Summary of the Application of Ontario EPA Waste Regulatory Regime to End of Life Vehicle Waste Preparation Date: November 29, 2011

NOTICE TO READER: The information contained within was prepared by Summerhill Group Inc. and is intended for discussion purposes only. All regulations referred to are under Ontario's Environmental Protection Act (EPA).

The following table includes wastes common to Ontario auto recycling facilities, but may not be comprehesive for all facilities. The waste types and characterizations are common, but not necessarily corret. The generator is responsible for properly characterizing all waste and ensuring they are handled in accordance with Ontario laws.

| Common Name of Wastes | Possible Subject Waste Class | Possible Characteristic | Generator Registration Required*** | Manifesting Requirement | Storage Notice Threshold | Within 5 Days After 90 Day Storage Requirement | Storage Period | Manifest Retention | Generator Registration Requirement | Storage Requirement |
|--|--|---|---|----------------------------|--------------------------------|---|----------------------|-----------------------|---|--|
| | Reg 347 "Manual"* | Reg 347 "Manual"* | Reg 347 "Manual"* | Reg 347 "Manual"* | Reg 347 S.17.2(3) | See Below | Reg 347 S.17.2(2) | Reg 347 S18.(8) | See Below | Reg 347 S.17.2(1) |
| Used Oils | 252 | L (Liquid Industrial) | >25 Litres generated per month or accumulated on-site , Reg 347 "Manual" | >25 Litres | 90 Days | 1) Notice of | 24 Months | 4 Months 2 Years | 1) Yearly by Febuary 15th, Reg 347 S.18.(1) 2) Keep generator registration report for 3 years, Reg 347 S.18(6.1) | Prevent leaks, spills or damage or deterioration of storage container |
| Antifreeze | 212 | L (Liquid Industrial) | | >25 Litres | 90 Days | | | | | |
| Windshield Washer Fluid | 212 | L (Liquid Industrial) | | >25 Litres | 90 Days | | | | | |
| Oil/Water Separator Sludge | 251 | L (Liquid Industrial) | | >25 Litres | 90 Days | | | | | |
| Used Oils | 252 | H (Hazardous) | | >5 Kg | 90 Days | | | | | |
| Waste Fuels including Gasoline / Diesel | 221 | l (Ignitable) | | >5 Kg | 90 Days | | | | | |
| Varsol / Parts Cleaning Solvents | 213 | I (Ignitable) | | >5 Kg | 90 Days | | | | | |
| Car Batteries (Lead Acid) | "Intact Waste Battery" not defined as subject waste if destined for a waste battery recovery facility, Reg 347 S.1.3(2). | | | | | | | | | |
| Mercury Switches | "Common Mercury Waste" not defined as subject waste if destined for a common mercury waste recovery facility, Reg 347 S1.3(3). | | | | | | | | | |
| Contaminated Soil / Absorbents / Oily Rags | Classification of waste is the responsibilibty of the generator. Waste Management Company may assist in determining proper disposal options. | | | | | | | | | |
| Tires | | <5000 Tires On Site or Total Volume of all Piles on Site <300m³, O.Reg347 S.6(3). | | | | | | | | |

| Common Name of Wastes | Possible Subject Waste Class | Possible Characteristic | Generator Registration Required*** | | Notice | Within 5 Days After 90 Day Storage Requirement | Storage Period | Manifest Retention | Generator Registration Requirement | Storage Requirement |
|---|---------------------------------------|---|--|--|----------------------|---|----------------------|--|--|---|
| | Reg 347 "Manual"* | Reg 347 "Manual"* | Reg 347 "Manual"* | Reg 347 "Manuai"* | Reg 347 S.17.2(3) | See Below | Reg 347 S.17.2(2) | Reg 347 S18.(8) | See Below | Reg 347 S.17.2(1) |
| Used Oils and Lubricants Burned for Comfort Heating / Waste-Derived Fuel** | 252 | L (Liquid Industrial) or H (Hazardous) | Will Always Be Required | See Used Oil Section Above If Off-Site Disposal Required | N/A - As per ECA | N/A - As per ECA | N/A - As per ECA | See Used Oil Section Above If Off- Site Disposal Required | 1) Yearly by Febuary 15th, Reg 347 S.18.(1) & 2) Keep generator registration report for 3 years, Reg 347 S.18(6.1) | deterioration of storage container, Reg |

^{*&}quot;Manual" means publication "Registration Guidance Manual for Generators of Liquid Industrial and Hazardous Waste", MOE, April 1995, as amended

^{**}Requires: Environmental Compliance Approval (ECA) issued by the Ontario Ministry of the Environment issued under Part II.1 of the Environmental Protection Act and; site located in Territorial District of Algoma, Cochrane, Kenora, Manitoulin, Nipissing, Parry Sound, Rainy River, Sudbury, Thunder Bay or Timiskaming, Reg 347, S.28.3-6.
***Register Subject Wastes at www.hwin.ca

| Waste Refrigerants | Expected Subject Waste Class | Waste Designation | Disposal Options | Prohibition / Discharge | Storage Threshold | Longer than 6 Month Storage Requirement | Maximum Storage Period | Record Retention | Other Requirements | Storage Requirements |
|--|---------------------------------------|--|---|---|--|---|---|--|---|---|
| Possession of Collected Class 1 Ozone Depleting Substances (Includes R-12) prior to January 1, 2012* | | N/A | Wholesale dealer in refrigerants, or a mobile refrigerant waste disposal site that is subject to an ECA to handle mobile refrigerant waste, O Reg 463/10 S.36 and Reg 347 S.37 (1)b | Do Not Discharge in Natural Environment or Building, Sell or Reuse, etc. O Reg463/10, S.2 and Reg 347 S.36(1) | Dispose Not Later Than July 1, 2012, O Reg 463/10 S.35(1) | On application, the Director may extend storage time, O Reg 463/10 S. 35(3) | Not Later Than July 1, 2012, Reg463/10 S.35(1) | Keep written records for 2 years. See Reg 347 S.38 (1)&(4) for record details. | Certification in use of refrigerants and refrigeration equipment, O Reg 463/10 S.34 | Container Requirements, O Reg 463/10, S.28 |
| Possession of Collected Class 1 Ozone Depleting Substances (Includes R-12) on or after January 1, 2012* | NA | Designated Hazardous Waste on or after July 1, 2012, O Reg 463/10 S.37 | See Above | Do Not Discharge in Natural Environment or Building, Sell or Reuse, etc. O Reg463/10, S.2 | 6 Months after refrigerant is collected, O Reg 463/10, S.35(2) | On application, the Director may extend storage time, O Reg 463/10 S. 35(3) | 6 Months after refrigerant is collected, O Reg 463/10, S.35(2) | Keep written records for 2 years. See Reg 347 S.38 (1)&(4) for record details. | Certification in use of refrigerants and refrigeration equipment, Reg 463/10 S.34 | Container Requirements, O Reg 463/10, S.28 |
| Individual / Contaminated Refrigerants Not Containing Class 1 or 2 Ozone Depleting Substances (Includes R-134a) | NA | NA | A mobile refrigerant waste recycler or a mobile refrigerant waste disposal site that is subject to an ECA to handle mobile refrigerant waste, Reg 347 S.37 (1)b | Do Not Discharge in Natural Environment or within a building, O Reg463/10 S.19(1) and Reg 347 S.36(1) | NA | NA | NA | Keep written records for 2 years. See Reg 347 S.38 (1)&(4) for record details. | Certification in use of refrigerants and refrigeration equipment, O Reg 463/10 S.34 | Container Requirements, O Reg 463/10, S.28 |

^{*}Includes other refrigerants mixed with class 1 ozone depleting substances, O Reg 463/10 S.2

| Common Name of Reuse Products | |
|--|---|
| Antifreeze | Ontario auto recyclers may not designate collected products as a waste. To be reused or sold for there original intended purpose. |
| Windshield Washer Fluid | |
| Gasoline / Diesel | |
| Car Batteries (Lead Acid) | |
| Tires | |
| Refrigerants - Halocarbons (Includes R-134a) | Sale or transfer of refrigerant, O Reg 463/10 S.29 (2) |

Spills

See Part X of the EPA for requirements in the event of a spill of a pollutant, including immediate notification to the Ministry of the Environment and others under Section 92. There may be some exemptions from some notification requirements available as per O Reg 675/98 and O Reg 463/10. There are no exemptions from the duty to clean up a spill per the EPA (mitigation and requirements are outlined in Section 93).