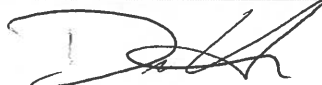


# Notice of Alteration Form



Client File No. : 5230.00		Environment Act Licence No. : 211 HW R	
Legal name of the Licencee: Miller Environmental Corporation			
Name of the development:			
Category and Type of development per Classes of Development Regulation: Waste Treatment and Disposal                      Holding tanks >10,000/day			
Licencee Contact Person: Dave Howes Mailing address of the Licencee: 1803 Hekla Ave. City: Winnipeg                      Province: MB                      Postal Code: R2R 0K3 Phone Number: (204) 925-9604   Fax: (204) 925-9601   Email: daveh@millerenvironmental.mb.ca			
Name of proponent contact person for purposes of the environmental assessment (e.g. consultant): Same as above			
Phone:		Mailing address:	
Fax:			
Email address:			
Short Description of Alteration ( <i>max 90 characters</i> ): Review of clauses 18, 30 & 51 currently being completed by Sustainable Development.			
Alteration fee attached:   Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>			
If No, please explain: Alterations initiated by Miller Environmental & Environmental Approvals Branch			
Date: 2017-03-20		Signature: 	
		Printed name: Dave Howes	
<p>A complete Notice of Alteration (NoA) consists of the following components:</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Cover letter</li> <li><input checked="" type="checkbox"/> Notice of Alteration Form</li> <li><input type="checkbox"/> 4 hard copies and 1 electronic copy of the NOA detailed report (see "<a href="#">Information Bulletin - Alteration to Developments with Environment Act Licences</a>")</li> <li><input type="checkbox"/> \$500 Application fee, if applicable (Cheque, payable to the Minister of Finance)</li> </ul>		<p><b>Submit the complete NOA to:</b></p> <p>Director Environmental Approvals Branch Manitoba Sustainable Development Suite 160, 123 Main Street Winnipeg, Manitoba R3C 1A5</p> <p><b>For more information:</b></p> <p>Phone: (204) 945-8321 Fax: (204) 945-5229 <a href="http://www.gov.mb.ca/sd/eal">http://www.gov.mb.ca/sd/eal</a></p>	



**Miller Environmental Corporation**

1803 Hekla Avenue  
Winnipeg, Manitoba R2R 0K3  
Tel. (204) 925-9600 Fax (204) 925-9601

*Committed to Leadership in Our Industry*

March 20, 2017

Manitoba Sustainable Development  
Environmental Approvals  
2<sup>nd</sup> Floor, 123 Main Street (Box 80)  
Winnipeg, MB R3C 1A5

Attn: Tracey Braun, M. Sc. – Director Environmental Approvals Branch

Dear Ms. Braun:

RE: Notice of Alteration to License DGHTA No. 211 HW R

Please accept this as Miller Environmental Corporation's (Miller) notification of alteration to the issued Dangerous Goods Handling & Transportation Act License No. 211 HW R. Miller met with Sustainable Development on January 13, 2017 to discuss specific clauses from the newly issued licence. There were clauses that required clarification and modification to ensure Miller remained in compliance. From this meeting, it was identified that clauses 18, 30 and 51 required modification based on the details below. Attached with this letter is Miller's Notice of Alteration Form to initiate the required changes to these three clauses.

**Manitoba Household Hazardous Waste Stewardship Program Materials**

**Clause 18** – The Licencee shall receive and store household hazardous wastes that are identified as program materials and non-program products under the Manitoba Household Hazardous Waste Stewardship Program in accordance with the most current version of the Manitoba Product Care Collection Site Guidelines and this Licence.

- Miller does not operate directly to the Product Care Collection Site Guidelines (guideline) when it comes to managing waste received from the public for this program. The guideline is written for new collection depots to assist with chemical segregation, depot setup and security, etc. While Miller follows the guideline, operating procedures exceed the guideline requirements based on knowledge of chemical handling and segregation. Miller does not want this clause to limit our collection processes and program management based on the guideline details. This will create operating confusion when having to reference only the guideline details. Miller is requesting to remove this clause.

## Facility Security

**Clause 30** - The Licencee shall equip the Facility with a security system to detect intrusion, and a fire detection system in all storage, handling and laboratory areas. Alarms must be monitored at a remote location and must be in good operating order at all times.

- Miller's warehouse and office have a monitored security system at a remote location. There are two secured (locked) intermodal containers on the Facility that are located within the secured, fenced compound but not monitored. One container stores hazardous waste collected from the Product Care Stewardship Program. This waste is segregated and labpacked into drums. The other container stores PCB waste as per the storage site approval letter from MB Conservation dated November 3, 2011. This waste is stored based on requirements specified in the Manitoba Regulation 474/88 along with Environment Canada PCB Regulations (SOR/2008-273) storage requirements. This clause is cost prohibited to add monitored alarmed security to these two storage locations. Miller would like this requirement removed from container storage locations on our site outside of our main building and warehouse.

## Storage of Lead Acid Batteries

**Clause 51** - The Licencee shall not allow the inventory of waste batteries at the Facility to exceed 750 waste lead acid batteries at any one time.

- Miller's restriction of 750 waste lead acid batteries at one time is sufficient when referring to lead acid automotive batteries. Lead acid batteries can also include other types of batteries such as UPS (uninterrupted power supply) batteries (ie: from computer server rooms, etc.). Miller can receive multiple containers of lead acid batteries from our processing facility or customers and will potentially store them at the Facility prior to disposal at a recycling facility. This clause needs to specifically identify the requirement for lead acid automotive batteries.

If you have any questions, please feel free to contact me at 204-925-9604 or by email at [daveh@millerenvironmental.mb.ca](mailto:daveh@millerenvironmental.mb.ca)

Sincerely yours,

**Miller Environmental Corporation**



Dave Howes  
Technical Services Coordinator