Certificate of Registration

This is to certify that **QUASAR** *has registered the Quality Management System of:*

Miller Environmental Corporation

Head Office: 1803 Hekla Avenue, Winnipeg, MB R2R 0K3
Plant: P. O. Box 279, Hwy. 14 & 75, St. Jean Baptiste, MB R0G 2B0

to the Quality System Standard:

ISO 9001:2008

Initial Registration	Date of Issue	Date of Expiry	Certificate Number
18 July 2005	7 July 2011	18 July 2014	Q9217

Scope: Design and provide industrial waste management services

QUASAR

SCC Accredited CB-MS OCSM Accrédité CCN

Registrar

Registered by QUASAR Enregistrée par

Terms and Conditions governing registration and the use of this certificate are defined in the contract between QUASAR and the Holder.
Contact the certificate holder for further information related to the scope and boundaries of the registration.

3400E/2010-07 **QUASAR,** A Division of the CWB Group, 8260 Park Hill Drive, Milton, Ontario, Canada, L9T 5V7, Tel: 1-800-844-6790 / (905)-542-1312, Fax: (905) 542-1318, Web: www.cwbgroup.org

Certificate of Registration

This is to certify that **QUASAR** *has registered the Environmental Management System of:*

Miller Environmental Corporation

Head Office: 1803 Hekla Avenue, Winnipeg, MB R2R 0K3
Plant: P. O. Box 279, Hwy. 14 & 75, St. Jean Baptiste, MB R0G 2B0

to the Environmental System Standard:

ISO 14001:2004

Initial Registration:	Date of Issue:	Date of Expiry:	Certificate Number:
18 July 2005	7 July 2011	18 July 2014	Q9218

Scope: Design and provide industrial waste management services

SCC Accredited CB-MS OCSM Accrédité CCN

Registrar

Registered by QUASAR Enregistrée par

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3400E-14/2010-07 **QUASAR,** A Division of the CWB Group, 8260 Park Hill Drive, Milton, Ontario, Canada, L9T 5V7, Tel: 1-800-844-6790 / (905)-542-1312, Fax: (905) 542-1318, Web: www.cwbgroup.org

Certificate of Registration

This is to certify that **QUASAR** *has registered the Occupational Health and Safety Management System of:*

Miller Environmental Corporation

Head Office: 1803 Hekla Avenue, Winnipeg, MB R2R 0K3
Plant: P. O. Box 279, Hwy. 14 & 75, St. Jean Baptiste, MB R0G 2B0

to the Occupational Health and Safety Specification:

OHSAS 18001:2007

Initial Registration:	**Date of Issue:**	**Date of Expiry:**	**Certificate Number**:
23 June 2009	**7 July 2011**	**18 July 2014**	**Q9336**

Scope: Design and provide industrial waste management services

Registrar

Terms and Conditions governing registration and the use of this certificate are defined in the contract between QUASAR and the Holder.
Contact the certificate holder for further information related to the scope and boundaries of the registration.

3400E-18/2010-07 **QUASAR,** A Division of the CWB Group, 8260 Park Hill Drive, Milton, Ontario, Canada, L9T 5V7, Tel: 1-800-844-6790 / (905)-542-1312, Fax: (905) 542-1318, Web: www.cwbgroup.org

Waste Facility Declaration

I, an authorized individual responsible for environmental issues at the facility named below, certify that the information given in this document and in any documents attached is correct and complete, and fully discloses all applicable information available at the time of this environmental review.

Verifier Declaration

I, an authorized individual responsible for conducting the verification of this waste facility environmental review, certify that the information summarized in this document fully discloses all applicable information made available to me at the time of this environmental review. I further certify that I have read the Code of Ethics for the Canadian Environmental Auditing Association (CEAA), and have conducted myself in accordance with its direction.

Waste Facility Name	Miller Environmental Corp.	Company Name	QUASAR division of CWB Group
WFER Registration Number			
Authorized Individual	Vaughn Brough	Authorized Individual	Robert J. Partridge, P.Eng.
Title	VP & GM	Title	EMS Lead Auditor
Position		Professional Memberships & Qualifications	P.Eng, FEC, EMSLA
		Educational Background	B.A.Sc, M.Eng, MBA
Location	Winnipeg, MB	Location	Winnipeg, MB
Signature		Signature	
Date	April 07, 2010	Date	April 7, 2010

WCAR STRONGLY RECOMMENDS THAT VERIFICATION OF THE WFER FORM SHOULD BE COMPLETED BY AN INDIVIDUAL OR ORGANIZATION WITH A STRONG BACKGROUND IN ENVIRONMENTAL MANAGEMENT, ENVIRONMENTAL AUDITING AND/OR RISK ASSESSMENT. IN PARTICULAR, INDIVIDUALS WHO ARE CERTIFIED OR HAVE A PROFESSIONAL DESIGNATION (i.e., CEA, P. Eng. P. Biol.) FROM AN ORGANIZATION, WHICH HAS AN ENFORCEABLE CODE OF CONDUCT AVAILABLE IN THE EVENT OF UNSATISFACTORY PERFORMANCE, ARE RECOMMENDED.

Waste Receiver Assessment Program
Environmental Risk Assessment

Miller Environmental Corporation
Manitoba Environmental Centre

St. Jean Baptiste, Manitoba

NE 02-003-01 EPM

July, 2012

WRAP
WASTE RECEIVER ASSESSMENT PROGRAM

WRAP 2012 Report

Miller Environmental Corporation

P. Wotherspoon

Report Writer: Paul Wotherspoon

Report Reviewer: Kevin Young

Prepared by:

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www.wrapaudit.com

WEI Ref.: **2214-56**

Appendix 3.0 - Facility Assessment Protocol

Ref No.	Evaluation Criteria	Weighting	Rating	Score	Rating Guide
1.0	**REGULATORY AFFAIRS**				
1.1	**Permit Status**				
1.1.1	Does the facility possess required permits, approvals and licenses?	5	5	25	All permits, etc. in place and available at the facility, rating value: 5. If any permits are missing, rating value: 1.
Yes. The facility has a Dangerous Goods Handling and Transportation Act Licence for construction and operation of a central waste management facility # 58HW-S2-RR, re-issued October 15, 1997, no expiry but, at time of audit, was currently under re-write due to growth in business and upgraded processing capabilities. Hazardous Waste Receiver Licence #MBR01829; Hazardous Waste Generator Licence #MBG02410; and Hazardous Waste Provincial Carrier Licenses: Manitoba MBC00202, Saskatchewan SAC000320, Ontario A900297, Alberta ABC10569.					
1.1.2	Does the facility and the company meet all permit / approval conditions?	5	5	25	All approval conditions met, rating value: 5. Identified inconsistencies, outstanding issues rating value: 3. Several minor or major inconsistencies not addressed, rating value: 1.
Yes. Miller management reports that there have been no issues with respect to meeting all approval conditions by either Miller or Manitoba Conservation. The auditor reviewed all approval requirements with Miller personnel and reports no issues.					
1.2	**Violations**				
1.2.1	Has the facility been subject to environmental regulatory violations, investigations or infractions in the last 3 years?	5	5	25	If not, rating value: 5. If minor infractions have occurred and response was appropriate, rating value: 3. If many or major infractions and/or response not appropriate, rating value: 1. If there have been no visits, rating value: N/A
There have been no environmental regulatory violations, investigations or infractions in the last 3 years. The last formal Manitoba Conservation inspection was September 2008 with no identified issues. A "walk around" visit was conducted by Manitoba Conservation March 28, 2012 with no identified issues.					
1.2.2	Has the facility been subject to OHS / OSHA violations, investigations or infractions in the last 3 years?	4	5	20	If not, rating value: 5. If minor infractions have occurred and response was appropriate, rating value: 3. If many or major infractions and/or response not appropriate, rating value: 1. If there have been no visits, rating value: N/A.
There have been no OHS violations, investigations or infractions in the last 3 years according to interviewed personnel. The last inspection conducted by Manitoba Labour & Immigration, Workplace Safety and Health was conducted March 08, 2012 with no identified issues.					

Ref No.	Evaluation Criteria	Weighting	Rating	Score	Rating Guide
1.3	**Regulatory Liaison**				
1.3.1	Does the facility / company have established procedures for tracking regulatory changes?	3	5	15	Established procedures and dedicated staff that demonstrates proactive tracking, rating value: 5. Indication of informal or reactive system, rating value: 3. No system or dedicated staff, rating value: 1.
The site Operations Manager maintains regular communication with Manitoba Conservation. The technical services manager in the Winnipeg office is responsible for tracking regulatory changes and relaying that information to the MEC facility personnel. Facility land is owned indirectly by the regulator.					
1.3.2	Does the facility have an acceptable Liability Management Rating, as determined by the ERCB? This applies to ERCB licensed facilities only.	3	N/A	N/A	LMR is above industry average, rating value: 5. Between industry average and industry LMR Threshold (1.00), rating value: 3. Below Industry LMR Threshold, rating value: 1.
Manitoba facility. Not applicable.					
2.0	**FACILITY DESIGN**				
2.1	**Engineering Controls**				
2.1.1	Is the facility appropriately designed to control environmental risks?	5	5	25	Evidence of engineering systems to control releases to all potential receptors, rating value: 5. Receptors or risks not adequately identified or controlled, rating value: 3. No controls, rating value: 1.
Yes. Facility is reported to be underlain by 5 m of clay; groundwater monitoring program in place. All operations, including loading and unloading, are conducted inside process buildings. All waste operations are conducted on contained concrete areas with blind sump liquid collection areas including the storage tank farm. Surface water collection system in place. Vapour scrubber system in place on process flues. Wastewater filter press and reuse system in place. Alarm system on process and storage tanks.					
2.1.2	Is the facility designed using "best available control technologies (BACT)" to control environmental risks?	3	5	15	Evidence of new technologies and recognized state-of-the-art systems which are properly working and maintained, rating value: 5. BACT in use but not working or maintained, rating value: 3. No use of BACT, rating value: 1. Consider question in relation to other similar waste receivers that are available.
The MEC technologies are unique to the MEC operation and have been designed with the objective of BACT. There are engineered design and visual monitoring controls in place on all systems. All equipment was functional.					

Ref No.	Evaluation Criteria	Weighting	Rating	Score	Rating Guide
2.2	**Equipment Integrity**				
2.2.1	Are integrity monitoring systems adequate to control risks?	4	5	20	Evidence of functioning monitoring systems and backup systems to control tank volumes, leak detection, inventory control, high level and low level alarms and/or shutdowns, etc. that are maintained on a regular basis, rating value: 5. Systems with a combination of automated and manual controls, rating value: 4. Systems equipped with only manual controls (tank gauges, supervision), rating value: 3. No systems, rating value: 1.
Yes. Storage and process tanks have high level alarms followed by high level shutdowns. Tank farm provided with concrete secondary containment with blinded sump. Groundwater and soil monitoring system in place. Areas and processes which generate concentrated volatile or particulate emissions utilize 2 emission control systems designed to remove organic vapours and/or particulate and corrosives from the air stream (1 – sensor in scrubber flue for hydrocarbon emissions, and 2 – an inorganic wet scrubber). All reactor vessels and interior storage tanks for organics are vented through an activated carbon filter. The output of the filter is monitored continuously to determine when maximum loading capacity has been reached. The activated carbon is replaced when a breakthrough of volatiles occurs. All reactor vessels and interior storage tanks for inorganics are vented through a counter current flow wet scrubber. Moveable vent arms are used to collect volatile emissions, dust, and mists from: drums and tote tanks during material transfer bins and trays during material transfer and mixing; organic separator tank vents; organic sludge blender tank vent; and the acid reactor tank. There are no flares or vents present or required as part of the MEC operations. A meteorological data recording station is present in the southeast corner of the property which also records total hydrocarbon (THC).				
2.2.2	Is equipment sufficiently maintained?	4	5	20	Evidence of quality written procedures for all systems and a documented Preventative Maintenance (PM) program that includes scheduled maintenance and function testing, rating value: 5. Generic / boiler plate procedures, rating value: 3. No procedures, rating value: 1.
A Miller Preventative Maintenance program is in place which is currently being re-written to standardize and consolidate all the procedures. Inspection and maintenance checklists are completed and maintained on a daily, weekly and monthly schedule.					
2.3	**Closure**				
2.3.1	Does the facility have closure plans?	3	3	9	Quality plans that are complete or where required have been approved by regulatory bodies, rating value: 5. Closure plans are incomplete, rating value: 3. No plans, rating value: 1. This question applies regardless of a lack of regulatory requirements.
A preliminary decommissioning plan has been accepted by Manitoba Conservation. There is no required detailed plan until one year in advance of the projected date for commencing the decommission of the facility or when it becomes evident that the closure of the facility is imminent (as per Section 75 of the MBC Licence).					

Ref No.	Evaluation Criteria	Weighting	Rating	Score	Rating Guide
3.0	**FACILITY OPERATIONS**				
3.1	**Incoming Waste Confirmation & Quality Control**				
3.1.1	Does the facility have an adequate system for screening wastes for composition and quantity prior to acceptance?	5	5	25	For landfills, system that includes a hard data screening process (not visual verification), written procedures, analytical documentation, NORM gates or screening, waste manifesting, profiles, rating value; for TRD (liquids), sampling and analytical is conducted for every criteria for every load in addition to simply oil/water/solids cuts (relationship with generator NA): 5; Procedures in place for visual screening only, rating value: 4. Visual screening but no written procedures, rating value;: 3. No system or weak system, rating value: 1.
Yes. The facility has a documented Standard Operating Procedure (SOP) "Waste Verification and Sampling Procedure". All potential received wastes are characterized prior to acceptance into the MEC facility. Waste arriving at the facility is sampled and analyzed on-site for flash point, oil and grease, BTU value, ash content and water content of organic liquids, pH, alkalinity, and spot test for metals in inorganic wastes as required to provide confirmation of the waste stream. Information from the tracking document, sampling, and analysis are entered into a computerized inventory system (i.e. Enviroware).					
3.1.2	Does the facility have an adequate system to handle non-conforming wastes that are received?	4	3	12	Documented evidence of procedures (i.e. quarantine areas, documentation of incidents and non-conformance detection systems) designed to address non-conformance and evidence procedures are followed, rating value: 5. Partial system, including no documented process or evidence of rejected waste, but facility says they have rejected waste, rating value: 3. No system, rating value: 1.
Non-conforming waste loads are addressed on a case by case basis. Sales department will manage a return to generator if the waste cannot be handled on-site either due to process limitations or restrictions in the operating licence. However, in most cases, a revised waste profile is completed and the waste is handled by modifying the intended treatment process at site. Issues with non-conforming to supplied information is discussed with the generator and retained for on the generator's file. However, there is no documented procedure in place.					
3.1.3	Does the facility have an adequate system to monitor and track waste inventories?	3	5	15	System for filing consignment records and waste inventories and evidence they are maintained, rating value: 5. Partial system rating value: 3. No system rating value: 1.
All wastes are assigned a tracking number when they are received which can be traced through the entire treatment and disposal process. If wastes are bulked, individual tracking numbers are accumulated and tracked through to final disposal.					

Ref No.	Evaluation Criteria	Weighting	Rating	Score	Rating Guide
3.2	**Outgoing Waste / Materials**				
3.2.1	Does the facility have a waste management plan addressing wastes generated at the site (lube oils, coolants, solvents, etc), as well as transferred from the site to another site? Is there an evaluation process for the waste facilities this waste is sent to?	3	4	12	Facility has a written plan that includes formal evaluation of waste receivers, rating value: 5. Plan is in place, but there is no audit or evaluation of waste receivers, rating value: 3. No plan and no auditing of receivers, rating value: 1. If there are no additional waste facilities used, rating value: N/A. List other facilities used.
There is no formal waste management audit process of receivers of processed waste from MEC, however, both the utilized landfills, BFI and Mid Canada Soils have been visited by MEC operations personnel. On-site produced operational wastes are tracked via the accounting department.					
3.2.2.	Does the facility have an adequate system for tracking outgoing wastes (generated at site and being transferred)?	3	5	15	System includes filing records, manifests and sampling and testing of waste prior to sending to another waste facility, rating value: 5. If there is no tracking system for outgoing wastes or no testing of wastes, rating value: 3. If there is no tracking system and no testing of waste, rating value: 1. If there are no additional waste facilities used, rating value: N/A.
Movement documents (manifests are prepared for all outgoing wastes and records are maintained at site and entered into the Enviroware program tracks all outbound shipments.					
3.3	**Site Security**				
3.3.1.	Is the facility security system adequate?	3	5	15	Facility should have appropriate access control, security surveillance and barriers, rating value: 5. Some security, but weaknesses identified; if there have been issues in the past and there have been improvements made, rating value: 3. Site is not secure and/or history of break-ins within the past 3 years, rating value: 1.
The active area of the site is partially enclosed by a page wire fence. All buildings are secured by means of an alarm system tied into security monitoring system. The tank farm is enclosed with chain link security fencing. Current security alarm system consists of fire, hydrocarbon emission, and unauthorized building entry monitors.					

Ref No.	Evaluation Criteria	Weighting	Rating	Score	Rating Guide
3.4	**Worker Safety**				
3.4.1.	Does the facility have a documented and comprehensive safety program?	5	5	25	Evidence of a COR, or program that meets the elements of a COR (mgmt. involvement, hazard ID, assessment & control, ongoing inspections, qualifications, orientation and training, emergency response, accident/incident investigation, program administration.), rating value: 5. System contains most of the required elements of a good safety system, rating value: 4. System is non-existent or weak, rating value: 1.
The facility has received ISO 9001:2008, ISO 14001:2004, and OHSAS 18001:2007 certifications; all expire July 18, 2014. Safety meetings are conducted on a monthly basis. Safety Committee meets quarterly with 2 management reps and 3 employee reps. The accident / incident reporting system includes review, follow-up and sign-off that actions have been taken and procedural modifications have been made when necessary.					
3.4.2.	Does the safety program appear to be fully implemented or was there evidence of disregard or unsafe conditions?	3	5	15	Facility has all aspects of safety program implemented, rating value: 5. Some of the aspects of the safety program are not implemented, but most are, rating value: 3. Indication of unsafe acts, or not following safety program, rating value: 1.
The safety program appears to be fully implemented. There were no identified unsafe acts observed during the audit.					
3.4.3.	Does the facility have an acceptable accident / incident record?	4	5	20	No incidents or lost time accidents (LTA's) in the last year, evidence of declining injury rates in the past 3 years, and WCB experience ranking better than industry average, rating value: 5. Only minor incidents in last year with no LTAs, rating value: 4. High number of minor incidents or low number of LTAs, rating value: 2. High LTA frequency and/or WCB experience ranking below average, rating value or WCB rating not provided: 1. Note: WCB experience rating is different than verifying WCB coverage.
As of the date of inspection there had been no LTA's in the last 3 years. No incidents in at least the last 5 years. Miller is registered and in good standing with the Workers Compensation Board of Manitoba.					

Ref No.	Evaluation Criteria	Weighting	Rating	Score	Rating Guide
	Worker Competence				
3.5.1.	Are workers sufficiently trained?	4	5	20	Records showing evidence of extensive operations training or industry certifications, up-to-date safety and environmental training, permit awareness and demonstrated competence of staff, rating value: 5. Some basic safety training and acceptable level of competence, rating value: 4. Training in place but evidence of lapsed certificates, rating value: 3. No training, rating value: 1.
All workers have mandatory training in WHMIS, TDG, Confined Space, Chemical Safety, Fire Safety, Hazard Awareness, First Aid, and CPR. Emergency / spill and fire response training is provided as per the requirements of Section 2.8 of the National Fire Code. Employee records are maintained in a training database.					
3.6	**Environmental Risk Management**				
3.6.1.	Does the facility have an adequate audit program or otherwise to ensure compliance and continuous improvement?	3	5	15	Evidence of formal program (including daily/weekly/monthly inspections and annual audits), tracking and acting on recommendations, rating value: 5. Internal inspection program only but issues are acted on, rating value: 4. Inspections conducted but no actions taken, rating value: 3. No program, rating value: 1.
Miller has completed ISO 14001, 9001 & OHSAS 18001 audits; the most recent completed in 2011. An internal environmental audit is completed annually by Miller (last dated October 2011). Routine daily process and storage inspections are completed and documented.					
3.7	**Emergency Management**				
3.7.1.	Does the facility have an adequate and up-to-date ERP (Emergency Response Plan), SPCC (Spill Prevention Control and Countermeasure Plan) and / or RMP (Risk Management Plan)?	4	5	20	A quality and up-to-date ERP including spill response plans (including spill coop membership) in the hands of all staff and regular drills, rating value: 5. An adequate ERP with drills but lacking spill response plans, rating value: 4. ERP deficiencies and/or no drills, rating value: 2. No ERP, rating value: 1. If drills are required by regulation and they are not complete, rating value: 1.
The facility has a comprehensive emergency response plan in place. The last update was dated December 2011. The last drill was completed in 2011. Sirens are tested monthly. The facility has also prepared the document "External Agency Emergency Response Facility Information" with the objective to provide incident responders to the MEC with appropriate information to develop an effective response to an incident.					

Ref No.	Evaluation Criteria	Weighting	Rating	Score	Rating Guide
3.8	**Fire Safety**				
3.8.1.	Does the facility have an adequate fire management program?	4	5	20	A written plan, possibly part of the ERP, with fire control/detection devices, fire fighting equipment, contingency plans and available resources, rating value: 5. Partial plan and systems and/or history of fires, rating value: 3. No plan and/or severe or frequent fires, rating value: 1.
A fire protection program is contained in the Miller Environmental Management System. Fire extinguishers are located throughout the facility. The transfer station PB4 building has a fire suppression system in place that consists of a nitrogen based foam suppression system that includes a 3,000 L water tank and several nitrogen tanks. Muster stations are located at the north and south facility entrances to the site. Fire annunciator panels are present in the east side office areas. The local department last toured the facility in May 2011 and are scheduled for January 2013.					
3.9	**Storage**				
3.9.1.	Is facility housekeeping acceptable?	5	5	25	Exemplary housekeeping, rating value: 5. Adequate/good housekeeping - wastes and equipment stored neatly, minimal debris, rating value: 4. Housekeeping deficiencies, rating value: 2. Poor housekeeping, rating value: 1.
The facility is maintained in an acceptable manner with all wastes segregated and labelled. Drums and pallets were adequately spaced. There were no areas of extraneous material storage. Interior office areas were neat and organized.					
3.9.2.	Are wastes and other materials on-site stored in accordance with ERCB D55, AENV requirements, Fire Code, RCRA or other applicable regulations?	5	3	15	Meets all storage requirements, rating value: 5. Minor storage inadequacies, such as WHIMS labels, rating value: 4. More significant inadequacies (Fire hazards (weeds, etc.), no drip catchers, inadequate or no grounding cables, etc), rating value: 3. Poor or no containment, or free product in containment, rating value: 1.
The concrete floors, curbs, ramps and blind sumps provide secondary containment within the buildings. The tank farm has concrete secondary containment with a blinded sump; containment floor is sealed to the concrete walls. A fuel storage tank in the PB2 building is single wall with no immediate secondary containment at the tank's location.					

Ref No.	Evaluation Criteria	Weighting	Rating	Score	Rating Guide
3.10	**Transportation**				
3.10.1.	Does the facility have any Highway Traffic Act, DOT or TDG Act infractions, or incidents associated with transportation to or from the site?	2	5	10	If not, rating value: 5. If some infractions have occurred and response was appropriate, rating value: 3. If many infractions and/or response not appropriate, rating value: 1. If no company-owned vehicles, rating value: N/A.
Miller owns and operates its own transport vehicles including trailer and tractor units, vans, pickups, back hoes, vacuum trucks and lift trucks. There have been no Highway Traffic Act, DOT or TDG Act infractions, or incidents associated with transportation to or from the site.					
3.10.2.	Does the facility have an adequate program to manage employee and contract vehicles on the location?	1	5	5	Evidence of adequate roadways, monitoring/managing traffic on-site, cleaning, inspection procedures and access control, rating value: 5. Partial controls, rating value: 3. No controls, rating value: 1.
All vehicles are required to check into the office and have manifests verified prior to off-loading any waste products. There is no unsupervised loading or off-loading. Directional signs are provided throughout the facility.					
3.11	**Disposal Wells**				
3.11.1	Does the facility monitor disposal well integrity and testing requirements?	4	N/A	N/A	Evidence of annual/permit scheduled well testing, rating value: 5. Irregular well testing, rating value: 3. No testing, rating value: 1.
There are no disposal wells associated with the MEC facility. Miller utilizes contractor disposal wells.					
3.11.2	Have there been any disposal well issues, including packer or casing failures?	4	N/A	N/A	No evidence of packer or well bore integrity failures, rating value: 5. Downhole failures but adequate follow up with no reservoir or groundwater issues, rating value: 3. Downhole failures with impacts to reservoir or groundwater, rating value: 1.
Not applicable.					

Ref No.	Evaluation Criteria	Weighting	Rating	Score	Rating Guide
3.12	**Pipelines**				
3.12.1	Does the facility have pipelines that run off-site to disposal wells or other facilities? Does the facility have on-site pipelines? Does the facility have a pipeline integrity management plan?	4	N/A	N/A	Onsite pipelines only with a comprehensive integrity management plan, rating value: 5. Offsite pipelines (and onsite pipelines) with a comprehensive integrity management plan, rating value: 4. Offsite and/ or onsite pipelines but no integrity management plan, rating value: 1. No pipelines, rating value: N/A.
There are no pipelines associated with the MEC facility, neither on-site or off-site.					
3.12.2	Have there been any offsite pipeline failures in the past 5 years?	4	N/A	N/A	No pipeline failures in past 5 years, rating value: 5. Minor pipeline failure with full remediation, rating value: 4. Pipeline failure with incomplete remediation, rating value: 2. Major pipeline failure, rating value: 1.
Not applicable.					
3.12.3	Does the facility implement all components of the pipeline integrity program (including onsite and offsite pipelines)?	4	N/A	N/A	Facility has a fully documented and implemented integrity management program, rating value: 5. Written plan in place but not well managed, or well managed unwritten plan, rating value: 3. No management plan, rating value: 1.
Not applicable.					

Ref No.	Evaluation Criteria	Weighting	Rating	Score	Rating Guide
4.0	**FINANCIAL & INSURANCE**				
4.1	**Financial Strength**				
4.1.1	Does the Company have a sufficient net asset base to absorb the cost of environmental liabilities?	3	N/A	N/A	Trend of assets net liabilities greater than $5 million, rating value: 5. $1-$4 million, rating value: 3. Less than $1 million, rating value: 1. If no verified information provided, rating value: N/A.
Miller has been in business since 1996 and partners with the Manitoba Hazardous Waste Management Management Corporation. Miller is a private company that is not required to disclose financial information.					
4.1.2	Does the Company possess adequate financial security for facility closure?	5	1	5	This question applies regardless of a lack of regulatory requirements. Evidence of closure cost estimates that match closure financial security and considers environmental clean-up costs, rating value: 5. No evidence of closure costs estimates, but financial security is in place, rating value: 3. No security, rating value: 1.
Closure security is not required under their license. The site is owned by the Province of Manitoba who will ultimately assume liability for the site after closure. The facility operates as a joint venture with the Province.					
4.2	**Insurance**				
4.2.1	Does the facility have adequate environmental impairment liability or pollution liability insurance?	5	5	25	Evidence of up-to-date environmental impairment insurance in place for ≥ $1 million, rating value: 5. Pollution liability insurance in place for ≥ $1 million, rating value: 4. Insurance for less than $1 million, rating value: 3. No impairment insurance or policy out-of-date, rating value: 1.
Miller has Environmental Impairment Liability insurance with a coverage limit of $10,000,000.					
4.2.2	Does the facility have adequate comprehensive general liability insurance?	3	5	15	Evidence of up-to-date insurance in place for ≥ $2 million, rating value: 5. Insurance for less than $2 million, rating value: 3. No insurance or policy out-of-date, rating value: 1. Include values of other insurance within commentary (umbrella insurance, contractor insurance, etc)
Miller has Comprehensive General Liability insurance with a coverage limit of $10,000,000.					
4.2.3	Does the facility have adequate vehicle liability insurance?	3	5	15	Evidence of up-to-date insurance in place for ≥ $1 million on any company vehicle, rating value: 5. Insurance for less than $1 million, rating value: 3. No insurance or policy out-of-date, rating value: 1. N/A if no company owned vehicles.
Miller has Auto third party liability insurance with a coverage limit of $10,000,000.					

Ref No.	Evaluation Criteria	Weighting	Rating	Score	Rating Guide
4.3	**Waste Ownership**				
4.3.1	Does the facility contractually accept ownership of the waste it receives?	4	3	12	Facility contractually accepts ownership of all waste via contract with company, rating value: 5. Facility accepts ownership through non-specific blanket agreement (i.e., general claim that facility accepts ownership in documentation, but no agreement with individual companies), rating value: 3. No written acceptance or facility does not accept ownership of waste, rating value: 1.
Miller accepts ownership of the waste once received but there are no specific contractual arrangements.					
5.0	**ENVIRONMENTAL IMPACT**				
5.1	**Setting**				
5.1.1	Is the site proximate to any sensitive areas?	3	2	6	If within 100m of rivers, wetlands, parks, recreational areas, residential development, intensive livestock operations, within a flood plain, etc., rating value: 2. Facility proximate to sensitive areas but risks are adequately controlled and monitored, rating value: 3. If facility is not proximate to any of the above, rating value: 5.
The facility is geographically located just within the Red River (3 km east) 100 year flood plain; however it was reported that the site itself sits 1 metre freeboard (Manitoba flood protection guidelines required that new developments be constructed to the 1 in 100 year flood elevation level plus a minimum allowance of 0.6 m freeboard).					
5.1.2	Are there any known or observed potential environmental issues from adjacent properties?	3	5	15	The facility has no neighbours that have an observed environmental problem or monitoring reports show there is no contamination from neighbouring sites, rating value: 5. Neighbouring sites have an observed potential contamination risk, but no known impact; or facility has implemented protection measures (e.g.. run-on protection), rating value: 3. There is contamination coming onto the site from adjacent properties, rating value: 1.
There are no environmental issues related to adjacent properties.					
5.1.3	Have community members submitted complaints against the facility within the past three years? Complains may include dust, trucking, noise, odours, etc.	3	5	15	Evidence of a complaint tracking system with no complaints received, rating value: 5. Some complaints but evidence that they have been resolved and documented, rating value: 3. Several outstanding complaints or known complaints are not documented, rating value: 1.
There have been no complaints filed against the facility. The facility is an active member of the local business community.					

Ref No.	Evaluation Criteria	Weighting	Rating	Score	Rating Guide
5.2	**Water**				
5.2.1	Are there any drinking water sources (surface or groundwater) within 0.5 km / 0.31 miles of the facility?	3	5	15	If no, rating value: 5. If between 0.5 km and 0.25 km (.15 mile) and are adequately monitored or water testing, rating value: 4. If sources are within 0.25 km and are adequately monitored or tested, rating value: 3. If no controls in place within 0.5 km of drinking water source, rating value: 1.
There are no reported drinking water sources within 0.5 km of the facility. Local area residents utilize the Pembina Valley Water Co-op.					
5.2.2	Does shallow groundwater exist under the facility?	4	3	12	Groundwater is >6.09 metres (20 feet) bgs (below ground surface) and risks are controlled and monitored, rating value: 5. If between 6.09 and 3.05 metres (20 - 10 feet) bgs, or greater than 6.09m and risks not controlled, rating value: 3. If < 3.05 meters (10 feet) bgs, rating value: 1. NA if no groundwater monitoring required/conducted and elevation unknown.
The groundwater table ranges from 3 to 5 meters below ground surface according to the latest groundwater monitoring report.					
5.2.3.	Is on-site stormwater managed to prevent off-site contamination?	4	5	20	A system of diversion trenches, culverts, berms/ponds that prevent off-site migration and appropriate testing before pump-off, including landowner notification, rating value: 5. Partial system of diverting surface water and testing conducted, rating value: 3. No runoff control or documented testing before pump off, rating value: 1. If there is no outdoor storage or handling of waste - ALL operations take place indoors, including truck loading/unloading, rating value: N/A.
The stormwater collection system is directed to on an on-site pond. The pond is sampled and approved by Manitoba Conservation before pump-off which normally occurs only once per year.					
5.2.4.	Were there records of or observations of surface or groundwater contamination?	5	5	25	No visible indication or any records indicating water contamination, rating value: 5. History of contamination, but evidence of complete remediation, rating value: 4. On-going contamination problem and/or several incidents of historical contamination, rating value: 1. NA if no groundwater monitoring required/conducted and analysis unknown.
There has been no indication of surface or groundwater contamination at the facility. There are 32 groundwater monitoring piezometers that are sampled twice per year.					

Ref No.	Evaluation Criteria	Weighting	Rating	Score	Rating Guide
5.3	**Air**				
5.3.1	Does the facility produce air emissions that can impact air quality?	2	4	8	No significant emission sources, rating value: 5. Approved and reported periodic sources of fugitive emissions (tank vents, soil pads, etc.) or periodic point sources (emergency flare, back-up generator, etc.), rating value: 4. No H_2S, but approved continuous emissions from more than one source (boiler, treater, fire vessels or tanks), rating value: 3. Significant emissions from a continuous source (incinerator or flare) and/or the facility processing/handling H_2S waste, rating value: 1.
The exterior organics storage tanks and interior organics process tanks are vented to the atmosphere. All non organic emissions pass through a wet scrubber. LEL monitors are in place in the process PB1 and the transfer station buildings.					
5.3.2	Does the facility have an adequate program to minimize air emissions?	3	5	15	Evidence of procedural, operational and engineering controls such as VRU's, flare performance enhancements, odorants, scrubbers, etc. rating value: 5. Some emission sources addressed but not all, or a lack of procedural or operational controls, rating value: 3-4. Limited or no control of air emissions, rating value: 1-2. No emissions source, rating value: N/A.
Non-organic storage tank vapours go through a series of scrubbers before being vented to atmosphere. Separate scrubber systems are used for the organic and inorganic vapours, other than the organic storage outside.					
5.4	**Soils**				
5.4.1	Does the facility have a soils monitoring program?	1	5	5	Approval required program that includes annual monitoring of soil quality for relevant parameters, and no evidence of significant soil impacts, rating value: 5. Program required but evidence of un-remediated soil impacts, rating value: 3. Risk to soils, but no monitoring program, rating value: 1. If not required or very low risk, rating value: N/A.
Soils are sampled at three sites twice per year. Samples are obtained from the top 10 cm of soil to measure the impact of any surface dispoition.					
5.4.2	Is there, or has there ever been any indication of soil contamination?	4	5	20	No visible signs and no history of contamination, rating value: 5. Identified and delineated contamination, but remediation in progress, rating value: 3. Evidence of significant soil impacts and no remedial response, rating value: 1.
Soil tests to date do not indicate any environmental impact due to the facility.					

Ref No.	Evaluation Criteria	Weighting	Rating	Score	Rating Guide
5.5	**Vegetation**				
5.5.1	Is there a vegetation control program in place for the facility?	2	5	10	A program to minimize vegetative growth (that does not include sterilants) inside tank berms, loading areas, and other fire prone areas; and no denuded vegetation outside the facility boundary, rating value: 5. No program or persistent sterilants used, rating value: 1.

Lands that surround the facility on the MEC property are mowed by a local farmer for hay. Any interior grasses surround the buildings are mowed. Herbicides are only applied at fence line, no pesticides or herbicides are used on-site.

Scoring Summary

Overall Total Score	721
Overall Total Possible Score	795
Overall Percentage	90.69%
Overall Rating	5
Regulatory Affairs	100.00%
Facility Design	93.68%
Facility Operations	93.11%
Financial & Insurance	72.00%
Environmental Impact	89.73%

Overall Rating Scale

1: <= 50%
2: 50 - 64.9%
3: 65 - 74.9%
4: 75 - 84.9%
5: 85 - 100 %

Appendix 4.0 - Scoring Guide

Scoring Guide

The WRAP consortium (i.e. the participant waste generators) has assigned each evaluation criteria's question in the scoring protocol a "*weighting*" on a scale of 1 to 5. The "*weighting*" defines the importance of a particular issue relative to the other issues with 5 being the most important.

A "*rating*", on a scale of 1 to 5, is assigned to each issue for the facility's assessed performance of that issue. The rating is based on the assessor's documentation review, visual observations, and communications (i.e. testimonials) with facility and corporate personnel. The rating values are based on the subjective judgment of the assessor. The relative rate associated with each issue is an opinion of its impact on the risk management evaluation with respect to the protocol's rating guide. Questions deemed "*Not Applicable*" to a particular facility are removed from the "*Total Score Possible*" calculation.

The rating is then multiplied by the weighting of that particular issue, which provides a score for that issue. Taking the sum of all of the issue scores, divided by the "Total Score Possible" (x 100) provides the final score percentage and rating.

The final rating system is defined as follows:

5 Facility is designed and managed to control risks to the environment. Safety, emergency response and fire management programs are well designed and implemented at all levels of the organization. The company has complete insurance coverage, closure security and sufficient net asset base to absorb any environmental clean-up costs.

4 Although not "state-of-the-art", systems are adequately designed and operated to control environmental risks. The facility may have some contamination issues, but appropriate measures are being taken to address the problems and eliminate further problems. Insurance, closure security and the net asset base of the company provide adequate protection for waste generators.

3 The facility may have some design problems and possibly incomplete integrity control systems. The facility may have contamination issues that have not been quantified. The company has some insurance, but coverage may not be complete. Operational problems such as poor housekeeping, weak safety programs and emergency response systems may also be evident. In general, the facility meets a baseline level of quality, but generators should exercise some degree of caution when using these options.

2 The facility either has a significant weakness such as inadequate insurance, permit noncompliance, or contamination problems, or they demonstrate sub-par performance in a number of areas. Facilities that receive this rating require significant and immediate improvement to control risk. Generators should exercise a high degree of caution in using these facilities.

1 The facility has one significant or several "red flags" that could possibly impact waste generators. The "red flags" include operating without a permit, several regulatory violations, poor safety performance, severe contamination with risk to receptors, and no insurance and/or minimal net asset base.

Dave Howes

From: customerservice@isn.com
Sent: Tuesday, December 11, 2012 5:38 PM
To: daveh@millerenvironmental.mb.ca
Cc: joelc@millerenvironmental.mb.ca; vaughnb@millerenvironmental.mb.ca
Subject: Thank You for Your Company's ISNetworld Subscription Renewal: Miller Environmental Corporation

Miller Environmental Corporation,

We have received your company's annual ISNetworld (www.isnetworld.com) contractor/supplier subscription payment and your company's on-line subscription has been renewed with a renewal date of Jan 09, 2014. Thank you for your business.

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