



January 20, 2025

Director
Environmental Approvals Branch
Manitoba Environment, Climate and Parks
Box 35, 14 Fultz Boulevard
Winnipeg MB R3Y 0L6

Dear Ms. Wittmann,

We write to provide notice of an intended alteration to Gerdau's existing Licence No. 291 HW (**Licence 291 HW**) issued December 8, 2015 under *The Dangerous Goods Handling and Transportation Act*, C.C.S.M. c. D12 relating to Gerdau's Dawson Road Collection and Transfer Facility (**Facility**). The Notice of Alteration report prepared by Dillon Consulting (**Dillon**) on behalf of Gerdau Ameristeel Corporation (**Gerdau**), which contains both the project description and effects assessment, is being submitted as draft for your review and comment. We will submit a final version once any comments have been received and incorporated.

At its Facility located at 314 Dawson Road North in Winnipeg, Manitoba, Gerdau currently receives and processes the following goods and materials:

- White goods (scrap appliances);
- Lead acid batteries;
- Tires; and,
- Used oil and filters (collectively, the **Existing Material**).

Gerdau is proposing to receive additional scrap and potentially hazardous material at its Dawson Road Facility from northern Manitoba communities through the Backhaul Project. Gerdau already participates in the Backhaul Project at its Selkirk location. The Backhaul Project was established to remove stockpiled stewardship and non-stewardship materials from communities in northern Manitoba and transport them to alternate locations for storage, recycling and/or disposal, as appropriate. This is accomplished by loading empty trucks with scrap material to be transported to receiving facilities such as the Facility. This not only diverts potentially hazardous and hard to dispose of materials from waste streams in northern communities, but also ensures that trucks are not hauling empty loads back from northern communities.

Gerdau would like to participate in the Backhaul Project at its Winnipeg site during the winter of 2024/2025, provided the appropriate licence alteration is granted, with the intent of continuing this partnership going forward.

Scrap material and potentially hazardous waste would be received at the Facility by the truckload and would largely include the Existing Material that Gerdau currently processes and would additionally include the following:

- Containers and items associated with used oil (i.e., pails, lids), stored on containment;
- Aerosols and propane tanks, to be palletted and only if punctured and drained;
- Paint pails, stored on containment;
- Electric Vehicle (**EV**) nickel metal hydride batteries;
- EV lithium-ion batteries; and,
- Electronics and lighting, to be palletted (collectively, the **Additional Hazardous Material**).

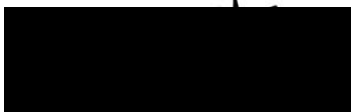
Gerdau anticipates that the Additional Hazardous Material will be stored on site for a brief period (if necessary and up to a maximum of 90 days) before being removed for further recycling or disposal. Materials removed from the Facility will be transported by licenced carriers to operations approved and equipped to receive hazardous waste, as appropriate.

In order to accommodate its participation in the Backhaul Project, Gerdau seeks amendments to definitions and Clauses 8, 16, 18, 20, and 22 of Licence 291 HW to permit it to receive, store, and reload the Additional Hazardous Material at the Facility.

For the following reasons, Gerdau believes that the proposed alteration is a minor alteration within the meaning of *The Environment Act*, C.C.S.M. c. E125. The enclosed report prepared by Dillon concludes that the human health and environment effects of the proposed licence alteration and Gerdau's participation in the Backhaul Project will be insignificant. Further, the Additional Hazardous Material to be received, stored, and reloaded will be contained within the footprint of existing Gerdau infrastructure and no additional equipment or infrastructure will be needed in order to support this endeavour.

We would be pleased to provide any other information that you may require. We kindly request that this application be considered at your earliest convenience and in any event by **January 24, 2025** such that Gerdau may be able to participate in the Backhaul Project during the current winter road season. Thank you very much for your attention to this application. We look forward to hearing from you.

Sincerely,
Aditya Bhatt
Environmental Manager

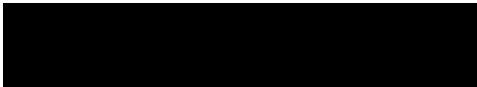


cc: Lindsay Warelis, TDS LLP
Heather Fisher & Dennis Heinrichs, Dillon Consulting
Kurt Doward, Manitoba Environment Officer

Notice of Alteration Form

Dangerous Goods Handling and
Transportation Act Licence



Client File No. :		DGH&TA Licence No. :	
Legal name of the Licencee:			
Name of the FACILITY:			
Type of Activity:			
Licencee Contact Person:			
Mailing address of the Licencee:			
City:		Province:	Postal Code:
Phone Number:		Fax:	Email:
Name of proponent contact person for purposes of the environmental assessment (e.g. consultant):			
Phone:		Mailing address:	
Fax:			
Email address:			
Description of Alteration (<i>max 150 characters</i>):			
Date:		Signature: 	
		Printed name: Johannes Mack	
A complete Notice of Alteration (NoA) consists of the following components:		Submit the complete NoA to: Director Environmental Approvals Branch Manitoba Environment and Climate 14 Fultz Blvd. Winnipeg, Manitoba R3Y 0L6 EABDirector@gov.mb.ca	
Cover letter Notice of Alteration Form 2 hard copies and 1 electronic copy of the reports/plans supporting the alteration to the facility		For more information: Phone: (204) 945-8321 Fax: (204) 945-5229 http://www.gov.mb.ca/sd/eal	



GERDAU AMERISTEEL CORPORATION

Notice of Alteration – Licence No. 291 HW

**Collection and Transfer Facility at 314 Dawson Road North,
Winnipeg**

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Introduction

Gerdau Ameristeel Corporation (Gerdau) has retained Dillon Consulting Limited (Dillon) to prepare documentation and provide an environmental effects assessment to support its request for an alteration to Gerdau's Licence No. 291 HW (Licence 291 HW), which was issued on December 8, 2015 under *The Dangerous Goods Handling & Transportation Act*, C.C.S.M. c. D12 (DGHTA). Specifically, the request relates to receiving, storing, and reloading hazardous waste currently not listed in Licence 291 HW at Gerdau's Waste Lead Acid Battery, Used Oil, Waste Flammable Liquids, and Mercury Switches Collection and Transfer Facility (Facility) located at 314 Dawson Road North in Winnipeg, Manitoba.

Clause 8 of Licence 291 HW currently authorizes Gerdau to receive only waste lead acid batteries, used oil, waste flammable liquids, and mercury switches from scrap automobiles at the Facility. This report is submitted to support Gerdau's request to amend Licence 291 HW such that it be permitted to receive, store, and reload additional hazardous waste and recyclables at the Facility, which it will primarily receive through participation in the Backhaul Project.

The sections below describe the Backhaul Project in greater detail, outline the requested amendments to Licence 291 HW, and provide an evaluation of potential environmental and human health impacts as a result of the proposed alteration.

Project Background

The Backhaul Project is operated by Manitoba's Producer Responsibility Organizations (PROs) and aims to remove stewardship material from participating remote First Nation Communities. The overarching goal of the Backhaul Project is to develop a model to efficiently remove stewardship and non-stewardship material from remote communities during the winter road season. To date, participating pilot communities have included those where local efforts have been made to divert recyclable material from landfill disposal or reduce end of life vehicle stockpiles (PRO Group, 2022).

The Backhaul Project finished its fifth year of operation in 2023/2024 and the following four (4) communities were involved: Lac Brochet, Sayisi Dene (Tadoule Lake), Bunibonibee Cree Nation (Oxford House), and Wasagamack First Nation. During the 2023/2024 winter road season, nine (9) semi-trailer loads of material (totaling approximately 56,517 kilograms) were removed from participating communities thus diverting recyclable and potentially hazardous materials from northern waste streams. A summary of the types and quantities of materials removed during the 2023/2024 Backhaul Project season is provided below in Table 1.

Table 1: Summary of Material Received during 2023/2024 Backhaul Project

Material Type	Approximate Total (kg)
Tires	20,400
White Goods (appliances)	31,860
E-Waste	2,500
Lead Acid Batteries	1,582
Fluorescent Tubes	175
TOTAL	56,517

Notes:

Cardboard bales, household recycling, and plastic bags not included in weight total as not provided.

Source: PRO Group, 2024 email correspondence.

During previous backhaul seasons, individuals in participating communities were hired to collect, sort, pack, and prepare stewardship and non-stewardship material for transport. The material was diverted from landfill disposal or collected during community clean-up projects, including projects to address accumulations of derelict vehicles and scrap appliances. Stewardship material included scrap tires, electronics, waste paint, residential cardboard, aluminum and plastic beverage containers, lead acid batteries, fluorescent lights, used oil, used oil filters, empty oil containers, and aerosol containers. Non-stewardship material included commercial cardboard, steel tire rims, scrap appliances (stoves, driers, washers, hot water tanks), and aluminum (PRO Group, 2022).

Gerdau already participates in the Backhaul Project at its Selkirk, Manitoba site pursuant to the approval of a similar alteration request to Licence No. 264 HW which was received by Gerdau in early February 2023. Due to Gerdau's existing capacity for material storage and scrap metal recycling, Gerdau is well-positioned as a sorting, storage and processing destination for transport trucks returning to Winnipeg from remote communities via the winter roads. Provided the requested amendments to Licence 291 HW are granted, Gerdau plans to expand their participation in the Backhaul Project during the 2024/2025 winter road season by adding the Winnipeg Facility as an additional location for receiving, storing, and reloading stewardship and non-stewardship materials. The backhauled materials from northern communities will be received at the Facility, stored for a short period of time, and reloaded for processing off-site, as required. Through its participation in the Backhaul Project, Gerdau aims to further support the responsible collection, recycling and recovery of stewardship and non-stewardship materials in the Province and divert waste from northern landfills.

During the 2024/2025 season, the Backhaul Project intends to use waste receivers to process and/or dispose of various materials, as follows:

- Gerdau – tires, tire rims, white goods (appliances), aluminum, waste lead acid batteries and aerosols (punctured and drained);
- Exner E-Waste Processing Inc. – Electronic waste;
- Miller Environmental Corporation – Paint and fluorescent tubes, used oil; and,
- Notre Dame Used Oil – Used oil, oil filters, empty pails, oil containers, and oil pail lids.

Also in 2024/2025, the Backhaul Project anticipates receiving and transporting fifteen (15) semi-trailer loads of materials from six (6) First Nation communities including Northlands Denesuline First Nation, St. Theresa Point First Nation, Wasagamack First Nation, Garden Hill First Nation, Bunibonibee Cree Nation, and God's Lake First Nation provided weather and winter road conditions permit access to these areas.

3.0

Project Description

3.1

Logistics

Gerdau's Facility on Dawson Road North in Winnipeg is currently authorized, pursuant to Gerdau's Licence No. 291 HW under the DGHTA, to receive some hazardous waste from scrap automobiles (i.e., waste lead acid batteries, used oil, waste flammable liquids, and mercury switches). Through its participation in the Backhaul Project, Gerdau anticipates receiving larger quantities of materials that it already receives and transfers at the Facility including:

- White goods (i.e., scrap appliances such as stoves, driers, washers, and hot water tanks);
- Lead acid batteries, to be stacked and stored in accordance with the current requirements of Licence 291 HW;
- Used oil and filters; and,
- Tires (collectively, the **Existing Material**).

Gerdau also anticipates receiving, storing, and reloading additional hazardous wastes and recyclables at the Facility, which are not currently contemplated by or authorized under Licence 291 HW including, but not limited to:

- Containers and items associated with used oil (i.e., pails, lids), stored on containment;
- Aerosols and propane tanks;
- Paint pails, stored on containment;
- Electric Vehicle (EV) nickel metal hydride batteries;
- EV lithium-ion batteries; and,
- Electronics and lighting, to be palletted (collectively, the **Additional Hazardous Material**).

The Existing and Additional Hazardous Material will be received, sorted, and stored for a short period of time (if necessary, and up to a maximum of 90 days), and reloaded for processing off-site if the material cannot be processed by Gerdau. No EV batteries are anticipated to be received through the Backhaul Project, however, Gerdau plans to expand its operations to include the proper recycling of EV batteries from other sources in the future.

Responsibilities for backhauled materials are anticipated to be as follows:

- Backhaul Project will assume responsibility during initial loading and transport via the winter roads up until the point of unloading at the Facility;

- Gerdau will assume responsibility for the handling and storage of materials only while on-site at the Facility (i.e. during the storage step from the point of unloading to the point of reloading). Gerdau expects to be provided with an inventory prior to receiving each backhaul load to minimize the possibility of receiving materials that cannot be accepted by Gerdau. Further, Gerdau employees trained in the handling of dangerous goods will inspect each backhaul load prior to unloading and after reloading at the Facility; and
- Backhaul Project will coordinate and assume responsibility for final transport from the Facility to authorized recycling, disposal and/or processing facilities for materials that cannot be processed or recycled by Gerdau.

If communication with the Backhaul Project is found to be insufficient at any time, Gerdau will not accept any further shipments.

Photos of the above materials taken during the 2021/2022 Backhaul Project season are appended as Appendix A, demonstrating how the Existing and Additional Hazardous Material will be packed for transportation to the Facility and stored, largely on containment, once at the Facility.

Figure 1, appended, shows the logistics of a transporter entering Gerdau's site with a backhaul load to be dropped off and unloaded. The transporter will enter the site and proceed to the weigh scale for weigh in. The transporter will then proceed to the Non-Ferrous and Garage Buildings where stewardship materials and cardboard would be offloaded, if any, and placed on secondary containment pallets as required. Scrap metals and non-stewardship materials would then be offloaded at the scrap pile for sorting. The transporter would then exit the site at the weigh scale for weigh out. Appendix A includes additional photos showing Gerdau's Non-Ferrous and Garage buildings and secondary containment.

All materials received by Gerdau through the Backhaul Project will be received and stored using Gerdau's existing infrastructure and as a result, no construction or alterations will be needed at the Facility.

Gerdau anticipates that only some backhaul loads will contain hazardous waste and that the majority of the loads will be comprised of scrap metal, which is collected and stockpiled throughout the year by participating communities for transport to receiving facilities during the winter road season.

3.2 Regulatory

Clause 8 of Licence 291 HW authorizes Gerdau to receive hazardous waste at the Facility, limited to waste lead acid batteries, used oil, waste flammable liquids, and mercury switches from scrap automobiles. In order to accommodate its participation in the Backhaul Project, Gerdau requests amendments to Licence 291 HW (as proposed below) that would permit it to receive, store and reload the Additional Hazardous Material at the Facility.

In accordance with Clause 15 of Licence 291 HW, Gerdau will continue to use trained personnel and provide training to all persons who handle dangerous goods, including the Additional Hazardous Material, as required by the DGHTA and the regulations thereunder.

In accordance with Clause 16 of Licence 291 HW, Gerdau will maintain a record of the Additional Hazardous Material received at the Facility. At a minimum, this record will include the following:

- Date of receipt;
- Name and address of the carrier;
- Quantity or weight of material received;
- Source of the material; and,
- Storage time on-site.

Gerdau will maintain records, storage requirements, and environmental controls for the Additional Hazardous Material in accordance with regulatory requirements and the amendments made to Licence 291 HW.

Gerdau anticipates that its participation in the Backhaul Project will not impact its ability to meet the requirements regarding storage of waste batteries outlined in Clauses 16 through 24 of Licence 291 HW. As demonstrated in the photos appended at Appendix A, the Backhaul Project requires participating communities to pack lead acid batteries on pallets, no more than two (2) layers high, separated by cardboard, shrink wrapped, and labeled in accordance with regulations under the DGHTA.

Additionally, Gerdau plans to receive and recycle EV batteries including lithium-ion and nickel metal hydride batteries, although does not anticipate that EV batteries will be received at the Facility through the Backhaul Project. These batteries would be handled in accordance with Gerdau's internal safety procedures using appropriate Personal Protective Equipment (PPE), trained personnel, and storage requirements.

The requirements in Clause 35 (regarding the emergency response contingency plan) will be updated, upon approval of this alteration, to include the handling of the Additional Hazardous Material and specific spill response measures.

With respect to the requested amendments to Licence 291 HW, Gerdau proposes the following revisions to definitions and to Clauses 8, 16, 18, 20, and 22:

“**battery**” means a lead acid electromotive battery, a nickel metal hydride battery, or a lithium-ion battery;”

“**waste battery**” means a battery that:

- a) Through use, storage, handling, defect, damage, expiry or shelf life or other similar circumstance, can no longer be used for its original purpose; or,
- b) For any other reason, the owner or person in possession of the battery intends to dispose of it.”

“8. The Licencee is permitted to receive, store, and reload at the facility hazardous waste including, but not limited to:

- a) Waste batteries including lead acid electromotive, nickel metal hydride, and lithium-ion batteries;
- b) Used oil and associated items (including used oil filters, pails, and lids);
- c) Waste flammable liquids;
- d) Paint pails;
- e) Aerosols and propane tanks;
- f) Mercury switches; and
- g) Electronics and lighting.”

Respecting Waste Batteries and Hazardous Waste

“16. The Licencee shall initiate and maintain a record for all items and materials referred to in Clause 8 of this Licence. The record shall contain, for each day that items and materials are received:

- a) Date of receipt;
- b) Name and address of the carrier;
- c) Quantity or weight of items and materials received;
- d) Source of the items and materials; and
- e) Storage time on-site.”

“18. The Licencee shall store the items and materials referred to in Clause 8 of this Licence in an area that provides containment and not in any other place where there are ports or drains that lead directly or indirectly to a sewer system.”

“20. The Licencee shall store all waste lead acid electromotive batteries on pallets with a layer of corrugated cardboard or other material which will prevent casing ruptures, placed between successive layers of waste batteries. The full pallet of batteries shall have three layers of batteries and be shrink wrapped with plastic before shipment from the facility. The Licencee shall store all other waste batteries in an area where the batteries are secure, and any corrosive solids or liquids cannot enter the surrounding area.

“22. The Licencee shall conspicuously place in the area used for storage of items and materials referred to in Clause 8 of this Licence effective neutralizing materials, or materials approved by the Director in writing, for the containment or clean up of spills.”

4.0

Environmental and Human Health Effects

4.1

Terrestrial

Gerdau's Facility is currently developed and equipped to receive scrap metal, lead acid batteries, used oil, used flammable liquids, and mercury switches. Additional Hazardous Material received through the Backhaul Project will be stored in the Non-Ferrous Warehouse and Garage Buildings. These buildings provide controlled storage environments with concrete floors and secure roofs. No further site development or environmental impact to terrestrial lands and soil is anticipated as part of this alteration.

4.2

Aquatic

There is no expected impact to storm water, surface water, or groundwater. The Additional Hazardous Material will be stored inside buildings with concrete floors and equipped with spill kits minimizing risk to water sources.

4.3

Atmospheric

Changes to emissions from the Facility are insignificant as all operational equipment and employees needed to receive and handle backhaul loads are already in place. Due to the operation of the Backhaul Project, it is expected that there will be a reduction in greenhouse gas emissions off-site. This reduction is realized by backhauling material in trucks that were sent to northern communities to deliver supplies and goods in the normal course. This results in a reduction in greenhouse gases when compared to the alternative scenarios of sending empty, dedicated trucks to northern communities to pick up materials for transportation to processing facilities in the south or allowing empty trucks to return south. Accordingly, for each backhaul utilized, a round-trip of another transport truck is avoided. In the 2023/2024 Backhaul Project season, nine (9) semi-trailer loads of waste material were removed from northern communities (PRO Group, 2024 email). This represents a reduction of approximately 64,000 kg of carbon emissions if all backhaul loads transported materials into participating communities while avoiding empty trucks back to Winnipeg.

4.4

Noise

Changes to noise levels from the Facility are insignificant as all operational equipment and employees are already in place.

4.5 Human Health and Safety

Prescribed personal protective equipment (PPE) will be required to handle the Additional Hazardous Material. This PPE is already in use on-site and includes steel toed safety boots, hard hats with chinstraps, safety glasses, and clothing that covers legs and arms. Gerdau has a robust Safety Management System which requires daily activity risk assessments and will monitor operations to determine if further protection (e.g., dust mask, hearing protection) may be required.

4.6 Economic and Logistical Benefits

Through its expanded participation in the Backhaul Project, Gerdau aims to establish long term relationships with participating PRO groups and First Nation communities to help divert potentially hazardous waste from northern landfills and increase hazardous waste collection and recovery rates in the Province. Gerdau values long-term partnerships in its business of recycling metal.

Assessment

Gerdau's Dawson Road Facility operates pursuant to Licence 291 HW. All existing environmental management and controls on-site support the on-going minimization of any health and environmental impacts from Gerdau's proposed participation in the Backhaul Project and the proposed amendment to Licence 291 HW.

Based on our review, it is our opinion that the environmental effects of the proposed licence alteration are considered to be insignificant, and that if any spills or releases occur, they will be contained within controlled areas already operated by Gerdau.

Summary

In summary, an amendment to Licence 291 HW is required to receive, store, and reload the Additional Hazardous Material including:

- Containers and items associated with used oil (i.e., pails, lids), stored on containment;
- Aerosols and propane tanks, on pallets;
- Paint pails and containers, stored on containment;
- Waste batteries including nickel metal hydride and lithium-ion batteries; and,
- Electronics and lighting on pallets.

Following Dillon's environmental review, it is our opinion that with the implementation of the described site management and controls, the environmental and human health effects of the proposed alteration will be insignificant and that if any spills or releases occur, they will be contained within controlled areas already operated by Gerdau.

Closure

The source information communicated in this letter was provided by Gerdau. Dillon has compiled this information and conducted our assessment based on this information along with our understanding of their licensed operation, management controls, and our professional judgement. Dillon accepts no responsibility for damages, if any, suffered by any third party as a result of decisions made or actions based on this report.

DILLON CONSULTING LIMITED



Heather Fisher, P.Eng., PMP, EP(CEA)
Environmental Engineer

Gerdau Ameristeel Corporation

*Notice of Alteration – Licence No. 291 HW – Collection and Transfer Facility
at 314 Dawson Road North, Winnipeg
January 2025 – 24-7878*



Figure

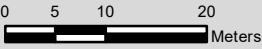


GERDAU METALS RECYCLING

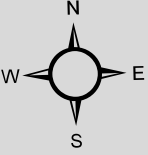
314 Dawson Road North
Winnipeg, MB
NoA Licence 291 HW

**PLAN SHOWING LOGISTICS FOR
OFFLOADING MATERIALS**
FIGURE 1

 Traffic Flow Direction



1:750



MAP DRAWING INFORMATION:
DATA PROVIDED BY CANVEC, ESRI, MANITOBA MLI,
& DILLON CONSULTING
MAP CREATED BY HB
MAP CHECKED BY HF
MAP PROJECTION: NAD 1983 UTM Zone 14N



PROJECT: 24-7878
STATUS: DRAFT
DATE: 2024-12-17

Appendix A

Photos



Latex Paint



Electronics



Household Recycling



Batteries and Used Oil



Tires and Appliances



Tires and Appliances



Tires and Appliances



Tires and Appliances



Tires and Appliances



Tires being removed from voids around battery
pallets and oil drums



Tires being removed from voids around battery
pallets and oil drums



Oil Pails



Oil Pail Lids

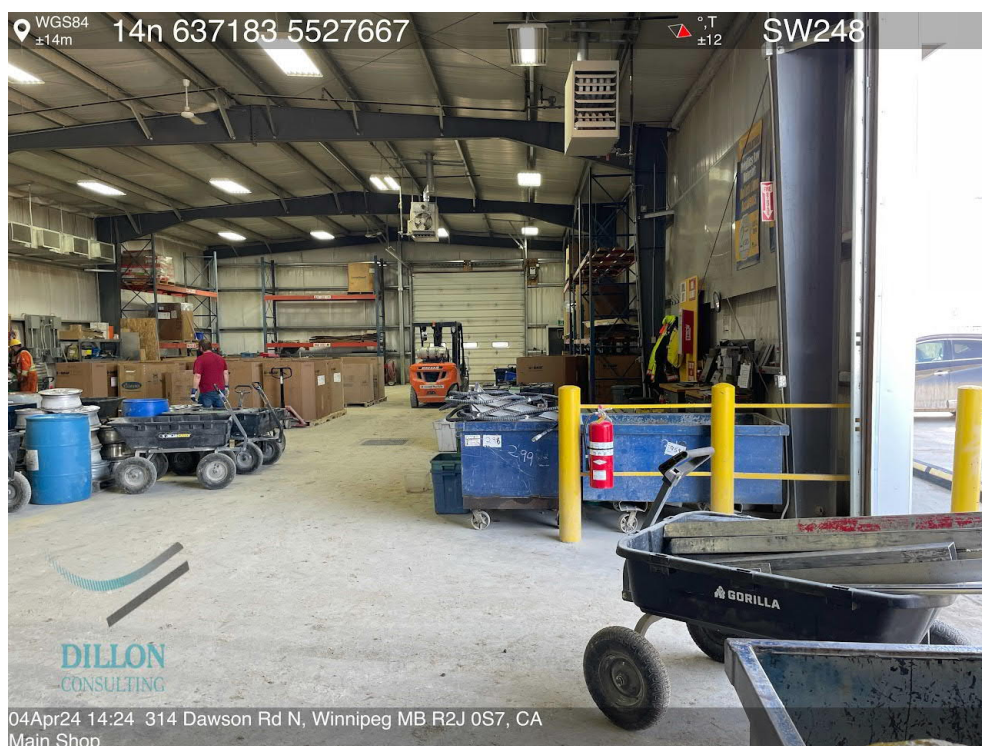


Oil Drums

Photos Credits: Randy Webber as seen in the report titled *The Backhaul Project, Summary Report for the Removal of Stewardship and Non-Stewardship Material from Northern Manitoba Remote First Nation Communities*, August 2022.



View of **battery storage practices** and the interior of **Non-Ferrous Building** where materials will be temporarily stored. Note: secondary containment pallets shown.



View inside Non-Ferrous Building where material will be temporarily stored.



View inside Garage Building where material will be temporarily stored.

Photo Credits: Dillon, April 2024

References

PRO Group, August 2022. *The Backhaul Project, Summary Report for the Removal of Stewardship and Non-Stewardship Material from Northern Manitoba Remote First Nation Communities.*

Fisher, H. (2024) Email to Harrison Briand, 11 December.