

ENVIRONMENTAL INQUIRY AND COMPLAINT PROCEDURE

1. PURPOSE

This operating procedure establishes the process for receiving, documenting, assessing, responding to, and recording environmental complaints related to building and activities registered under the Environmental Activity and Sector Registry (EASR) (Appendix A).

This procedure supports compliance with applicable environmental legislation and ensures timely and appropriate response to complaints related to air emissions and associated environmental concerns, including communication with the Ministry of the Environment, Conservation and Parks (MOECP) when required.

2. SCOPE

This procedure applies to all environmental complaints associated with University of Guelph buildings or activities that fall within the scope of the EASR and O.Reg. 1/17, including but not limited to complaints related to

- Outdoor Air Quality
- Odours
- Air emissions
- Fugitive dust
- Noise (where applicable to air emissions activities)
- Suspected discharges or abnormal operating conditions affecting air

3. INITIAL NOTIFICATION AND INTAKE

If University personnel receive an environmental complaint related to air emissions or environmental concerns associated with an EASR registered building or activity, Environmental Health and Safety (EHS) must be contacted immediately via Campus Safety Office.

- Campus Safety Office (x2000) or 519-840-5000

Campus Safety Office will notify the appropriate EHS contact regarding the incident immediately.

4. ROLES AND RESPONSIBILITIES

Environmental Health and Safety (EHS)

- Acts as lead for environmental health and safety inquiries and complaints
- Conducts initial screening and investigation of complaints
- Determines applicability to O. Reg. 1/17 and other regulatory requirements
- Coordinates response and corrective actions with applicable University Departments/Units
- Serves as primary liaison with MOECP and other regulators
- Maintains records

Campus Safety Office

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- Receives incident notifications
- Provides immediate support as required
- Notifies EHS without delay

University Departments/Units

- Cooperate with EHS investigations
- Provide relevant information, access, and corrective actions as required

University of Guelph Leadership

- Receives notification of significant or reportable incidents

5. DOCUMENTATION REQUIREMENTS

All complaints related to EASR-registered buildings or activities will be documented by EHS using the Record of Environmental Inquiry Form (see Appendix B).

At a minimum, the following information will be collected:

- The date and time the complaint was received.
- Name and contact information of the complainant (if available)
- A copy of the written complaint or a summary of verbal complaints.
- Location and nature of concern.
- Identification of whether the complaint is associated with an EASR-Registered building or activity under O.Reg. 1/17.
- Initial assessment of potential environmental or health impact.
- A summary of the measures taken, if any, to address the complaint.
- Determination of whether regulatory notification is required.

EHS will save all documentation in an electronic file on the EHS shared drive and track incidents in the Environmental Inquiry and Complaint Log.

6. INITIAL ASSESSMENT AND RISK TRIAGE

EHS will conduct an initial assessment to determine:

- Whether the complaint relates to air emissions or environmental conditions regulated under O.Reg. 1/17.
- Whether an abnormal operating condition, deviation, or discharge may have occurred.
- Whether there is an actual or potential adverse effect to the environment or human health.
- The urgency and scope of response actions required

Where uncertainty exists, EHS will apply a precautionary approach and consult MOECP as appropriate.

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7. REGULATORY NOTIFICATIONS (IF REQUIRED)

7.1. Spills Action Centre Notification

Where a complaint indicates a potential spill, discharge, or adverse effect that meets reporting thresholds under the Environmental Protection Act, EHS will notify the MOECP Spills Action Centre without delay.

MOECP Spills Action Centre: 1-800-268-6060

For other releases or incidents, EHS will notify the appropriate regulator(s), as necessary.

8. INTERNAL NOTIFICATION

For significant incidents or reportable spills, EHS will notify:

- Director Health, Safety & Wellness
- Associate Vice-President, Human Resources
- Vice-President (Finance & Operations)

A summary of the complaint and response will be shared with the applicable Joint Health and Safety Committee, where appropriate.

9. RESPONSE & CORRECTIVE ACTIONS

EHS will initiate immediate action to resolve and eliminate the concern to the satisfaction of all involved. Listed are some of the actions and resources that may be employed:

- Gathering information from affected individuals
- Review of process, equipment involved, or operations
- Investigate planned and unplanned releases or spills
- Sampling, analysis and measurements of element causing concern
- Engaging external consultants with relevant expertise
- Form an internal team with department or other employees that may aid in resolving the problem

All actions will be documented and traced to completion.

10. COMMUNICATION AND CLOSURE

Where contact information is available, EHS will:

- Acknowledge receipt of the complaint
- Provide updates as appropriate
- Document resolution and formally close the incident log

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Appendix A – EASR(s) Air Emission Registered Resources List

| EASR Number | Faculty/Department | Building No. | Registered Sources |
|--------------------|----------------------------|---------------------|--|
| R-010-1114548475 | Food Science | #038, #088 | <ul style="list-style-type: none"> • Six (6) Lab fume hood exhausts (EF_3, EF_3A, FH_31-32, FH_50, FH_53, FH_54) |
| R-010-1114548475 | Animal Science & Nutrition | #070 | <ul style="list-style-type: none"> • Ten (10) Lab fume hood exhausts (FH_1, FH_12A, FH_52, FH_53, FH_59, FH_106, FH_107, FH_108, FH_113, FH_Cl) • One (1) Dust collector (DC_1) • One (1) Meat smokehouse unit exhaust (SMOKE_1) |
| R-010-8115885934 | MacNaughton | #073 | <ul style="list-style-type: none"> • Three (3) laboratory fume hood strobic exhausts (EF116A, EF116B and EF116C), with tri-stack system technology, model number TS4S400A12. • One (1) laboratory fume hood exhaust (FH-120), manufactured by M.K. Plastics with a model number of CNW 200 |

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Appendix B – Record of Environmental Inquiry Form

| Record of Environmental Inquiry | | | |
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| Report Completed by: | | Date Reported: | |
| Complaint Reported by: | | Time Reported: | |
| Organization or Affiliation: | | Date of Incident: | |
| Tel: | | Time of Incident | |
| Email: | | | |
| Address: | | | |
| Description of Complaint or Inquiry | | | |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Odour | <input type="checkbox"/> Pollution | <input type="checkbox"/> Other |
| Describe the event in detail, including time, duration, location | | | |
| | | | |
| Weather conditions at the time of the event: | | | |
| Wind direction: | | Light conditions: | |
| Wind speed: | | Precipitation: | |
| Temperature: | | Other: | |
| Cloud cover: | | | |
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| U of G Operations at the time of event: | | | |
| Consider: Any unplanned air release, spill, any exceedance of usage restriction under EASR | | | |

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| Steps taken to prevent recurrence | |
| | |
| Regulator Notified: | |
| <input type="checkbox"/> Spills Action Centre | <input type="checkbox"/> Other _____ |