

SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPONENT:	CITY OF WINNIPEG
PROPOSAL NAME:	City of Winnipeg Brady Road Resource Management Facility – Household Hazardous Waste Depot
CLASS OF DEVELOPMENT:	DGH&T Act
TYPE OF DEVELOPMENT:	Household Hazardous Waste Depot
CLIENT FILE NO.:	5638.00

OVERVIEW:

An amended *Dangerous Goods Handling & Transportation Act* Application has been filed by The City of Winnipeg for the construction and operation of a Household Hazardous Waste collection and transfer facility at 1901 Brady Road, Winnipeg, Manitoba. *The Dangerous Goods Handling & Transportation Act* Application filed by The City of Winnipeg on February 15, 2013 was for the continued operation of a waste lead acid battery transfer depot at 1901 Brady Road, Winnipeg. As per the amended proposal, the facility will accept household hazardous wastes including paint, flammable liquids, toxic materials, corrosive materials, lead acid batteries, compressed gas cylinders, used oil and used oil filters, store them temporarily and then transport them to a licensed facility for processing.

The Proposal was advertised in the Winnipeg Free Press on Saturday, February 28, 2015. Copies of the proposal were placed in the Public Registries at the Legislative Library and the Millennium Public Library as well as the online Public Registry. The proposal was distributed to the Technical Advisory Committee (TAC) on February 27, 2015. The closing date for TAC and public comments was on March 27, 2015.

On May 5, 2015, the proponent submitted another revision to the amended proposal. In this, the proponent was proposing to install the used oil tank inside the household hazardous waste building rather than outside. The revised layout of the building was also submitted. The revised submission is attached.

COMMENTS FROM THE PUBLIC:

No public responses were received.

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE (TAC):

Following is a summary of TAC comments received pertaining to the Proposal. Copies of the original comments from TAC are available in the Public Registries.

Office of the Fire Commissioner (OFC)

The Office of the Fire Commissioner recommends that the proponent obtain a building permit prior to construction of this facility (and an occupancy permit after the construction is satisfactorily completed). The building and occupancy permit applications can be obtained from the City of Winnipeg. Also, the proponent should submit a Fire Safety Plan in conformance with section 2.8 of the Manitoba Fire Code to the Winnipeg Fire Department.

Comment provided to proponent as information and the proponent responded by indicating the following:

We are currently in discussion with the City of Winnipeg regarding building and occupancy permits for the Household Hazardous Waste building based on the proposed revised design. Furthermore, a Fire Safety Plan in conformance with Section 2.8 of the Manitoba Fire Code will be submitted to the Winnipeg Fire Department.

Disposition:

No action needed.

Manitoba Conservation and Water Stewardship - Environmental Compliance and Enforcement Branch

Environmental Compliance and Enforcement has reviewed the above noted Dangerous Goods Handling and Transportation Act License Amendment Application and would like to make the following comments:

1. Please identify the end disposal facility for each of the wastes listed in Table 1 of the proposal.
2. Does the proponent intend to install bollards around the aboveground used oil tank to prevent damage to the tank?
3. What is the proposed method of disposal for the spilled material, runoff, snowmelt, or rainwater collected in the sump/catch basin area?
4. What is the protocol for accepting materials at the site? Are there any materials that will be considered unacceptable?
5. What equipment will be utilized in the HHW building? Where will it be stored/maintained when not in use?
6. Please identify what will be used for the "drain guard" and how it will be monitored/maintained?
7. The proponent will be required to update their HW generator registration information to include additional wastes identified in the proposal.

Proponent's Response (this response is attached with this document for reference):

1. Please identify the end disposal facility for each of the wastes listed in Table 1 of the proposal.

See attached Table 1B (attached).

2. Does the proponent intend to install bollards around the aboveground used oil tank to prevent damage to the tank?

The above ground used oil tank will be inside the building (see revised Figure 2, attached); it is expected that the building will prevent damage to the tank.

3. What is the proposed method of disposal for the spilled material, runoff, snowmelt, or rainwater collected in the sump/catch basin area?

The sump provides 380 litres of storage, and includes a "drain guard" to filter sediment and maintain sump capacity. The liquid in the sump flows will be removed by a vac truck (vactor) and sent to an appropriate facility (e.g. Miller Environmental for chemicals, Green for Life for hydrocarbons). Spill kits will also be strategically located at the facility to mitigate migration of spills that may occur.

4. What is the protocol for accepting materials at the site? Are there any materials that will be considered unacceptable?

Customers will be greeted by staff, and drop-off items will be reviewed prior to being accepted. Training will be provided to staff to understand which materials are accepted. Only materials listed in the proposal will be accepted at the site.

5. What equipment will be utilized in the HHW building? Where will it be stored/maintained when not in use?

A hand-jack will be utilized in the HHW building. The hand-jack will be stored either in the maintenance building at the BRRMF, or in the HHW building ("under" one of the pallets).

6. Please identify what will be used for the "drain guard" and how it will be monitored/maintained?

Product information sheet attached. Drain guard will be "inspected" on a monthly basis, or when spills are evident around the sump. The drain guard fabric will be replaced in accordance with manufacturer recommendations.

7. The proponent will be required to update their HW generator registration information to include additional wastes identified in the proposal.

HW generator registration information is in the process of being updated (see attached form).

Disposition:

The licence contains clauses requiring the licensee to address these requirements.

Manitoba Conservation and Water Stewardship - Environmental Programs & Strategies Branch, Air Quality Section

Air Quality Section has reviewed the above proposal and provides the following comment:

- It is expected that the proposal will have no significant impact on air quality provided that VOC containing hazardous materials like used oil, paint etc. will be handled and stored properly to prevent VOC release into the ambient air.

Disposition:

The Licence includes clauses which address these recommendations.

Manitoba Conservation and Water Stewardship – The Office of Drinking Water

Office of Drinking Water reviewed the above noted EAP and found no cause for concern respecting drinking water quality or safety.

Disposition:

No action needed.

Manitoba Agriculture, Food and Rural Development – Crops Branch

No concerns from an agriculture perspective.

Disposition:

No action needed.

Manitoba Conservation and Water Stewardship - The Lands Branch

Lands Branch – MCWS has no comment/concern as regards Brady Road HHW Facility (File: 5638.00) as no Crown lands are impacted by the proposal.

Disposition:

No action needed.

Manitoba Infrastructure and Transportation

MIT has reviewed the proposal under the *Dangerous Goods Handling and Transportation Act* noted above and we do not have any concern.

Disposition:

No action needed.

Manitoba Conservation and Water Stewardship - Water Science and Management Branch

Water Science and Management Branch reviewed the proposal for the proposed household hazardous waste facility at the Brady Road Landfill on behalf of the Water Quality Management Section of Manitoba Conservation and Water Stewardship. Water Science and Management Branch has no substantive concerns with the proposal.

Disposition:

No action needed.

Manitoba Conservation and Water Stewardship - Parks and Protected Spaces Branch

Parks and Protected Spaces Branch has reviewed the file submitted pursuant to the *Environment Act* for DGHT Request for review & comment - Brady Road HHW Facility File: 5638.00. The Branch has no comments or concerns to offer as it does not affect any provincial parks, park reserves, ecological reserves, areas of special interest, or proposed protected areas.

Disposition:

No action needed.

Manitoba Conservation and Water Stewardship - Land Management & Planning Section

Based on the information provided, the Land Management & Planning Section has no comment as no Crown lands are impacted by the proposal.

Disposition:

No action needed.

Manitoba Conservation and Water Stewardship – Wildlife Branch

No wildlife related concerns.

Disposition:

No action needed.

Canadian Environmental Assessment Agency - Prairie and Northern Region

The proposed project is not subject to CEAA 2012, therefore the Agency will not be involved further.

Disposition:

No action needed.

Manitoba Conservation and Water Stewardship - Water Use Licensing Section

No concerns.

Disposition:

No action needed.

PUBLIC HEARING:

A public hearing is not recommended.

CROWN ABORIGINAL CONSULTATION:

The Project is located on land owned by the applicant (City of Winnipeg) and within the Brady Road Resource Management Facility (BRRMF). All surrounding lands potentially affected are designated as Agricultural General Zone and Rural Green Zone. The project would not affect resource use on land or water. There are no adjacent or nearby First Nations.

RECOMMENDATION:

The provincial TAC expressed no concerns, or concerns are addressed in the draft licence, regarding the proposal. Therefore, it is recommended that the Development be licensed under *The Dangerous Goods Handling and Transportation Act* subject to the limits, terms and conditions as described on the attached draft DGH&T Act licence. It is further recommended that enforcement of the Licence be assigned to the Central Region.

PREPARED BY:

Raj Rathamano
Environmental Approvals Branch
June 5, 2015
Telephone: (204) 945-7086 / Fax: (204) 945-5229
E-mail Address: raj.rathamano@gov.mb.ca

May 5, 2015



Environmental Approvals Branch
Manitoba Conservation
Suite 160 – 123 Main Street
Winnipeg, Manitoba R3C 1A5

Attention: Mr. Raj Rathamano
Hazardous Waste Program Specialist / Environment Officer

***Dangerous Goods Handling and Transportation Act Application (File No. 5638.00) –
Response to Comments from TAC***

Dear Mr. Rathamano:

On behalf of the City of Winnipeg (Winnipeg), we have prepared the following responses to comments received from the Technical Advisory Committee (TAC) members via a letter from your office dated April 14, 2015.

Comments received from TAC are listed with corresponding responses listed below each comment. Comments presented for information purposes were also received and have been noted by the proponent (City of Winnipeg).

1. Please identify the end disposal facility for each of the wastes listed in Table 1 of the proposal.
See attached Table 1B.
2. Does the proponent intend to install bollards around the aboveground used oil tank to prevent damage to the tank?
The above ground used oil tank will be inside the building (see revised Figure 2, attached); it is expected that the building will prevent damage to the tank.
3. What is the proposed method of disposal for the spilled material, runoff, snowmelt, or rainwater collected in the sump/catch basin area?
The sump provides 380 litres of storage, and includes a "drain guard" to filter sediment and maintain sump capacity. The liquid in the sump flows will be removed by a vac truck (vactor) and sent to an appropriate facility (e.g. Miller Environmental for chemicals, Green for Life for hydrocarbons). Spill kits will also be strategically located at the facility to mitigate migration of spills that may occur.
4. What is the protocol for accepting materials at the site? Are there any materials that will be considered unacceptable?
Customers will be greeted by staff, and drop-off items will be reviewed prior to being accepted. Training will be provided to staff to understand which materials are accepted. Only materials listed in the proposal will be accepted at the site.

1558 Willson Place
Winnipeg, Manitoba
Canada
R3T 0Y4
Telephone
204.453.2301
Fax
204.452.4412

May 5, 2015

5. What equipment will be utilized in the HHW building? Where will it be stored/maintained when not in use?
A hand-jack will be utilized in the HHW building. The hand-jack will be stored either in the maintenance building at the BRRMF, or in the HHW building ("under" one of the pallets).
6. Please identify what will be used for the "drain guard" and how it will be monitored/maintained?
Product information sheet attached. Drain guard will be "inspected" on a monthly basis, or when spills are evident around the sump. The drain guard fabric will be replaced in accordance with manufacturer recommendations.
7. The proponent will be required to update their HW generator registration information to include additional wastes identified in the proposal.
HW generator registration information is in the process of being updated (see attached form).

In addition, we are proposing to install the used oil tank inside the HHW building rather than on the outside, as requested by the Manitoba Association for Resource Recovery Corp. (MARRC). The revised layout of the building is shown on Figure 2 (attached). We are currently in discussion with the City of Winnipeg regarding building and occupancy permits for the HHW building based on the proposed revised design. Furthermore, a Fire Safety Plan in conformance with Section 2.8 of the Manitoba Fire Code will be submitted to the Winnipeg Fire Department.

Please feel free to contact me if you have any questions.

Yours sincerely,

DILLON CONSULTING LIMITED



Ash Raichura, P.Eng.
Project Manager

ARR/bk

Attachments: Hazardous Waste Registration Form
Table 1B – List of Destinations for HHW Received
Table 1C – Waste Description Table for Hazardous Waste Registration Form
Figure 2 – HHW Building floor plan (revised)
Drain Guard product information sheet

cc. Alexander Singbeil, City of Winnipeg

GENERATOR REGISTRATION AND CARRIER LICENCING REGULATION M.R. 175/87



HAZARDOUS WASTE REGISTRATION FORM

Check all that apply: New Company Name Change Moved Additional Site Update

Section 1 Generator Identification

Generator (Legal Name): City of Winnipeg Corp. File # if app.: MBG13146
 Mailing Address: 1120 Waverley Street City: Winnipeg Prov. MB Postal code R3T 0P4
 Operation Name: 4R Winnipeg Depot Site Location: Brady Road Resource Management Facility
 Operation Mailing Address: Same City _____ Prov. _____ Postal Code _____

Section 2 Waste Description

Physical state	TDG Shipping name	UN Number	TDG Class	Packing Group	Provincial waste class code	Quantity generated per month	Frequency of generation	Treatment/disposal code
a)	see attached Table 1C							
b)								
c)								
d)								

Section 3 Waste Management Information

General business type Waste management facility - receipt of residential household hazardous waste
 Source of hazardous waste Residential drop-off
 Hazardous waste carrier(s) used see attached Table 1C
 Hazardous waste receiver(s) used see attached Table 1C

Section 4 Certification

I certify that the information provided on this form is correct and complete.

Signature of Contact Person with the Operation: Date (dd/mm/yy): 05-05-15
 Print Name of Contact Person: Ash Raichura, P.Eng. Position/Title: Consultant
 Telephone : 204-453-2301 Fax : _____

For departmental use only : MBG _____ Business Code _____ Form checked by _____ Region _____ Form processed by _____

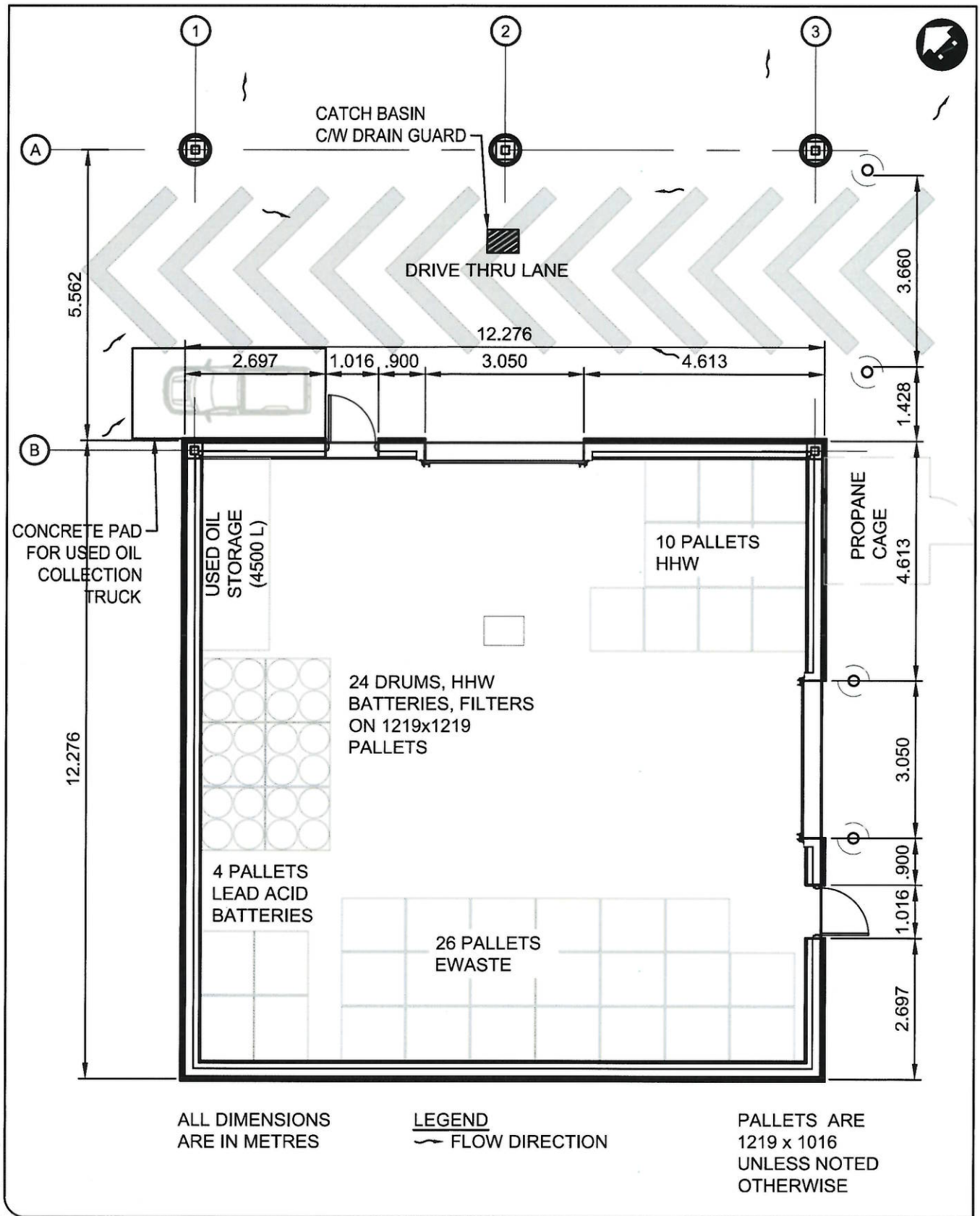
Personal information is collected under the authority of the Dangerous Goods Handling and Transportation Act, Generator Registration and Carrier Licensing Regulation M. R. 175/87, and will be used to issue the Hazardous Waste Registration Number (Provincial ID number) and for administration and enforcement purposes. It is protected by the privacy provisions of The Freedom of Information and Protection of Privacy Act. If you have any questions, contact the Access & Privacy Co-ordinator, Box 85, 200, Saulteaux Crescent, Winnipeg MB R3J 3W3; 1 (204) 945-4170.

Table 1B: List of Destinations for HHW Received

HHW	Estimated Quantity	Units	Estimated Frequency of Removal	Destination	PRO
Paint	170,000	Litres	Weekly	Miller Environmental	PCA
Flammable liquids	15	Tub skids	Weekly	Miller Environmental	PCA
Used oil	75,000	Litres	Semimonthly	Miller Environmental	PCA
Used oil filters	2,000	Units	Semimonthly	Licensed oil recycler - likely Green for Life	MARRC
Flammable gas				Miller Environmental	PCA
Non-Program Cylinders (propane, Freon, medical oxygen, etc.)	1,000	Cylinders	Monthly	Miller Environmental	Green MB through agreement with PCA
Toxics and non-regulated				Miller Environmental	
Toxic materials	20	Drums	Weekly	Miller Environmental	Green MB through agreement with PCA
Compact fluorescent bulbs	40,000	Bulbs	Weekly	Miller Environmental	PCA
Fluorescent tubes	20,000	Tubes	Monthly	Miller Environmental	PCA
Sharps (syringes, lancets)	1	kg	Bi-weekly	Stericycle	PRO involvement TBD
e-Waste	400	Tonnes	Bi-weekly	Exner E-Waste Processing Inc.	
Corrosives				Miller Environmental	Green MB through agreement with PCA
Corrosive materials	15	Drums	Weekly	Miller Environmental	Green MB through agreement with PCA
Automotive batteries	25	Tonnes	Monthly	Gerdau	
Lead Acid Batteries	20	Tonnes	Month	Gerdau	

Table 1C: Waste Description Table for Hazardous Waste Registration Form

HHW Part	Physical State	Description	UN Number	TDS Class	Packing Group	Provincial Waste Class Code	Estimated Quantity generated per month	Units	Estimated Frequency of Removal	Hazardous Waste Carrier	Hazardous Waste Receiver
Paint	L	Waste Paint	1263	3	II	1451	14,170	Litres	Weekly	Miller Environmental	PCA
Flammable liquids	L	Waste Flammable Liquids, nos	1993	3	II	2311	1	Tub lids	Weekly	Miller Environmental	PCA
Used oil	L	Hazardous Waste (Oil)	N/A	N/A	N/A	252T	6,250	Litres	Semi-monthly	Miller Environmental	PCA
Used oil filters	S	Hazardous Waste (Oil Filters)	N/A	N/A	N/A	252T	170	Units	Semi-monthly	Licensed oil recycler - likely Green for Life	MARRC
Flammable gas	G	Waste Compressed Gas, Toxic, nos	1965	2.3	N/A	331I	80	Cylinders	Monthly	Miller Environmental	PCA
Non-Program Cylinders (propane, Freon, medical oxygen, etc.)											Green MB through agreement with PCA
Toxic materials	L	Hazardous Waste (Fluorescent Bulbs)	2810	6.1	II		2	Drums	Weekly	Miller Environmental	Green MB through agreement with PCA
Compact fluorescent bulbs	S	Hazardous Waste (Fluorescent Tubes)	N/A	N/A	N/A	148T	3,330	Bulbs	Weekly	Miller Environmental	PCA
Fluorescent tubes	S	Hazardous Waste (Fluorescent Tubes)	N/A	N/A	N/A	148T	1,670	Tubes	Monthly	Miller Environmental	PCA
Sharps (syringes, lancets)	S	Waste Infectious Substances, Affecting Humans	2814	6.2	RGII	312P	0.1	Kg	Bi-weekly	Starcycle	PRO involvement TED
e-Waste	S	Non Regulated	N/A	N/A	N/A	N/A	30	Tonnes	Bi-weekly	Essex E-Waste Processing Inc.	Green MB through agreement with PCA
Corrosives	L	Waste Corrosive Liquids, nos	1760	8	II	114C (Acid) / 122C (Alkali)	1	Drums	Weekly	Miller Environmental	Green MB through agreement with PCA
Corrosive materials (Acid or Alkali)	L	Waste Batteries, Wet, Filled With Acid	2794	8	III	112C	2	Tonnes	Monthly	Miller Environmental	Green MB through agreement with PCA
Automotive batteries	L	Waste Batteries, Wet, Filled With Acid	2794	8	III	112C	2	Tonnes	Monthly	Geclau	
Lead Acid Batteries	L	Waste Batteries, Wet, Filled With Acid	2794	8	III	112C	2	Tonnes	Month	Geclau	



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4R WINNIPEG DEPOT

FLOOR PLAN

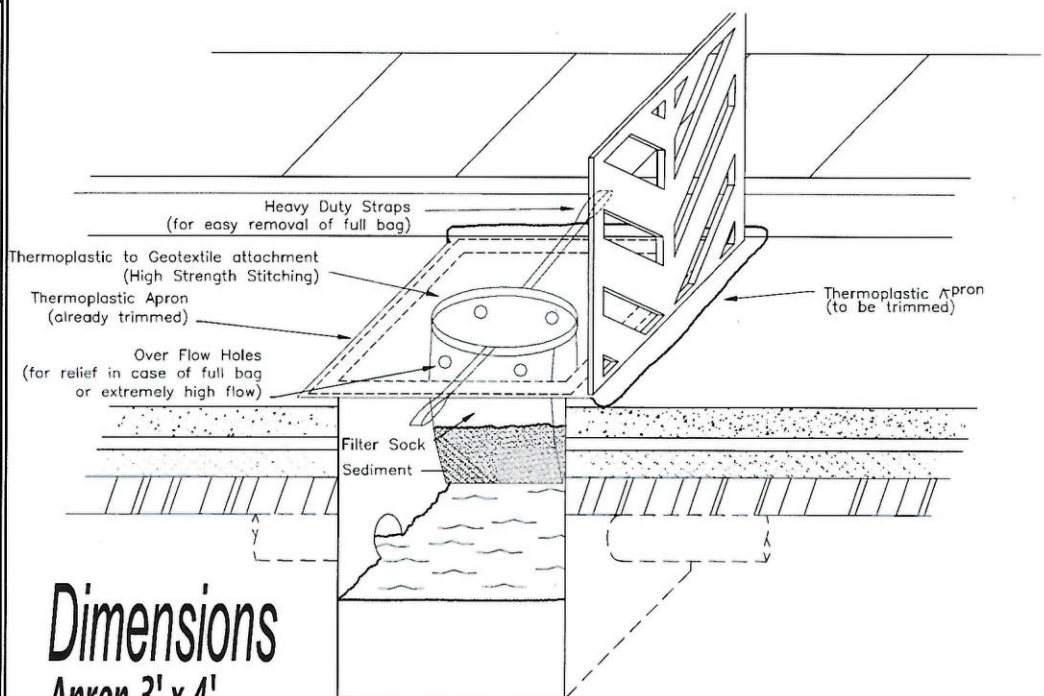
FIGURE 2

CATCH BASIN SEDIMENT TRAP

Catch Basin Sediment Traps protect our rivers and streams by capturing sediment and debris at storm water catch basins. This new design utilizes a water inlet and mounting apron that ensures maximum flow and allows for a professional looking and virtually invisible installation. Our standard filter material is a non-woven geotextile with built-in overflow ports for cases of abnormally high water flow or over-filled filter bags.

Installation Instructions

1. Unfold the Catch Basin Sediment Trap and locate the long straps on either side of the filter sock.
2. Remove grate and insert filter sock portion into catch basin. The apron will extend beyond the edges of the catch basin opening.
3. Extend the two straps underneath the apron until they reach beyond the apron and catch basin opening (see drawing).
4. Adjust the straps so only the short looped portion extends beyond the edge of the grate.
5. Install grate on top of the apron and straps.
6. Trim excess apron that extends beyond the installed grate using the grate edge as a trimming guide.
7. **Be careful not to cut off the straps while trimming apron**



Dimensions
 Apron 3' x 4'
 Filter Sock 16" dia. x 24" long

Removal Instructions

1. Before lifting the grate secure the CBST by standing on, or placing a bar through, the looped end of one of the straps.
2. Remove grate and lift out the CBST using both of the straps.
3. Dispose of the CBST according to local regulations and replace with a new CBST.

Filter Material Specifications

Mullen Burst	ASTM D 3786	400 PSI
Grab Tensile Strength	ASTM D 4632	200 LBS
Puncture Strength	ASTM D 4833	130 LBS
Trap Tear	ASTM D 4533	85 LBS
Water Flow Rate	ASTM D 4491	90 GPM/ft²
AOS	ASTM D 4751	80 US sieve (.18 mm)