



October 18, 2016

Manitoba Sustainable Development
Environmental Approvals
2nd Floor, 123 Main St. (Box 80)
Winnipeg, MB R3C 1A5

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

TRACEY
Dear Ms. Braun:

RE: Variance to Dangerous Goods Handling & Transportation Act License No. 58 HW S2 RRRR

Please accept this as Miller Environmental Corporation's (Miller) proposal to receive a variance to the issued Dangerous Goods Handling & Transportation Act License No. 58 HW S2 RRRR and the requirements specifically associated to paint management.

With the success of the household hazardous waste stewardship program, Miller is seeing high volumes of waste paint arriving at our processing facility (facility). Paint is packaged into tubskids (432 L volume container), provided by Product Care, throughout Manitoba household hazardous waste depots and then transported to our facility. Paint is packaged into the tubskids only if properly contained in their original can making the whole package double contained. On average, tubskids contain a mixture of roughly 80% non-flammable and non-hazardous latex paint and 20% oil based paint. Received paint tubskids are then sorted to segregate latex and oil based paint and then repackaged back into tubskids. Once segregated, oil based paint tubskids are transferred to process buildings that have fire suppression systems and latex paint tubskids are classified as non-regulated material. With these properties of paint tubskids, we would like to propose storage and sorting of tubskids in storage building 1 (SB1).

SB1 is a canvas covered, non-heated, steel framed structure sitting on a 446 m² bermed concrete pad. With the high volumes of tubskids arriving at the facility labelled as class 3 flammable liquid waste, we are limited to store them in buildings that have fire suppression systems as per our operating licence. The volume of tubskids is now exceeding our storage capacity for process buildings with fire suppression systems. With the majority of each tubskid being roughly 80% non-flammable and non-hazardous latex paint, we would like to propose receiving a variance to store and sort up to 200 tubskids in SB1. This will allow us to stay in compliance with our operating licence storage requirements and manage this low hazard waste stream.

Sincerely yours,
Miller Environmental Corporation

A handwritten signature in black ink, appearing to read 'Dave Howes', with a stylized flourish at the end.

Dave Howes
Technical Services Coordinator

CC: Raj Rathanamo - Manitoba Sustainable Development
Paul Bauer – General Manager, Miller Environmental Corporation
Vaughn Bullough – Vice President, Miller Environmental Corporation