

(In reply, please refer to)

Our File: 13-7596



August 20, 2013

Environmental Approvals Branch
Manitoba Conservation and Water Stewardship
Suite 160 – 123 Main Street
Winnipeg, Manitoba R3C 1A5

Attention: Mr. Raj Rathamano, Hazardous Waste Program Specialist

Re: Addendum to Dangerous Goods Handling and Transportation Act Application

Dear Mr. Rathamano:

As previously discussed, please find enclosed an Addendum to the Dangerous Goods Handling and Transportation Act Application dated June 6, 2013, submitted by Dillon Consulting Limited (Dillon) on behalf of Gerdau Ameristeel Corporation (Gerdau) for the continued operation of a waste lead acid battery transfer facility located at 314 Dawson Road North in Winnipeg, Manitoba.

We trust that the information included will cover the questions received via email on June 28, 2013. Due to the limited scope of the application, we have aimed to provide a concise information package.

Lastly, we have attached the original application document for your ease of reference. Please do not hesitate to contact me if you have any questions.

Regards,

A handwritten signature in blue ink, appearing to read "Dennis Heinrichs", written over a horizontal line.

Dennis Heinrichs, M.Sc., P.Eng.
Partner

DMH/knh

Attachment

O:\PROJECTS\FINAL\137596\Reports\Final\Battery Permit Application\Gerdau - Dawson Road Battery Permit - Addendum Cover Letter (1).docx

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**Dillon Consulting
Limited**

**Addendum to Dangerous Goods Handling and Transportation Act Application Dated June 6, 2013
– Gerdau Ameristeel Corporation – 314 Dawson Road North, Winnipeg, Manitoba**

**In Response to Questions Received from Manitoba Conservation and Water Stewardship on
June 28, 2013 via Email (Attached)**

The following parameters are addressed in this addendum:

1. Loading of Batteries for Shipment

Batteries are stored indoors within the facility until a purchaser picks them up. Loading involves moving the pallets through two sliding doors to the exterior of the building using a pallet mover (see **Figure 1**). The interior of the building comprises of a concrete pad. Due to the age of the sliding doors, they are slated to be replaced shortly. Pallets are immediately placed onto the transport vehicle. The purchaser is responsible for the loading of batteries. In case of any spillage, both Gerdau and the purchaser have battery spill kits on hand for containment and clean up (see **Figure 2**). Operators will be trained on the appropriate use of the spill kit. The majority of batteries from this site are purchased and transported by Interlake Salvage and Recycling Inc. in Stonewall, Manitoba. Interlake Salvage and Recycling Inc. is licensed to handle and transport waste lead acid batteries.

2. Broken or Leaking Batteries

The site does not purchase any broken batteries and batteries are inspected before they are added to the pallets for storage. Automobiles that arrive on site are usually towed-in intact, so the chance of receiving broken batteries is low. All crushed automobiles received already have batteries removed.

To date, since January 2013, the site has not received a broken or leaking battery. Thus, this is not anticipated to occur more than once or twice per year. An appropriate battery spill kit is available on-hand for containment and clean up (see **Figure 2**). Operators are trained on the appropriate use of the spill kit.

In the case a broken or leaking battery is identified, it will be contained immediately within a drum marked for broken batteries. An absorbent and neutralizing agent from the battery spill kit would be utilized for any spillage. Any materials used from the spill kit (e.g. soiled absorbents) will be disposed of appropriately. Disposal will be handled by a licensed hauler (e.g. Miller Environmental) if it does not meet the standards for office waste or municipal solid waste (which is picked up by BFI). Once full, the contained drum for broken batteries will be picked up by a licensed hauler (e.g. Interlake Salvage and Recycling Inc.) for appropriate recycling and management.

3. Fire Detection, Prevention, and Measures Adopted

Three (3) Class A/B/C fire extinguishers are installed appropriately within the battery storage building. The extinguishers are tested monthly by Bison Fire Protection Inc. Smoke detectors are not currently present within the battery storage building but are to be installed by Bison Fire Protection Inc.

4. Number and Weight of Batteries Stored

This application is to cover storage of 5 to 7 pallets of waste lead acid batteries, loaded to a maximum of 3 levels. Between 70 and 75 batteries fit on each pallet. This equates to a maximum of 525 batteries stored on site during any given period in time or approximately 15,750 pounds stored (assuming each battery can weigh up to 30 pounds).

5. Batteries Received from Off Site

In addition to the batteries removed from the scrap automobiles on site, occasionally Gerdau purchases spent batteries in bulk from stores such as Canadian Tire. All batteries purchased are intact and inspected before received by Gerdau.

6. TDG Classification

All batteries collected and stored are confined to the following TDG Class for lead acid batteries:

Batteries, wet, filled with acid, electric storage – Class 8, UN2794

On very rare occasions, a few lithium ion batteries may be removed from scrap automobiles. To date, since January 2013, the site has not received any lithium ion batteries. In the case a lithium ion battery is identified, they will be removed according to the manufacturer's protocol. The proper health and safety guidelines would be followed by staff. The lithium ion batteries would be stored temporarily (separately, but in an identical manner to the waste lead acid batteries). They would then either be returned to the original auto manufacturer for processing, according to their protocol, or sold for recycling to Interlake Salvage and Recycling Inc.

7. Mercury Switches from Scrap Automobiles

Generally, mercury switches are rarely present in the scrap automobiles arriving on site. Mercury switches are only found in older model vehicles. When a scrap automobile arrives on site, it is inspected for mercury switches prior to receipt. If a mercury switch is found, it is removed before the scrap automobile is placed into storage. Gerdau participates in the Mercury Switch Out Program (<http://www.switchout.ca/>) and adheres to the procedures outlined in this program.

The approximate number of mercury switches removed and collected per month is 20 (maximum). Switches are shipped out via Purolator.

8. Fluid Extraction from Scrap Automobiles

The fluid extraction system simply removes and appropriately stores waste fluids from scrap automobiles processed on site. A forklift places the scrap automobile onto the frame (see **Figure 3**) and a drill is used to puncture the tanks on the automobiles. Waste fluids are collected by the SEDA drain tower and stored in four (4) 2000 L tanks behind the system. All of the tanks are double walled for secondary containment. As the SEDA drain tower is a portable unit, the tanks are connected to the drain tower through flexible rubber hoses. Waste fluids are not extracted on days with high winds.

A spill kit specifically for the fluid extraction area has been ordered for containment and clean up of any spillage. Operators will be trained on the appropriate use of the spill kit.

Waste fluids removed and stored, along with approximate quantities and disposal methods, are outlined as follows:

Tank #	Waste Fluid(s) Contained	Approximate Quantities Per Month	Disposal Method
1	Engine oil, transmission oil	1000 L per month (max.)	Picked up by Green For Life monthly
2	“Good gas”	1000 L per month (max.)	Consumed through on-site operations
3	“Bad gas,” diesel	500 L per month (max.)	Picked up by Green For Life monthly
4	Coolant, windshield washer fluid	Trace amounts per month	Picked up by Green For Life monthly

9. Oil Filters from Scrap Automobiles

Oil filters are not removed from the scrap automobiles, as there is not much oil contained within these filters. They have not been deemed to be of a safety or environmental concern.



Figure 1: Two sliding doors on the exterior of the battery storage building used for loading. Due to the age of the sliding doors, they are slated to be replaced shortly.



Figure 2: Battery spill kit accessible on site.



Figure 3: SEDA drain tower (fluid extraction system) located near the west perimeter of the site.
Waste fluids are stored in the double-walled tanks behind the system.



Lam, Clement <clam@dillon.ca>

Re:DGHTA Application -Waste Lead Acid Battery Transfer Facility - 314 Dawson Rd, Winnipeg - Gerdau Ameristeel Corporation

Rathamano, Raj <Raj.Rathamano@gov.mb.ca>
To: "clam@dillon.ca" <clam@dillon.ca>

Fri, Jun 28, 2013 at 3:51 PM

Dear Mr. Lam,

We have reviewed the DGH & T Act application for the continued operation of a waste lead acid battery transfer facility dated May 6, 2013, submitted by Dillon Consulting on behalf of Gerdau Ameristeel Corporation. In this regard, we would like to request the following details on the proposal:

1. Description of loading of batteries for shipment: is there a loading pad involved? If so, measures taken to prevent any soil contamination when loading batteries in case of an accident.

2. Description of measures taken in handling broken or leaking batteries: how these batteries are packaged – stored and shipped?

Methods adopted in spill containment from the broken batteries and if absorbents are involved, how the soiled absorbents are disposed of?

3. Details about fire prevention: on-site fire fighting equipments / measures adopted

4. Number of batteries stored (with approximate weight in kg)

5. Are there any batteries received from offsite in addition to the batteries removed from the scrap automobiles on-site?

6. Please confirm whether the batteries collected are confined to the following TDG classification:

Shipping name: Batteries, wet, filled with acid, electric storage -Class 8, UN2794

7. Are there any mercury switches removed from the scrap automobiles or received from offsite? If so, how are these handled? Provide details on storage methods, quantity, shipping, disposal, etc.
8. Provide details on fluids extracted from the scrap automobiles. This should include methods used in fluid extraction, type/s of fluid removed, storage capacity, storage methods, spill protection methods, spill containment and cleanup methods/materials employed, and disposal methods. [fluids includes used engine oil, transmission oil, gasoline, diesoline, washer fluid, etc.]
9. Are oil filters removed from scrap automobiles? If so, provide details on removal, storage, disposal, etc.

If you have any questions or concerns regarding this, please do not hesitate to let me know.

Regards,

Raj Rathamano, M.Sc.

Hazardous Waste Program Specialist

Environmental Approvals

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