

## **Beshada, Eshetu (SD)**

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**From:** Gene Senior <gsenior@kgsgroup.com>

**Sent:** September-24-18 4:08 PM

**To:** Beshada, Eshetu (SD) <Eshetu.Beshada@gov.mb.ca>

**Cc:** 'yanek@rakowskicartage.com' <yanek@rakowskicartage.com>; Shaun Moffatt <smoffatt@kgsgroup.com>;

Josephine Rokyta <j.rokyta@kgsgroup.com>

**Subject:** RE: File 5972.00 - Rakowski Recycling - Lead Acid Batteries

Mr. Beshada:

KGS Group is providing additional information on behalf of Rakowski Recycling, as part of the proposal submitted under the Dangerous Goods Handling and Transportation Act.

### **The following information is provided in response to Questions one (1) through four (4).**

At present, waste Lead Acid Batteries (LAB) are collected and stored off the ground on wooden pallets in the yard of the facility. The proponent has proposed to incorporate a metal shipping container as the storage location for palletized waste LAB.

The shipping container will:

- provide cover for the LAB and protection from rain and other weather events;
- be ventilated;
- include a supply of effective neutralizing materials for the containment or clean-up of spills; and
- include an acid-proof coating on the floor to provide containment in the event of an electrolyte spill.

### **Question five (5) - inventory of waste batteries:**

The maximum inventory stored at the facility would be 60,000 lbs (27,215 kg).

### **Question six (6) - potential explosion or fire:**

As noted in the Safe Work Procedure for handling LAB, the batteries are to be stored in a cool, well ventilated area away from ignition sources (e.g. welding, smoking). Stored LAB can give off minor amounts of hydrogen and oxygen due to normal evaporation of water, depending upon the amount of ambient heat and air humidity. When LAB are recharged more gas can be released; however, the facility will not be recharging the waste LAB. Given that the storage facility will not recharge the waste LAB and will be well-ventilated, the potential for fire and explosion will be kept to a minimum.

As part of a previous request for information relating to zoning of the facility, KGS Group contacted the City of Winnipeg Planning, Property and Development department to inquire about permitted activities. In their response, the department indicated that activities relating to auto wrecking are not permitted (Attachment 1). Further clarification was requested from the department and they revised the permitted activities letter to indicate that the facility is permitted to receive and palletize lead acid batteries to be shipped away for processing (Attachment 2).

**Gene Senior** <gsenior@kgsgroup.com>

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**From:** Beshada, Eshetu (SD) [<mailto:Eshetu.Beshada@gov.mb.ca>]  
**Sent:** Thursday, July 26, 2018 12:15 PM  
**To:** Yanek Rakowski  
**Cc:** Gene Senior; Shaun Moffatt  
**Subject:** File 5972.00 - Rakowski Recycling -

Hello Mr. Rakowski,

The review period for the proposal submitted under the Dangerous Goods Handling and Transpiration Act has been closed. Please send me a response on the following comments.

1. Provide information how the waste batteries are protected from precipitation and other weather events.
2. Describe how the waste batteries storage area is constructed.
3. Provide measures in place to prevent potential runoffs/ seepage from the waste batteries storage area.
4. Provide a comment if the floor of the waste batteries storage area is resistant to acid.
5. What is the inventory of the waste batteries stored in the yard at any given period.
6. Provide information with respect to potential explosion or fire from the waste batteries storage and handling.

Regards

**Eshetu Beshada, PhD, P. Eng.**  
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