
</tr>
<tr>
<td>General</td>
<td>March 31, 1994 and annually thereafter</td>
<td>Written report detailing the types, amounts and end use of organic solvents and organic solvent-containing materials used in the preceding calendar year.</td>
</tr>
</tbody>
</table>

Emission testing and ambient air sampling and monitoring, shall be undertaken by the Permittee when required by the Air Quality Director.

October 8, 1993

ASSISTANT AIR QUALITY DIRECTOR

SCHEDULE C - PAGE 1
The authorized emission sources and discharge points located approximately as shown on Schedule A are:

<table>
<thead>
<tr>
<th>EMISSION NUMBER</th>
<th>EMISSION SOURCE</th>
<th>DISCHARGE POINT</th>
</tr>
</thead>
<tbody>
<tr>
<td>01</td>
<td>Wheelabrator steel shot blast cleaning unit</td>
<td>Baghouse exhaust</td>
</tr>
<tr>
<td>02</td>
<td>Wheelabrator automated spray paint chamber</td>
<td>Wall vent</td>
</tr>
<tr>
<td>03</td>
<td>Wheelabrator manual spray paint chamber</td>
<td>Wall vent</td>
</tr>
<tr>
<td>04</td>
<td>Wheelabrator paint dryer</td>
<td>Wall vent</td>
</tr>
<tr>
<td>05</td>
<td>Wheelabrator paint dryer heater</td>
<td>Two stacks</td>
</tr>
</tbody>
</table>

October 8, 1993

ASSISTANT AIR QUALITY DIRECTOR
The authorized rates of discharge for the emission sources described in Schedule D are:

<table>
<thead>
<tr>
<th>EMISSION NUMBER</th>
<th>MAXIMUM AUTHORIZED RATE OF DISCHARGE</th>
<th>NOTES &amp; ADDITIONAL REQUIREMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>FLOW m³/min</td>
<td>DURATION hours/day</td>
</tr>
<tr>
<td>01</td>
<td>300</td>
<td>24</td>
</tr>
<tr>
<td>02</td>
<td>200</td>
<td>24</td>
</tr>
<tr>
<td>03</td>
<td>200</td>
<td>24</td>
</tr>
<tr>
<td>04</td>
<td>28</td>
<td>24</td>
</tr>
<tr>
<td>05</td>
<td>5</td>
<td>24</td>
</tr>
</tbody>
</table>

October 8, 1993

ASSISTANT AIR QUALITY DIRECTOR
The authorized maximum discharge criteria for emission sources described in Schedule D are:

<table>
<thead>
<tr>
<th>EMISSION NUMBER</th>
<th>PARAMETER</th>
<th>RESTRICTION</th>
<th>NOTES</th>
</tr>
</thead>
<tbody>
<tr>
<td>02, 03 &amp; 04</td>
<td>Chemical contaminants</td>
<td>See notes</td>
<td>The maximum allowable emission concentration (EC) for each emitted chemical contaminant with a Threshold Limit Value (TLV) is such that the sum of the individual EC/TLV ratios for all such contaminants is less than 10.</td>
</tr>
<tr>
<td>02, 03 &amp; 04</td>
<td>Odour</td>
<td>See notes</td>
<td>None past the plant boundary such that the Air Quality Director determines that air pollution has occurred.</td>
</tr>
<tr>
<td>01</td>
<td>Opacity</td>
<td>10 percent</td>
<td>May be exceeded to a maximum of 30% for a total of 3 min/hour.</td>
</tr>
<tr>
<td>01 &amp; 02</td>
<td>Particulate matter</td>
<td>50.0 mg/m³</td>
<td>Typical products of natural gas combustion at a maximum firing rate of 0.42 GJ/hr. (0.40 MMBTU/hr.).</td>
</tr>
<tr>
<td>05</td>
<td>Combustion products</td>
<td>See notes</td>
<td></td>
</tr>
</tbody>
</table>

October 8, 1993

ASSISTANT AIR QUALITY DIRECTOR
The authorized works and procedures to control the discharge of air contaminants from the emission sources described in Schedule D are indicated below. The Air Quality Director may require that further works be installed, if the existing works, in his opinion, do not provide an acceptable level of emission control. New works or alterations to existing works must be approved, in principle, by the Air Quality Director.

Where the Air Quality Director has specified that additional works are required, the maximum discharge criteria described in Schedule F of this Permit are applicable as specified by the Completion Date(s) listed below. Prior to the specified date(s) the existing control works and procedures must be maintained in good operating condition and operated in a manner to minimize emissions.

<table>
<thead>
<tr>
<th>EMISSION NUMBER</th>
<th>COMPLETION DATE</th>
<th>DESCRIPTION OF WORKS/PROCEDURES</th>
</tr>
</thead>
<tbody>
<tr>
<td>01</td>
<td>Completed</td>
<td>Wheelabrator Model 126-D No. 8 dust collector and related appurtenances together with good operating practices.</td>
</tr>
<tr>
<td>02</td>
<td>Completed</td>
<td>Water curtain and related appurtenances together with good operating practices.</td>
</tr>
<tr>
<td>03</td>
<td>Completed</td>
<td>Water curtain and related appurtenances together with good operating practices.</td>
</tr>
<tr>
<td>04</td>
<td>Completed</td>
<td>Good operating practices.</td>
</tr>
<tr>
<td>05</td>
<td>Completed</td>
<td>The firing of the heater with natural gas using good combustion practices and operating procedures.</td>
</tr>
</tbody>
</table>

October 8, 1993

Assistant Air Quality Director
## RECORD OF PERMIT ISSUANCE

<table>
<thead>
<tr>
<th>DATE</th>
<th>ACTION</th>
<th>SECTIONS AFFECTED</th>
</tr>
</thead>
<tbody>
<tr>
<td>November 30, 1992</td>
<td>Issuance</td>
<td>Face, Schedules A, B, C, D, E, F, G &amp; H</td>
</tr>
<tr>
<td>October 8, 1993</td>
<td>Amended</td>
<td>Face, Schedules A, B, C, D, E, F, G &amp; H</td>
</tr>
</tbody>
</table>

October 8, 1993

Assistant Air Quality Director