



27 June 2025

Desalegn Edossa, D.Eng., P.Eng.
Environmental Engineer
Land Use, Waste Management & Energy
Environmental Approvals Branch
Department of Environment and Climate Change
14 Fultz Blvd,
Winnipeg, MB R3Y 0L6

Via email: desalegn.edossa@gov.mb.ca

Re: **Discussion Items for Draft Permit 334 HW R**
GFL Environmental Services Inc.
File No 4320.10 GFL Kenaston Hazardous Waste Facility Licence No 334 HW

Dear Mr. Edossa:

GFL is in receipt of your email dated June 18, 2025, seeking information on items related to GFL's Draft Dangerous Goods Handling and Transportation Act Permit number 334 HW R (the permit). This letter will outline the concerns raised by the Environmental Approvals Branch (EAB) and provides GFL's corresponding response.

As part of the process EAB has proposed a revision to Licence No. 334HW to 334HWR. The revised licence contains twenty-three new definitions, clauses, and significantly altered clauses; the majority of which are not directly related to the installation of the new tank farm. The revised licence will require significant consultation with the EAB to understand the new and modified requirements and how they fit within the operational frame work of GFL. GFL believes that the new tank farm is a replacement of the current tank farm and does not introduce new processes nor a significant change in waste storage volumes. As such, GFL is requesting that the EAB approve the new tank farm as per the Notice of Alteration (NoA), that was submitted on March 18, 2025. It should be noted that the permitting for the new tank farm was identified as requiring a NoA. A major revision of the licence was not communicated to GFL by the EAB until receipt of the draft on June 18, 2025.

GFL believes that a more prudent time to discuss a revision to the permit as a whole would be during third and fourth quarter of 2025 when the facility will be decommissioning the existing tank farm . At that time GFL will be evaluating site activities for process efficiencies and improved environmental controls, which may tie into the proposed revisions to the permit as identified by EAB.

EAB provided a number of additional questions related to the NoA submission for the new tank farm. GF's responses are as follows:

1. Please provide location and design details for truck off-loading pad(s). The design plan is not included in the additional information submitted.

The Truck offload area is to be adjacent to the containment of the new tank farm through a series of dedicated pipe headers to each individual tank. Drip trays are to be employed by operators to contain any

potential release of materials during transfer operations. Standard Operating Procedures are in place for all work completed

2. Process changes to the facility operations. E.g. processing of dewatering used oil has changed to avoid excessive heat and associated air emissions. GFL's process has been modified so that any tank at the facility can be used for alternate fuel production. The Site operations plan has been updated to reflect this change as well as the SOPs for the Site. Has the Department been notified about these process changes in facility operation?

The most recent Facility Operations Plan, *Operation Plan, GFL Environmental Services Inc., V1.7, 6May2025*, has been sent with this letter.

3. Could you please confirm whether the tanks being used are dual-certified per UCL S601 and UCL-S652? Drawing No. VSW 125000 25003479 references ULC S601; however, some tanks are intended to store used oil, which may require compliance with ULC S652. If the tanks are not certified under UCL S652, you would have to request for a variance.

Variance request was submitted to the Petroleum Branch on June 23, 2025.

4. Please confirm if you have already submitted permit for removal and addition of tanks.

Permits will be submitted by the Licensed Petroleum Technician as per the applicable deadlines for construction and removal.

5. Are you storing non-hazardous wastes at the facility? We know GFL has a MRF permit to process non-hazardous waste. Please refer to your permit for the list of non-hazardous wastes which are collected but not processed under your MRF permit.

Nonhazardous wastes are stored and processed at the facility as per Material Recovery Facility Permit No. 69195. No other non-hazardous wastes are stored at the facility.

6. What is the location of tanks P1 to P4? If the tanks are used for storage, what are you going to store in them and does it change the maximum capacities in the license clauses? Based on this change, we are changing the tank names to S1 to S4 in the new license. Please summarize the tanks on the site in a table showing tank ID, location, volume, function (processing/storage), waste type and etc (see the attached draft table).

Tanks listed as P1 to P4 (Process Tanks Farm) and P5 to P8 (Inside Building A) are to be removed from site by December 31, 2025.

7. We believe there is a new double-walled 50,000 L storage tank (horizontal) located next to a 50,000 L flammable liquid storage tank. Where is it located on the layout?

The 50,000 L double-walled tank was installed inside Building B and is included in the approved Notice of Alteration dated February 19, 2025.

8. Is there a tank with 125,000 L dedicated for glycol storage? (refer to clause 62 of the draft license). If you are using drums, the total maximum number of drums is about 610. Where are you storing them? In connection with this, do you want the following volumes to be updated in the new license?:

a. glycol: maximum volume of 125,000 Litres (clause 62)?

Building B is arranged such that any of the tanks can receive wastewater or waste glycol. The total capacity of tanks in Building B is 130,000 L. GFL requests that the storage limit for waste Glycol be increased to 130,000 L.

There are no drums or any other sort of container used to store waste glycol at the facility.

b. gasoline and diesels: maximum volume of 1,200,000 Litres (clause 63).

There is no plan to alter the reception and processing of waste gasoline and diesel, the current approval limit is fine.

c. waste solvent: maximum volume of 50,000 Litres (clause 64).

There is no plan to alter the reception and processing of waste solvent, the current approval limit is fine.

9. Please update the facility layout (site plan) to incorporate all changes approved through the Notices of Alteration, including the submission dated March 18, 2025

The updated site layout has been sent with this letter.

10. Summary table for tanks

Tank ID	Location	Volume (L)	Function (storage/processing)	Type of waste stored
WW1	Building B	20,000	Storage	Wastewater/Glycol
WW2	Building B	20,000	Storage	Wastewater/Glycol
WW3	Building B	20,000	Storage	Wastewater/Glycol
WW4	Building B	20,000	Storage	Wastewater/Glycol
WW5	Building B	50,000	Storage	Wastewater/Glycol
FPT1	In proximity to Building A	5,000	Storage	Waste Oil
S1	In proximity to Building A	4,510	Storage	Solvent
B1	In proximity to Building A	50,000	Storage	Waste Fuels/Waste Solvents
1	New Tank Farm	125,000	Storage	Waste Fuels/Waste Solvents/Waste Oil
2	New Tank Farm	125,000	Storage	Waste Oil
3	New Tank Farm	125,000	Storage	Waste Oil
4	New Tank Farm	125,000	Storage	Waste Fuels/Waste Solvents/Waste Oil
5	New Tank Farm	125,000	Storage	Waste Oil
6	New Tank Farm	125,000	Storage	Waste Oil
7	New Tank Farm	125,000	Storage	Waste Fuels/Waste Solvents/Waste Oil

Tank ID	Location	Volume (L)	Function (storage/processing)	Type of waste stored
8	New Tank Farm	125,000	Storage	Waste Oil
9	New Tank Farm	125,000	Storage	Waste Oil
10	New Tank Farm	125,000	Storage	Waste Fuels/Waste Solvents/Wate Oil
11	New Tank Farm	125,000	Storage	Waste Oil
12	New Tank Farm	125,000	Storage	Waste Oil
13	New Tank Farm	125,000	Storage	Waste Fuels/Waste Solvents/Wate Oil
14	New Tank Farm	125,000	Storage	Waste Oil
15	New Tank Farm	125,000	Storage	Waste Oil
16	New Tank Farm	125,000	Storage	Waste Fuels/Waste Solvents/Wate Oil
17	New Tank Farm	125,000	Storage	Waste Oil
18	New Tank Farm	125,000	Storage	Waste Oil
19	New Tank Farm	125,000	Storage	Waste Fuels/Waste Solvents/Wate Oil
20	New Tank Farm	125,000	Storage	Waste Oil
21	New Tank Farm	125,000	Storage	Waste Oil
22	New Tank Farm	125,000	Storage	Waste Fuels/Waste Solvents/Wate Oil
23	New Tank Farm	125,000	Storage	Waste Fuels/Waste Solvents/Wate Oil
24	New Tank Farm	125,000	Storage	Wate Oil
PST1	Inside Building A	4,600	Storage	Waste Oil
P1	Process Tank Farm	60,000	Storage To be decommissioned by 31-Dec-25	Waste Oil
P2	Process Tank Farm	60,000	Storage To be decommissioned by 31-Dec-25	Waste Oil
P3	Process Tank Farm	60,000	Storage To be decommissioned by 31-Dec-25	Waste Oil
P4	Process Tank Farm	60,000	Storage To be decommissioned by 31-Dec-25	Waste Oil
P5	Inside Building A	15,230	Storage To be decommissioned by 31-Dec-25	Waste Oil

Tank ID	Location	Volume (L)	Function (storage/processing)	Type of waste stored
P6	Inside Building A	15,230	Storage To be decommissioned by 31-Dec-25	Waste Oil
P7	Inside Building A	15,230	Storage To be decommissioned by 31-Dec-25	Waste Oil
P8	Inside Building A	15,230	Storage To be decommissioned by 31-Dec-25	Waste Oil
K1	Main Tank farm	120,000	Storage To be decommissioned by 31-Dec-25	Waste Hydrocarbons
K2	Main Tank farm	120,000	Storage To be decommissioned by 31-Dec-25	Waste Hydrocarbons
K3	Main Tank farm	120,000	Storage To be decommissioned by 31-Dec-25	Waste Hydrocarbons
K4	Main Tank farm	120,000	Storage To be decommissioned by 31-Dec-25	Waste Hydrocarbons
K5	Main Tank farm	120,000	Storage To be decommissioned by 31-Dec-25	Waste Hydrocarbons
K6	Main Tank farm	120,000	Storage To be decommissioned by 31-Dec-25	Waste Hydrocarbons
K7	Main Tank farm	124,500	Storage To be decommissioned by 31-Dec-25	Waste Hydrocarbons
K8	Main Tank farm	124,500	Storage To be decommissioned by 31-Dec-25	Waste Hydrocarbons

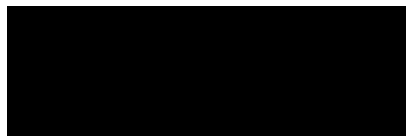
Tank ID	Location	Volume (L)	Function (storage/processing)	Type of waste stored
K9	Main Tank farm	124,500	Storage To be decommissioned by 31-Dec-25	Waste Hydrocarbons
K10	Main Tank farm	124,500	Storage To be decommissioned by 31-Dec-25	Waste Hydrocarbons
K11	Main Tank farm	124,500	Storage To be decommissioned by 31-Dec-25	Waste Hydrocarbons
K12	Main Tank farm	124,500	Storage To be decommissioned by 31-Dec-25	Waste Hydrocarbons
F1	Main Tank farm	640,000	Storage To be decommissioned by 31-Dec-25	Waste Hydrocarbons
F2	Main Tank farm	640,000	Storage To be decommissioned by 31-Dec-25	Waste Hydrocarbons

GFL trusts the information contained in this letter will allow the EAB to approve the NoA under GFL's current licence. GFL is committed to working with EAB to address the additional proposed clauses in the near future.

Should you require further information, please contact the undersigned at (780) 805-6107 or GFL's consultant, Fiona Scurrah, Senior Principal Environmental Scientist, WSP at (204) 918-3277 or Fiona.scurrah@wsp.com.

Yours Sincerely,

GFL Environmental Services Inc.



Cameron Prichard
EHS Manager - Compliance
(cell): 780 805 6107
cprichard@gflenv.com

cc: Colin Dutton, Ray Poppl