11 July 2025

Ms. Agnes Wittmann, Director – Environmental Approvals Branch
Environmental Approvals Branch
Manitoba Environment and Climate Change
14 Fultz Blvd
Winnipeg MB R3Y 0L6

Subject: **File No.: 4320.10: GFL: Notice of Alteration for *Dangerous Goods Handling and Transportation Act* Licence No. 334 HW – Construction and Operation of a New Tank Farm & Decommissioning, Removal, and Disposal of Existing Tank Farms**

Dear Ms. Wittmann:

WSP Canada Inc. was retained by GFL Environmental Ltd., to compile a Notice of Alteration (NoA) related to its *Dangerous Goods Handling and Transportation Act* Licence 334HW (the Licence), for the GFL Hazardous Waste Facility located at 1090 Kenaston Avenue in Winnipeg Manitoba. As per Clause 109 of the licence, GFL is required to obtain approval in writing from the Director for any proposed alteration to the Facility.

This letter report provides an environmental assessment associated with the proposed construction, installation and operation of a new tank farm consisting of 24 x 125,000 L (total volume of 3,000,000 L) aboveground storage tanks (ASTs) to the Facility and the decommissioning, removal and disposal of the existing tank farm (14 tanks with a total volume of 2,797,000 L) and process tank farm (8 tanks with a total volume of 300,920 L), and forms part of the NoA submission along with the NoA application form to MECC.

The construction, installation and operation of new tank farm, at the Facility would be considered a minor alteration to the Licence, given that the environmental impacts would not be significant, as the new tank farm would mean the subsequent removal of the existing tank farm.

As per guidance by MECC, there is a requirement for payment of five hundred dollars ($500.00) for the NoA fee; however, as the alteration does not alter or change the current environmental effects related to the Development, this fee may be waived by MECC. GFL is requesting that this fee be waived.

1 ALTERATION

The proposed alteration to the Facility is the installation of a new tank farm and the removal of the existing tank farm. Components for each are outlined below.

- A new tank farm consists of 24 x 125,000 L vertical aboveground storage tanks for a total volume of 3,000,000 L.
- Old tank farm consists of 14 vertical aboveground storage tanks with a total volume of 2,747,000 L as identified in Clause 58 of the EAL.

WSP Canada Inc.
6 High Level Road
Oak Bluff (Winnipeg), MB R4G 0E2

wsp.com

- Removal of eight processing aboveground storage tanks in the process tank farm and Building A (noted in Clause 59 of the EAL with a total volume of 300,920 L), as these are not required for processing operations.

The site plan showing the proposed location of the tank farm is located in Attachment A.

Existing operations at the Facility will not change with the addition of the tank farm and ASTs. The purpose for the installation and operation of the ASTs is to replace the existing tank farm with newer tanks and to slightly expand the facility's holding capacity.

Greater detail and description of both the existing tank farm and processing tanks and the proposed new tank farm is outlined in the sections that follow.

1.1 EXISTING TANK FARM TO BE DECOMISSIONED

As per the environmental assessment completed for the Facility to obtain its current licence, the Winnipeg Kenaston facility receives shipments of processed oil, waste oil, and waste fuel to be transferred into one of the storage tanks within the main tank farm. Received products are stored, tested, blended, and sold to GFL customers or recyclers to be made into reusable products.

The existing main tank farm, as per Clause 58 of the licence includes:

- Six (6) x 120,000 L vertical storage tanks identified as Tanks K1 to K6;
- Six (6) x 124,500 L vertical storage tanks identified as Tanks K7 to K12; and
- Two (2) x 640,000 L vertical storage tanks identified as Tank F1 and F2.

The total tank volume of the existing tank farm is 2,747,000 L.

Storage tanks in the process tank farm, utilized for the processing of used lubricating oil and other recyclable products, as per Clause 59 of the licence includes:

- Four x 60,000 litre waste oil aboveground storage tank identified as P1 to P4; and
- Four x 15,230 litre waste oil aboveground storage tanks identified as P5 to P8 inside Building A.

The total tank volume of the existing tank farm is 300,920 L.

The total tank volume of the existing tank farm and four processing tanks is 3,047,920.

The current tank farm and associated tanks and the eight processing tanks in the process tank farm will be removed from the Site once the new tank farm and tanks are in place and functioning.

1.2 PROPOSED NEW TANK FARM

The GFL Winnipeg Facility has acquired 24 x 125,000 L Westeel, vertical aboveground, single-walled storage tanks, that will be installed within a new tank farm, northeast of the existing tank farm in proximity to the east property line. The tanks will be used to store waste fuel as per GFL's current licence with a total capacity of 3,000,000 L.

Details of the tanks manufacturer are as follows:

Volume (Litres)	Configuration	Contents	Manufacture Year	Secondary Containment	Manufacturer
125,000	Vertical	Waste Fuels	2024	Steel - Single Walled	Westeel

Specifications for the storage tanks are located in Attachment B.

The table below outlines the numbering of the new tanks and their associated products.

Tank Number	GFL Tank Number	Tank Volume (L)	Contents
1	1	125,000	Waste Oil
2	2	125,000	Waste Oil
3	3	125,000	Waste Solvent, Waste oil, Waste Flammable Liquids
4	4	125,000	Waste Oil
5	5	125,000	Waste Oil
6	6	125,000	Waste Solvent, Waste oil, Waste Flammable Liquids
7	7	125,000	Waste Oil
8	8	125,000	Waste Oil
9	9	125,000	Waste Solvent, Waste oil, Waste Flammable Liquids
10	10	125,000	Waste Oil
11	11	125,000	Waste Oil
12	12	125,000	Waste Solvent, Waste oil, Waste Flammable Liquids
13	13	125,000	Waste Oil
14	14	125,000	Waste Oil
15	15	125,000	Waste Solvent, Waste oil, Waste Flammable Liquids
16	16	125,000	Waste Oil
17	17	125,000	Waste Oil
18	18	125,000	Waste Solvent, Waste oil, Waste Flammable Liquids
19	19	125,000	Waste Oil
20	20	125,000	Waste Oil

Tank Number	GFL Tank Number	Tank Volume (L)	Contents
21	21	125,000	Waste Oil
22	22	125,000	Waste Oil
23	23	125,000	Waste Oil
24	24	125,000	Waste Oil

As per the regulatory requirements, the tank farm will follow all applicable regulations, standards and codes related to the installation and operation of ASTs. The following table outlines the required Manitoba permits or approvals that would be required for the proposed alteration. GFL has retained a qualified third-party service provider to undertake the construction activities associated with the new tank farm and the decommissioning of the old tank farms.

Act, Regulation, Standard or Code	Type of Approval or Permit	Who Responsible to Obtain
Storage and Handling of Petroleum Products and Allied Products Regulation, Man Reg 188/2001	Application for Permit to Construct/Alter a Petroleum Storage Tank System	Licenced Petroleum Technician
	Application for Permit to Operate a Petroleum Storage Tank System	GFL
	Application for Permit to Alter by Removal	Licenced Petroleum Technician
	Petroleum Storage Tank Removal Report	Licenced Petroleum Technician

1.3 CONSTRUCTION

The new tank farm is to be constructed late winter early spring 2025 with the tanks to be installed prior to the end of June 2025. The new tank farm is to be located along the east property line of the Site, northeast of the current tank farm. As per Section 4.3.2 of the National Fire Code (2020), as adopted by the Province of Manitoba (Manitoba), the new tank farm will be located at minimum 3 m from the property line and include 1 m spacing between tanks to allow for accessibility for firefighting purposes.

Installation of the tanks will follow the requirements as outlined in the following Acts, regulations, standards or Codes:

- *Dangerous Goods Handling and Transportation Act*, CSSM c. D12
    - Storage and Handling of Petroleum Products and Allied Products Regulation, Man Reg 188/2001
- National Fire Code (2020) Part 4, Flammable and Combustible Liquids

- Canadian Standards Association's (CSA) B139 Series: 19 Installation code for oil burning equipment
- Canadian Council for Ministers of the Environment (CCME) Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products (Redacted Specific to M.R. 188/2001)

It is proposed that the tank farm will be underlain with a 40 mm Low-Density Polyethylene (LLDPE) liner overlain with two layers of Polypropylene Geotextile material and a granular fill. Secondary containment will consist of a metal berm surrounding the tank farm. Design details are in the process of being finalized. A figure outlining the general characteristics of the construction components of a tank farm is included in Attachment A.

The secondary containment system will meet regulatory requirements and follow the *Canadian Council of Ministers of the Environment (CCME) Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products*.

Electrical components required for the tanks such as alarms will be installed as per regulatory requirements and under electrical permit. GFL is currently working with Manitoba Hydro to ensure that the electrical infrastructure is updated to accommodate the new tank farm.

2 DECOMMISIONING

The existing tank farm as per Clause 58 and the process tanks as per Clause 59 of the existing licence will be removed according to the *Storage and Handling of Petroleum Products and Allied Products Regulation* (MR188/2001).

As per the Dismantling and Removal of Petroleum Product and Allied Product Storage Tank Systems Guideline, a Licensed Petroleum Technician will work to remove the tanks after receiving permission from the Province of Manitoba to do so. The tanks will be purged and serial numbers recorded prior to being removed from the site.

3 GEOTECHNICAL STUDY

The geotechnical investigation was completed on 22 February 2025. The tank farm will be constructed as per the findings from the investigation. The full Geotechnical Investigation report is currently being drafted and will be forwarded to EAB upon completion.

In addition, topographical survey was completed for the site to delineate site drainage and is located in Attachment C. The proposed alteration and decommissioning do not change the overall drainage for the site.

4 SUMMARY OF EFFECTS

The Facility operates as per the Licence terms and conditions. The Operational Plan (OP) and Emergency Response Plan (ERP) for the Facility will be updated to include the location of the new tank farm.

The new tank farm will replace the existing tank farm and does not increase the facility's capacity or traffic to and from the facility. The addition of the new tank farm does not create any new environmental impacts at the site. GFL will continue to comply with its Licence requirements. Thus, the environmental impacts associated with the proposed Alteration are not significant.

5 CONCLUSION

Based on the information provided, WSP is of the opinion that the proposed Alteration, consisting of the completion of a new tank farm consisting of 24 x 125,000 L aboveground tanks, does not create additional environmental effects at the Site, therefore it would be considered a minor alteration under Section 14(1) of the *Environment Act*.

This NoA Report has been prepared for the exclusive use of GFL Environmental Ltd. and their agent(s) for specific application to the property identified in this report. The NoA was compiled in accordance with generally accepted assessment practices. No other warranty, expressed, or implied, is made. General limitations are provided in Attachment D.

We trust that this report meets your present requirements. Should you have any questions, or concerns, please do not hesitate to contact WSP.

Prepared by

[redacted]

Christa De Blaere, B.A., C.E.T.
Senior Environmental Professional

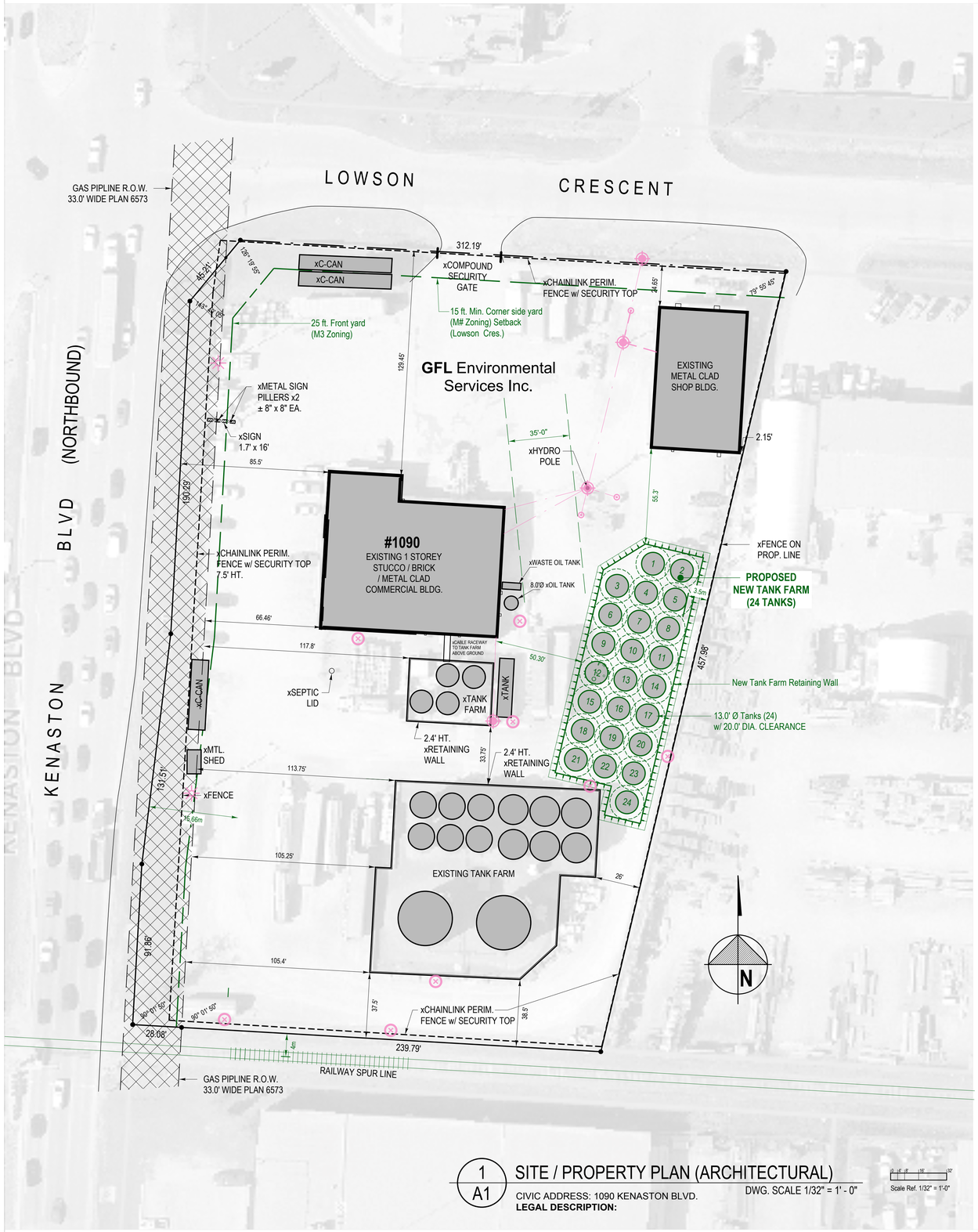
Reviewed by

[redacted]

Fiona Scurrah, M.Sc., R.P. Bio., P.Biol.
Senior Principal Environmental Scientist

Attachment A

Site Plan



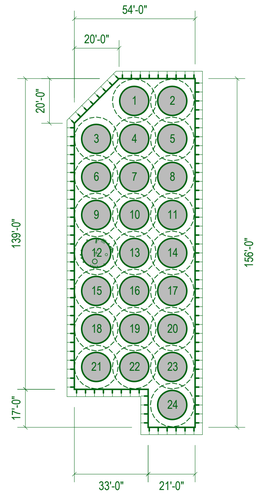
1 / A1 SITE / PROPERTY PLAN (ARCHITECTURAL)

CIVIC ADDRESS: 1090 KENASTON BLVD.

LEGAL DESCRIPTION:

DWG. SCALE 1/32" = 1' - 0"

Scale Ref. 1/32" = 1'-0"



NEW TANK FARM RETAINING WALL DIMENSIONS

PRELIMINARY ONLY

Design-Build:

VALLEY BUILDERS
Box 157 Morris, MB. R0G 1K0
Ph: 204.746.8792
Email: info@valleybuilders.ca

+white architecture Inc.
MAA REG. CORP. NO. 168
113 Chestnut St., Winnipeg, Manitoba, R3G 1R4
email: twhitedesign@shaw.ca
Cell: 204.890.5800

MAR. 05 / 2025 DRAFT 02 Revised
FEB. 20 / 2025 DRAFT 02 Revised
FEB. 18 / 2025 DRAFT 02 New Tank Farm @ East Side
FEB. 14 / 2025 DRAFT 01 (REV.) 50ft. Special Frnt Yard
FEB. 06 / 2025 DRAFT 01 (REV.)
FEB. 05 / 2025 DRAFT 01

Revision	Date	Description	By

Project Title

GFL Environmental
Services Inc.

1090 KENASTON BLVD.
Winnipeg, MB

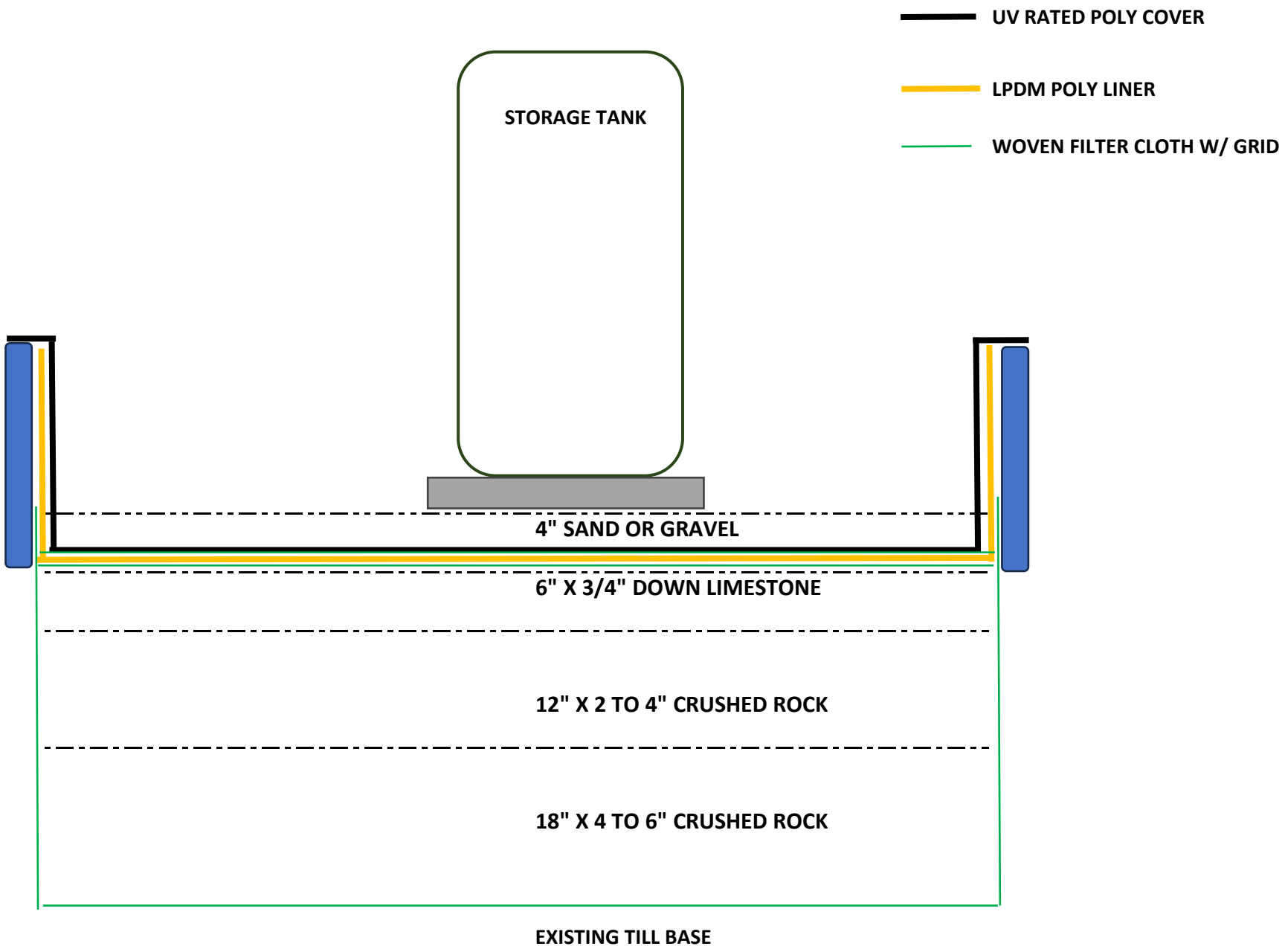
Sheet Title

SITE PLAN
PRELIMINARY PROPOSED
NEW 2025 TANK FARM

Drawn By: TW
Drawing Date: MAR. 05 / 2025
Checked By: TW

Sheet No.
A1

Print Data: 100% ARCH D paper: 24" x 36"


UV RATED POLY COVER
LPDM POLY LINER
WOVEN FILTER CLOTH W/ GRID
STORAGE TANK
4" SAND OR GRAVEL
6" X 3/4" DOWN LIMESTONE
12" X 2 TO 4" CRUSHED ROCK
18" X 4 TO 6" CRUSHED ROCK
EXISTING TILL BASE

Attachment B

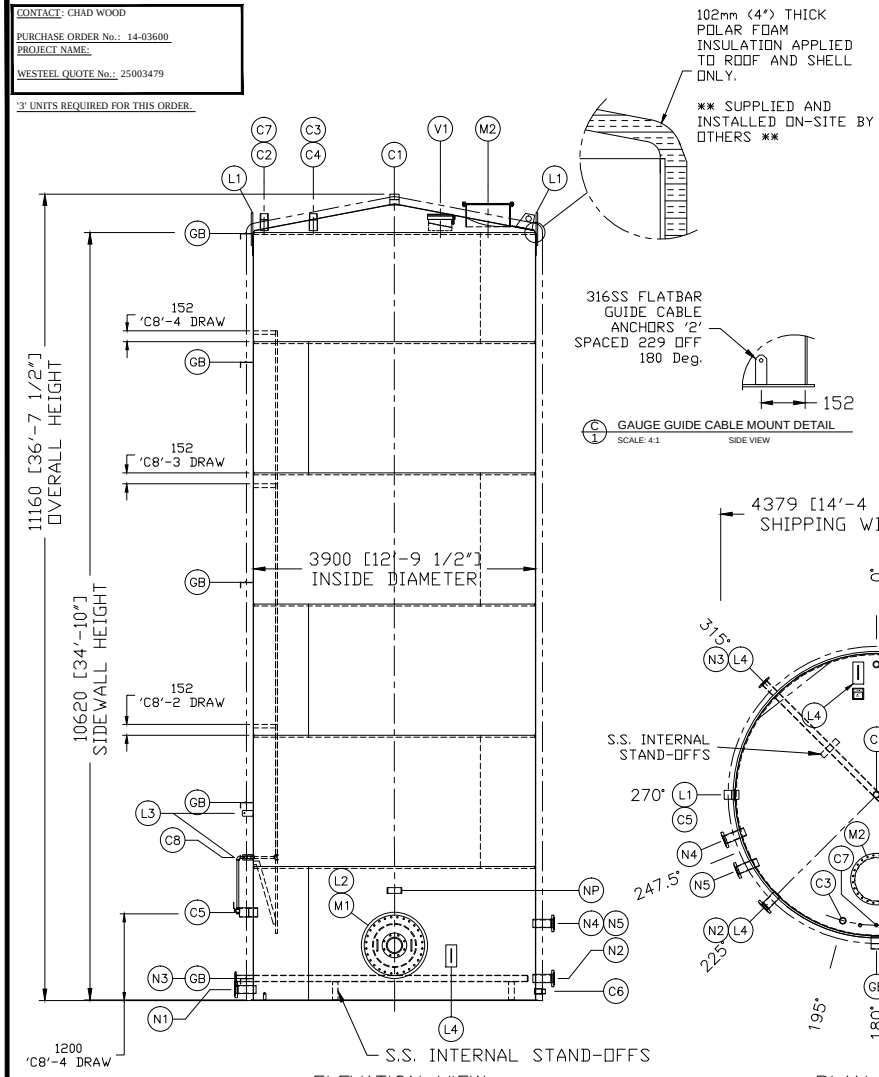
Storage Tanks Specifications

CONTACT: CHAD WOOD

PURCHASE ORDER No.: 14-03600
PROJECT NAME:

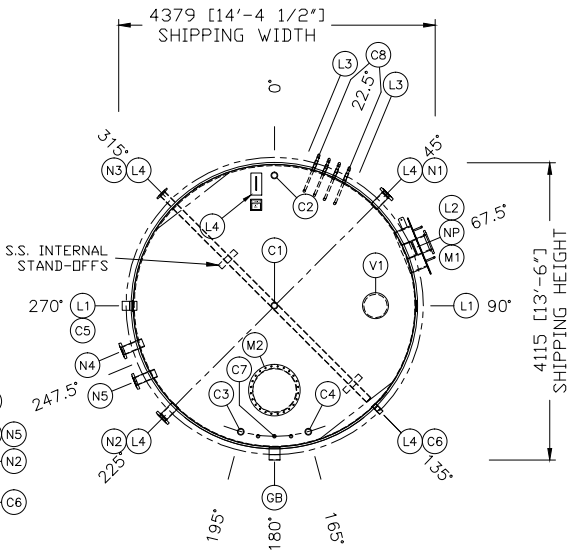
WESTEEL QUOTE No.: 25003479

'3' UNITS REQUIRED FOR THIS ORDER.



C1 GAUGE GUIDE CABLE MOUNT DETAIL
SCALE: 4:1 SIDE VIEW

ELEVATION VIEW
** SIDE VIEW SHOWS ELEVATIONS ONLY, NOT ORIENTED AS SHOWN **

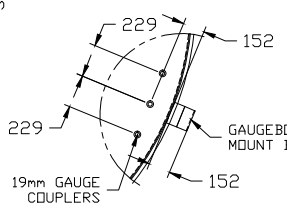


PLAN VIEW
** PLAN VIEW SHOWS EXACT FITTING ORIENTATIONS **

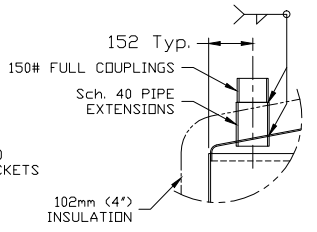
MARK	QTY	ORIENTATION	ELEV.	PROJ.	DESCRIPTION	REMARKS
L1	2	90, 270	-	254	VERTICAL LIFT LUGS (TOP)	25 PL. x 152 x 400 Lg. - 64 Dia. - LUG/REPAD
L2	1	67.5	762	152	GROUNDING LUG	75 x 152 x 4.8 PL.
L3	4	381 off 22.5	1980-2590	152	SAMPLE TRAY MOUNT TABS	75 x 152 x 4.8 PL.
L4	5	0,45,135, 225, 315	-	203	LIFT / TAILING / HOLD-DOWN LIFT LUGS	25 PL. x 203 x 205 Lg. - 76 Dia. - LUG/REPAD
GB	5	180	-	178	GAUGE BOARD BRACKETS	
NP	1	67.5	1524	120	NAMEPLATE MOUNT BRACKETS	- NAMEPLATE INSTALLED
M1	1	67.5	762	204	610 SIDE MANHOLE - REPAD 203 150# ANSI R.F. FLANGED NOZZLE - AGIT.	c/w BOLTED COVER - NITRILE GASKET AGITATOR BY OTHERS
M2	1	180	ROOF	204	610 ROOF MANHOLE	c/w BOLTED COVER - NITRILE GASKET
V1	1	90	ROOF	204	EMERGENCY VENT	c/w GASKET - BOLT ON COVER
N1	1	45	152	254	100 150# ANSI R.F. FLANGED NOZZLE - DISCH.	c/w NYLON FLANGE PROTECTOR
N2	1	225	305	254	100 150# ANSI R.F. FLANGED NOZZLE - FILL	c/w NYLON FLANGE PROTECTOR
N3	1	315	305	254	75 150# ANSI R.F. FLANGED NOZZLE - HEATER HEATER TUBE x 4050 (159 1/2") INSIDE LENGTH	HEATER - SUPPLIED BY OTHERS
N4	1	229 off 247.5	1067	254	100 150# ANSI R.F. FLANGED NOZZLE	c/w NYLON FLANGE PROTECTOR
N5	1	229 off 247.5	1067	254	100 150# ANSI R.F. FLANGED NOZZLE	c/w NYLON FLANGE PROTECTOR
C1	1	T.D.C.	ROOF	120	75 NPT 150# COUPLING - NORMAL VENT	c/w NYLON PLUG
C2	1	0	ROOF	120	75 NPT 150# COUPLING - SPARE	c/w M.I. PLUG
C3	1	195	ROOF	120	75 NPT 150# COUPLING - SPARE	c/w M.I. PLUG
C4	1	165	ROOF	120	75 NPT 150# COUPLING - SPARE	c/w M.I. PLUG
C5	1	270	1220	120	100 NPT COUPLING - SPARE	c/w M.I. PLUG
C6	1	135	152	120	50 NPT 150# COUPLING - WATERDRAW	c/w M.I. PLUG
C7	3	180	ROOF	120	19 NPT 150# COUPLING - GAUGE	c/w M.I. PLUG
C8	4	off 22.5	1980	120	19 NPT 150# COUPLING - SAMPLE PORTS STAGGERED ON 22.5 / SPACED 152 c-c Typ.	c/w S.S. INT. DRAW PIPES - SUPPORTED c/w S.S. EXT.DOWNCOMERS - BALL VALVES

NOTES:

1 - TANK DESIGN, FABRICATION, AND TESTING TO ULC S601-07 SPECIFICATIONS. 10 - 20 kPa. (1.5 - 3.0 psi) AIR TEST AS REQUIRED. ULC LABEL INSTALLED.
2 - ALL DIMENSIONS ARE IN SI UNITS AND MAY VARY DUE TO MANUFACTURING TOLERANCES.
3 - ALL FITTINGS AND ATTACHMENT ELEVATIONS ARE FROM B/O FLOOR PLATE TO CENTER OF ITEM. FITTINGS AND NOZZLES ARE EXTENDED FOR 102mm (4") INSULATION.
4 - SIDEWALL FLANGES AND MANHOLES ARE "2-HOLED" TO VERTICAL CENTERLINE. ROOF FLANGES AND MANHOLES ARE "2-HOLED" TO RADIAL DEGREE MARKS.
5 - FLANGES AND FITTINGS MATERIALS ARE C.S. CLASS 150#.
6 - SHELL SEAMS ARE OFFSET 180Deg. SHELL HEIGHT TOLERANCE: (-0 / +75)
7 - ALL EXTERIOR SURFACES ARE COMMERCIAL BLAST PREPARED TO SSPC-SP6 SPECIFICATIONS AND COATED WITH PPG GREY PRIMER 591 SERIES. INTERIOR SURFACE PREPARATION / COATING: FLOOR AND BOTTOM COURSE ARE BLAST PREPARED TO SSPC-SP10 SPECIFICATIONS AND COATED WITH DEVOE 236. DECALS ARE SHIPPED LOOSE AND TO BE INSTALLED BY END USER AFTER UNITS ARE INSULATED.
8 - SIDEWALL MANHOLE c/w NITRILE GASKET x 1/8" Thk.



A1 'C7' DETAIL
SCALE: 2:1 TOP VIEW



B1 ROOF COUPLING DETAIL
SCALE: 4:1 SIDE VIEW

TANK THEORETICAL CAPACITY: - 126,800 L. (27,898 Imp.Gal.)

No.	DATE	REVISION DESCRIPTION	ECR#	BY	CHK'D
0	18 MAR 15	RELEASE FOR PRODUCTION		LCS	
B	12 MAR 15	DELETE PREVIOUS C7 – C9 SAMPLE PORTS, OLD C10 IS NOW C8		LCS	
A	11 MAR 15	RELEASE FOR APPROVAL		LCS	

WORK ORDER:

WEIGHT: 8,550 kg. (18,800 lbs.)

TANK SIZE: 125,000 L

MATERIAL:

PAINT SPEC: SEE NOTE '7'

UNLESS OTHERWISE SPECIFIED:
1. ALL DIMENSIONS ARE IN mm
2. DIMENSION TOLERANCES ARE:
- LINEAR +/- 10mm.
- ANGLES: +/- 1°.
DONOT SCALE THIS DRAWING

DRAWING REVIEW / STATUS

( )FULLY APPROVED, NO CHANGES, PROCEED WITH FABRICATION
( )REVISE AS NOTED, RESUBMIT FOR APPROVAL, DO NOT PROCEED WITH FABRICATION

FABRICATION SCHEDULING OF THIS PRODUCT IS PENDING FULL DESIGN APPROVAL

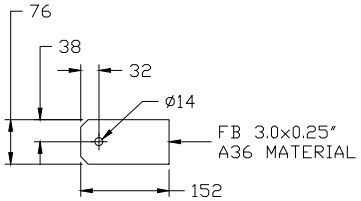
FULL APPROVAL IS REQUIRED TO CONFIRM DETAILS, ORIENTATIONS AND MATERIALS. ANY DELAYS AND/OR CHANGES TO THE DESIGN AFTER FULL APPROVAL MAY CAUSE ADDITIONAL COSTS.

BY:_____ DATE:_____

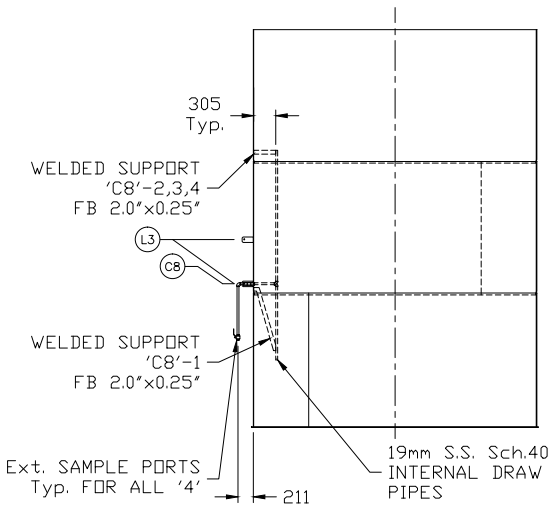
DRAWN BY:	LCS
CREATION DATE:	11 MAR 15
CHECKED BY:	JRN
CHECKED DATE:	17 MAR 15
APPROVED BY:	B.DUEK
APPROVED DATE:	13 MAR 15
PDF.BY:	LCS
PDF. DATE:	12 MAR 15
DXF.BY:	
DXF. DATE:	

WESTEEL
STORAGE SOLUTIONS

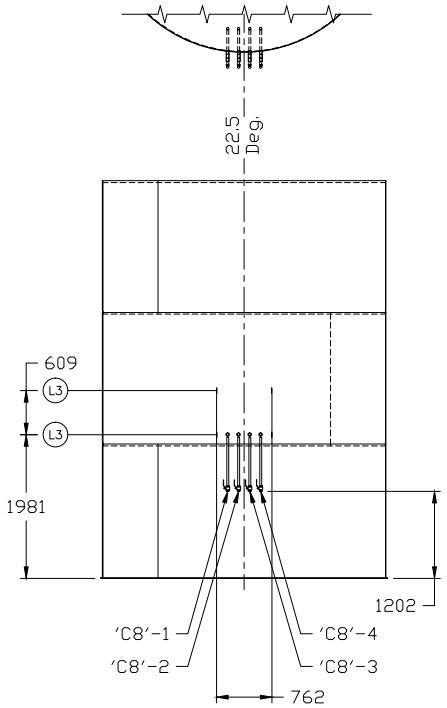
DRAWING DESCRIPTION: GENERAL ASSEMBLY	LOCATION: 5064	REV. 0
CUSTOMER: ENVIROTECH SERVICES		SIZE
DRAWING / FILE No.: VSW 125000 25003479	SHEET 1	OF 5



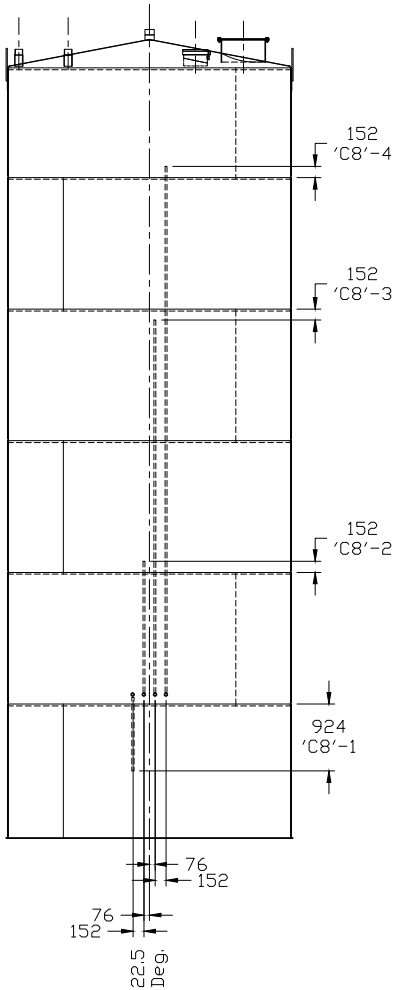
A 1.1 'L3' DETAIL
SCALE: 8:1 SIDE VIEW



DRAW PORT DETAIL
SIDE ELEVATION VIEW



DRAW PORT DETAIL
EXTERNAL FRONT ELEVATION VIEW



DRAW PORT DETAIL
INTERNAL FRONT ELEVATION VIEW

No.	DATE	REVISION DESCRIPTION	ECR#	BY	CHK'D
0	18 MAR 15	RELEASE FOR PRODUCTION		LCS	
B	12 MAR 15	DELETE PREVIOUS C7 – C9 SAMPLE PORTS, OLD C10 IS NOW C8		LCS	
A	11 MAR 15	RELEASE FOR APPROVAL		LCS	

WORK ORDER:

WEIGHT: 8,550 kg. (18,800 lbs.)

TANK SIZE: 125,000 L

MATERIAL:

PAINT SPEC: SEE NOTE '7'

UNLESS OTHERWISE SPECIFIED:
1. ALL DIMENSIONS ARE IN mm
2. DIMENSION TOLERANCES ARE:
- LINEAR +/- 10mm.
- ANGLES: +/- 1°.
DONOT SCALE THIS DRAWING

CUSTOMER REVIEW / STATUS
( )FULLY APPROVED, NO CHANGES, PROCEED WITH FABRICATION
( )REVISE AS NOTED, RESUBMITTAL NOT REQ'D, PROCEED WITH FABRICATION
( )REVISE AS NOTED, RESUBMIT FOR APPROVAL, DO NOT PROCEED WITH FABRICATION
FULL APPROVAL REQUIRED BY DATE: _____
FULL APPROVAL IS REQUIRED BY THIS DATE IN ORDER TO AVOID SCHEDULED DELIVERY DATE. ANY VARIANCE FROM THIS DATE MAY CAUSE SIGNIFICANT DELIVERY DELAY AND/OR ADDITIONAL COST TO THE PROJECT. ANY CHANGES TO THE DESIGN AFTER FULL APPROVAL MAY ALSO CAUSE DELAYS AND/OR ADDITIONAL COSTS.
BY:_____ DATE:_____

DRAWN BY: LCS	CREATION DATE: 11 MAR 15
CHECKED BY: JRN	CHECKED DATE: 17 MAR 15
APPROVED BY: B.DUEK	APPROVED DATE: 13 MAR 15
PDF.BY: LCS	PDF. DATE: 12 MAR 15
DXF.BY:	DXF. DATE:

WESTEEL
STORAGE SOLUTIONS

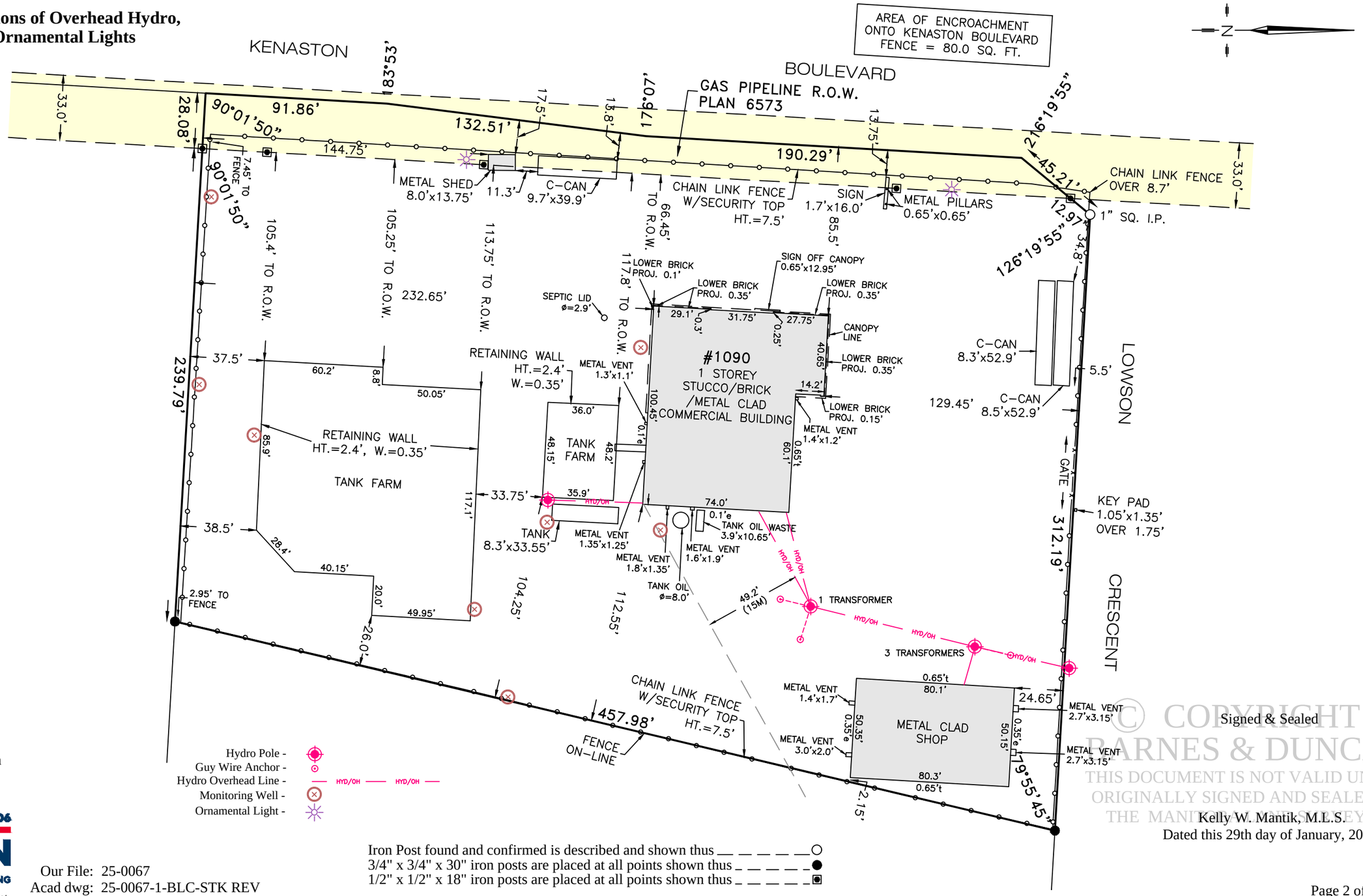
DRAWING DESCRIPTION: SUPPLEMENTARY VIEWS	LOCATION: 5064	REV: 0
CUSTOMER: ENVIROTECH SERVICES		SIZE
DRAWING / FILE No.: VSW 125000 25003479	SHEET 1.1	OF 5

Attachment C

Site Survey

Surveyor's Partial Staking and Building Location Certificate
1090 Kenaston Boulevard, Winnipeg

Revised to show Locations of Overhead Hydro, Monitoring Well and Ornamental Lights
February 20, 2025



Hydro Pole -
Guy Wire Anchor -
Hydro Overhead Line - HYD/OH HYD/OH
Monitoring Well -
Ornamental Light -

SKETCH - all distances are in feet and decimals of a foot.

Iron Post found and confirmed is described and shown thus
3/4" x 3/4" x 30" iron posts are placed at all points shown thus
1/2" x 1/2" x 18" iron posts are placed at all points shown thus

Signed & Sealed

Kelly W. Mantik, M.L.S.
Dated this 29th day of January, 2025

BARNES & DUNCAN 1906
SURVEYING, ENGINEERING & PLANNING
6 Donald Street, Winnipeg, MB, R3L 0K6
180-A, 5th Street, Morden, MB, R6M 1C9

Our File: 25-0067
Acad dwg: 25-0067-1-BLC-STK REV
Field Book: B&D 1621-47, 51
Drafter: AN

Attachment D

Limitations

Limitations

1. The work performed in the preparation of this report and the conclusions presented are subject to the following:
   a. The Standard Terms and Conditions which form a part of our Professional Services Contract;
   b. The Scope of Services;
   c. Time and Budgetary limitations as described in our Contract; and
   d. The Limitations stated herein.
2. No other warranties or representations, either expressed or implied, are made as to the professional services provided under the terms of our Contract, or the conclusions presented.
3. The conclusions presented in this report were based, in part, on visual observations of the Site and attendant structures. Our conclusions cannot and are not extended to include those portions of the Site or structures, which are not reasonably available, in WSP's opinion, for direct observation.
4. The environmental conditions at the Site were assessed, within the limitations set out above, having due regard for applicable environmental regulations as of the date of the inspection. A review of compliance by past owners or occupants of the Site with any applicable local, provincial or federal bylaws, orders-in-council, legislative enactments and regulations was not performed.
5. The Site history research included obtaining information from third parties and employees or agents of the owner. No attempt has been made to verify the accuracy of any information provided, unless specifically noted in our report.
6. Where testing was performed, it was carried out in accordance with the terms of our contract providing for testing. Other substances, or different quantities of substances testing for, may be present on-site and may be revealed by different or other testing not provided for in our contract.
7. Because of the limitations referred to above, different environmental conditions from those stated in our report may exist. Should such different conditions be encountered, WSP must be notified in order that it may determine if modifications to the conclusions in the report are necessary.
8. The utilization of WSP's services during the implementation of any remedial measures will allow WSP to observe compliance with the conclusions and recommendations contained in the report. WSP's involvement will also allow for changes to be made as necessary to suit field conditions as they are encountered.
9. This report is for the sole use of the party to whom it is addressed unless expressly stated otherwise in the report or contract. Any use which any third party makes of the report, in whole or the part, or any reliance thereon or decisions made based on any information or conclusions in the report is the sole responsibility of such third party. WSP accepts no responsibility whatsoever for damages or loss of any nature or kind suffered by any such third party as a result of actions taken or not taken or decisions made in reliance on the report or anything set out therein.
10. This report is not to be given over to any third party for any purpose whatsoever without the written permission of WSP.
11. Provided that the report is still reliable, and less than 12 months old, WSP will issue a third-party reliance letter to parties that the client identifies in writing, upon payment of the then current fee for such letters. All third parties relying on WSP's report, by such reliance agree to be bound by our proposal and WSP's standard reliance letter. WSP's standard reliance letter indicates that in no event shall WSP be liable for any damages, howsoever arising, relating to third-party reliance on WSP's report. No reliance by any party is permitted without such agreement.

22 May 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: **Responses to EAB Questions for Tank Farm Notice of Alteration**
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 May 6, 2025, seeking clarification on items related to GFL's Notice of Alteration (NoA), that was submitted to EAB on March 18, 2025. This letter will outline the question posed by EAB and provides GFL's corresponding response.

1. Please provide location and design details of the following:
    a. bulk truck/tanker off-loading pad(s);
    b. and secondary containment includes berm height, freeboard, floor slope, and sump. Additionally, please confirm that the secondary containment meets the required volumetric capacity.

    Design drawings are attached.

2. Please confirm if there will be replacement for process tanks P1 to P4 and explain how the removal of these tanks will affect the existing process;

    There will be no replacement for these tanks as the process of dewatering used oil has changed to avoid excessive heat and associated air emissions. The existing tanks P1 to P4 are now used as storage tanks for both waste and processed fuel. 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.

3. Please identify if there will be any changes to process tanks P5 to P8;

    Process tanks P5 to P8 inside Building A will also be removed as part of this NoA.

4. Please specify the method used to transfer processed oil from the process tank farm to the main/storage tank farm. What is the secondary containment for the transfer areas (from the storage to process tanks and bulk truck/tanker to storage tank);

   Waste fluids are transferred using the truck mounted pump to tank farm tanks using appropriately rated flexible hoses. Hose to hose connection is done through a cam lock. There are SOPs in place and additional containment practices in place (i.e., spill tray underneath the connection point). The transfer points into the tanks are located inside the berm area around the tank farm which has been designed for secondary containment. The spill trays provide an additional level of mitigation.

5. Please describe the fate of Monitoring Well (MW4), which appears to be located along the east property line near the proposed new tank farm;

   The monitoring well will be left in place, with a buffer of 2.0 m from the farm so that it can be accessed.

6. Please provide a description of the adjacent properties. Please identify any potential impacts on the surrounding and adjacent properties (due to the tank farms activities) and propose ways to mitigate those impacts.

Direction	Adjacent Property	Potential Impacts and Mitigation
North	Lowsen Crescent, A&W/Husky Card Lock across the road	Site operations are contained within a fenced compound. The tank farm is constructed in accordance with the applicable codes and standards. This includes ensuring the tank farm is sited at the required set back distances as outlined in the National Fire Code Section 4.3.2.1. The tank farm will have in place operational controls to minimize any potential hazards or risks associated with its operation.
East	Wallace and Wallace Fencing	
South	Foundations Buildings Materials	
West	Kenaston Boulevard, IKEA across the road	

7. Please correct the following inconsistencies in the NoA report, and resubmit the corrected version:
   a. the table on Page 3 lists volume of the new tanks as “24,000L,” which appears to be an error; and
   b. the number of existing tanks to be removed from the main tank is noted as “14” on Page 2 and Page 4 (section 1.1) and “15” on Page 3. Please clarify the correct number and indicate the fate of the horizontal storage tank (identified as Tank B1 in clause 58 of the licence) if only 14 tanks are to be removed.

   Corrected and resubmitted with this letter. Tank B1 will remain.

8. For new tanks such as Tank #3, the contents are listed as Waste Solvent, Waste Oil, and Waste Flammable Liquids. Are these wastes intended to be mixed, or will the tank be used alternately for each type?

    Tanks that have been identified as storing Class I Flammable Liquids (waste solvent, waste fuel) and Class II Combustible Fluids (waste oil), as defined by section 4.1.2.1. of the National Fire Code of Canada, can potentially contain mixed fluids. The process of producing alternative fuel allows for the addition of Class I fluids to the used oil therefore a mix of Class I and Class II fluids can occur as per the authorized process. Tanks that are identified as only containing Class II Combustible fluids will not be authorized to contain Class I Flammable fluids.

9. Will this alteration result in traffic interruption and changes to traffic volume (during the construction/ tanks removal/ tanks installation and operating stages), and is there a plan in place to mitigate any potential negative impacts on the surrounding community?

    The removal of the existing tank farm and the construction of the new tank farm does not result in changes to the traffic volumes. The construction of the new tank farm and decommissioning of the existing tank farm is being scheduled to reduce the potential for increased traffic or traffic concerns to the surrounding area – i.e., outside of peak traffic flow times in the area.

10. As per section 4.3.2.2. of the National Fire Code (2020), the minimum distance between every combination of two aboveground storage tanks shall be 0.25 times the sum of their diameters, but shall be not less than 1 m. Please confirm that this requirement is met in your design plan.

    Section 1.3 of the NoA addresses the minimum distance required as per Section 4.3.2 of the NFC.

11. Does the proposed liner material (LLDPE) meet the requirements for secondary containment? Please provide documentation demonstrating that the proposed liner meets the relevant regulatory or industry standards for secondary containment. Please also comment on the compatibility of the LLDPE liner material with the type of waste being stored in the tank.

    The liner that is being proposed follows the ULC “Standard for Liners Used for Secondary Containment of Aboveground Flammable and Combustible Liquid Tanks.” The standard outlines the minimum requirements for the material properties and performance of liners used for secondary containment under and around the area of tanks that are installed above ground for the storage of flammable liquids and combustible liquids. Liners used for secondary containment are intended for permanent installation to contain spills or leakage of product for a temporary period. Specifications and drawings are attached.

12. Is the proposed tank material compatible with the types of waste to be stored or processed? Please provide supporting information to confirm that the proposed tank material complies with applicable standards. Additionally, clarify whether the aboveground storage tanks will be filled manually or automatically. We also noted that Drawing No. VSW 125000 25003479 references ULC S601; however, some tanks are intended to store used oil, which may require compliance with ULC S652. Please clarify.

    The CAN/ULC-S601-14 is a National Standard of Canada that focuses on aboveground steel tanks used for flammable and combustible liquids The standard is applicable to the storage of flammable and combustible liquids, which can include used oil, and is not limited to specific types of oil. The standard covers tanks that are fabricated, inspected, and tested for leakage before shipment. Westeel uses this standard for the construction of both single walled and double walled tanks. As noted in the standard these tanks are designed for use in stationary installations. The specific gravity of liquids to be stored in the tanks cannot be greater than 1.0. The specific gravity of used oil typically falls within the range of 0.8 to 1.0.

13. Please comment on the susceptibility of the tanks to side wall buckling due to strong winds. What standards are followed to construct them such that their structural integrity is not compromised due to wind?

    The tanks that are being installed have been constructed by Westeel in compliance with the ULC standard S601. These tanks are engineered with high-quality materials and construction techniques to ensure structural integrity, including using superior quality carbon steel like ASTM A1011 or A36. Westeel tanks undergo rigorous testing, including pressurized air tests and liquid soap seam tests, to confirm their integrity.

14. Please provide information about the proposed overfill prevention and corrosion protection for the tank farm.

    The ULC Standards for overfill prevention and corrosion protection as required under the various regulatory requirements, such as the B139 Series and the CCME Guidelines, will be in place for the new tank farm, which is consistent to what is currently in place for the existing tank farm.

If you require any additional information, please contact the undersigned at 780-805-6107 or cprichard@gflenv.com.

Yours Sincerely,

GFL Environmental Services Inc.

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

cc: Colin Dutton, Ray Poppl

NOTES:
Refer to ENG-TECH Geotechnical Report 25-166-17
(4.2. Foundation / 4.2.1 Compacted Granular Pad)

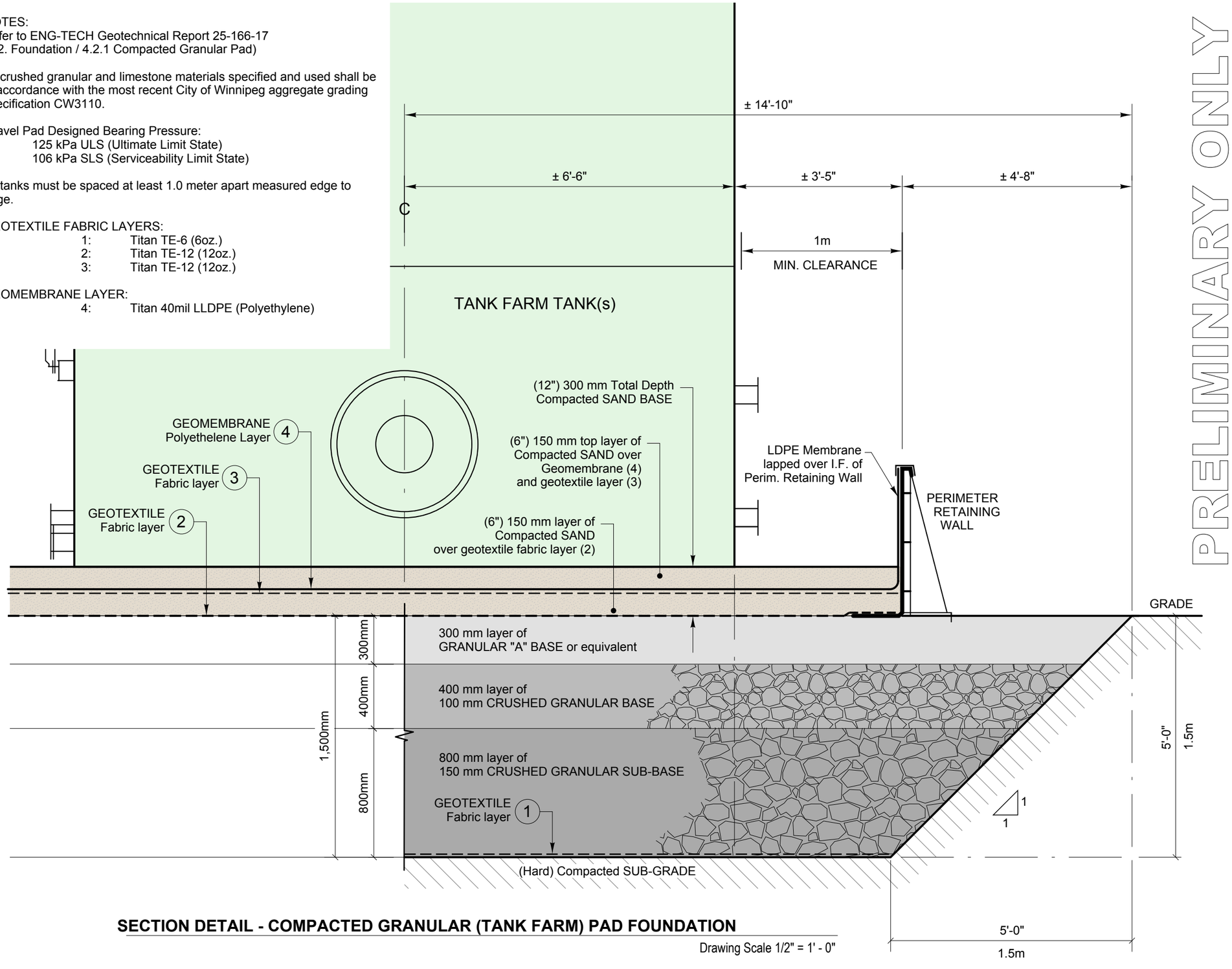
All crushed granular and limestone materials specified and used shall be in accordance with the most recent City of Winnipeg aggregate grading specification CW3110.

Gravel Pad Designed Bearing Pressure:
125 kPa ULS (Ultimate Limit State)
106 kPa SLS (Serviceability Limit State)

All tanks must be spaced at least 1.0 meter apart measured edge to edge.

GEOTEXTILE FABRIC LAYERS:
1: Titan TE-6 (6oz.)
2: Titan TE-12 (12oz.)
3: Titan TE-12 (12oz.)

GEOMEMBRANE LAYER:
4: Titan 40mil LLDPE (Polyethylene)



SECTION DETAIL - COMPACTED GRANULAR (TANK FARM) PAD FOUNDATION

Drawing Scale 1/2" = 1' - 0"

PRELIMINARY ONLY

Design-Build:

VALLEY BUILDERS
Box 157 Morris, MB. R0G 1K0
Ph: 204.746.8792
Email: info@valleybuilders.ca

MAY 17 / 2025 DRAFT 03

Revision	Date	Description	By

Project Title

GFL Environmental Services Inc.

1090 KENASTON BLVD.
Winnipeg, MB

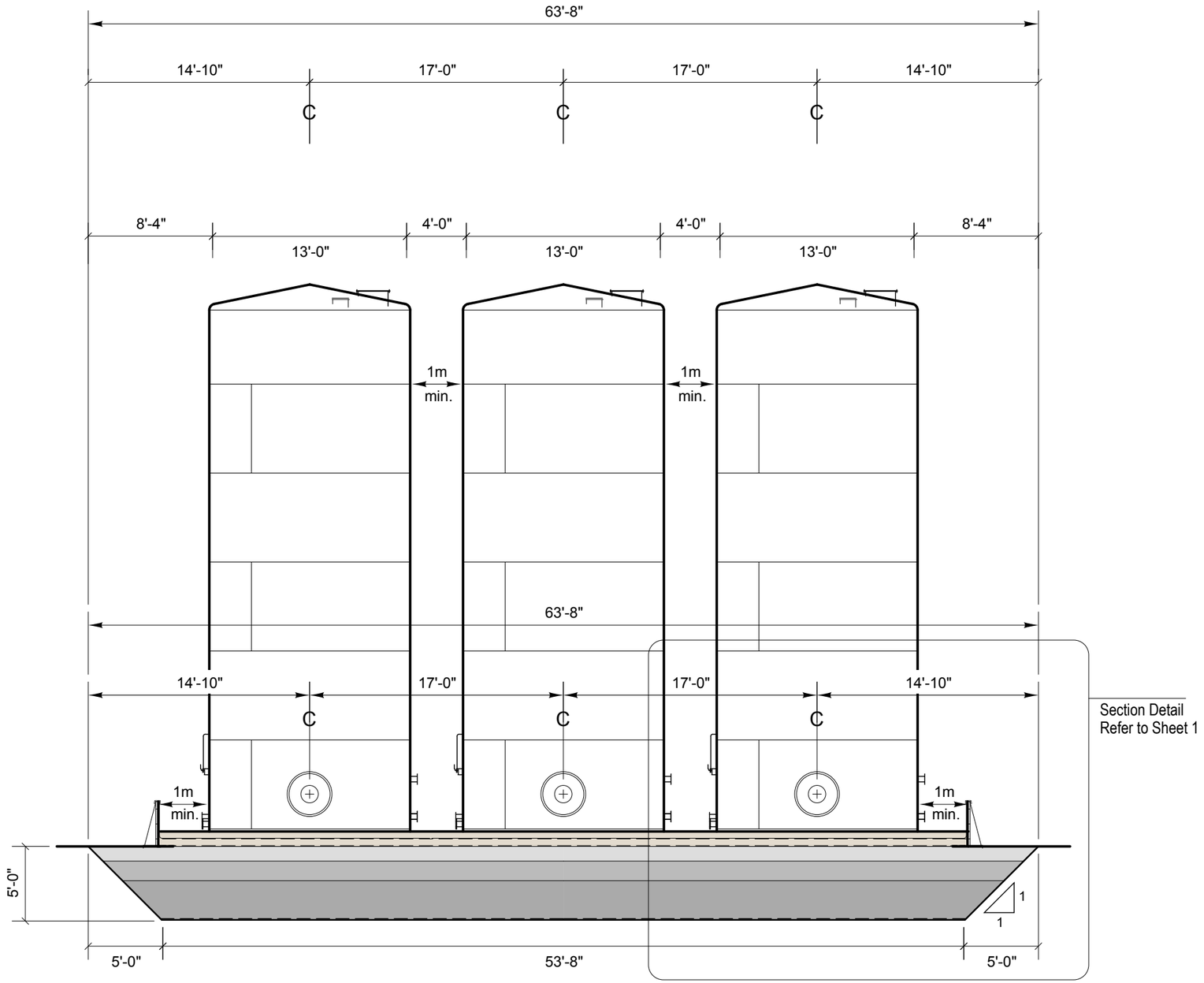
Sheet Title

GRANULAR PAD FOUNDATION DETAIL

Drawn By: TW
Drawing Date: MAY 17 / 2025
Checked By: TW

Sheet No.
1

Print Data: 100% TABLOID paper:11" x 17"



SECTION - COMPACTED GRANULAR (TANK FARM) PAD FOUNDATION

Drawing Scale 1/4" = 1' - 0"

PRELIMINARY ONLY

Design-Build:

VALLEY BUILDERS

Box 157 Morris, MB. R0G 1K0
Ph: 204.746.8792
Email: info@valleybuilders.ca

Revision	Date	Description	By
	MAY 17 / 2025	DRAFT 03	

Project Title

GFL Environmental Services Inc.

1090 KENASTON BLVD.
Winnipeg, MB

Sheet Title

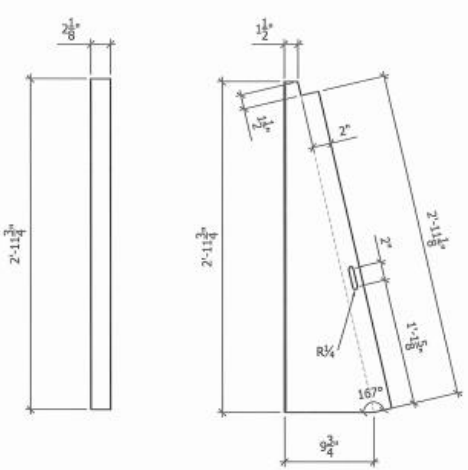
GRANULAR PAD FOUNDATION SECTION

Drawn By:	TW
Drawing Date:	MAY 17 / 2025
Checked By:	TW

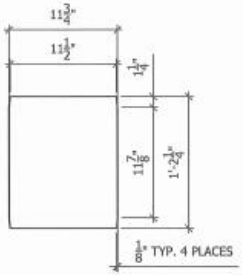
Sheet No.

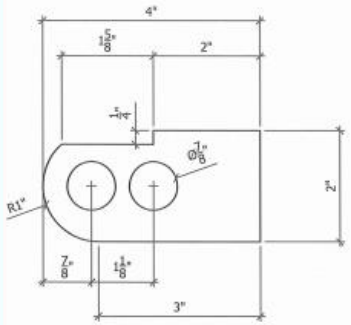
2

Print Data: 100% TABLOID paper:11" x 17"



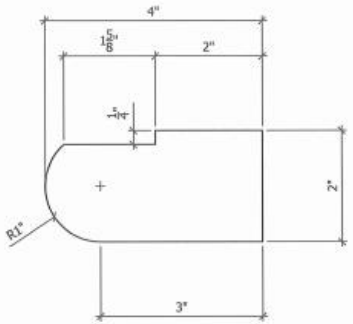
1 LEG DETAILS
1" = 1'-0"





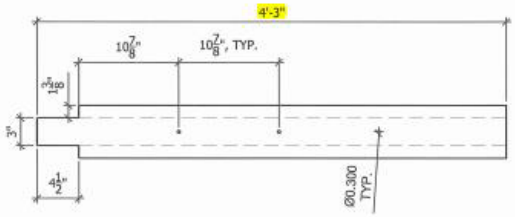
Holes

2 CLIP DETAIL
6" = 1'-0"

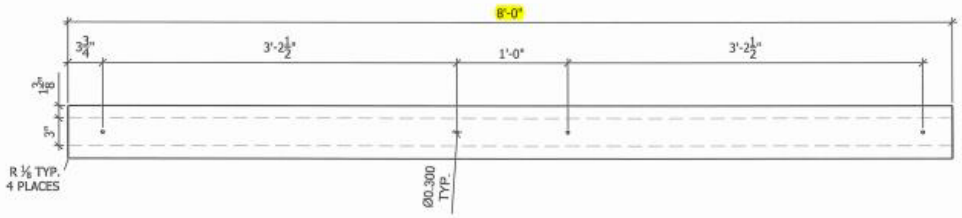


No Holes

3 CLIP DETAIL
6" = 1'-0"



4 4' RIDGE CAP DETAIL
1" = 1'-0"



5 8' RIDGE CAP DETAIL
1" = 1'-0"

BAR Engineering
t: (780) 875-3583
t: (780) 875-2728
e: INFO@BAReng.ca
www.BAReng.ca
6004 - 50th Avenue
Lloydminster, AB
T9V 2T9

SURETUF CONTAINMENTS LTD.
www.suretuf.com

[redacted]

[redacted]

FLUID SECONDARY CONTAINMENT SYSTEM

ALBERTA

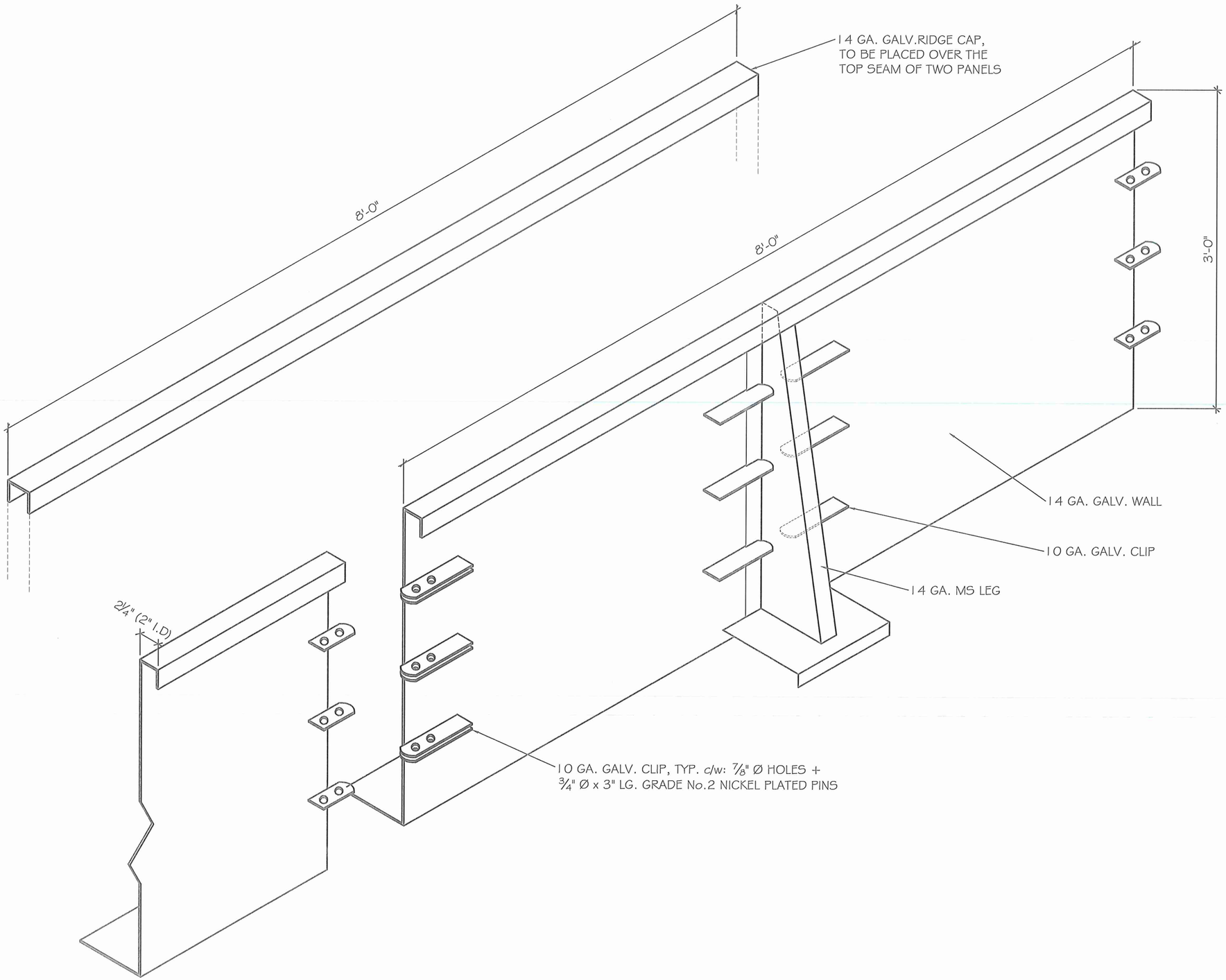
COMPONENT DETAILS (36" WALL)

12-3130

AS SHOWN

RH

S1.2



1 ISOMETRIC VIEW
1" = 1'-0"

Consultant:
BAR Engineering
t: (780) 875-1683
f: (780) 875-2728
e: INFO@BAReng.ca
www.BAReng.ca
6004 – 50th Avenue
Lloydminster, AB
T9V 2T9

Client:
PATENT # 2362105
SURETUF CONTAINMENTS LTD.
www.suretuf.com

[redacted]

[redacted]

Seals:

No.	Description	Drn.	Chk.	Appr.	Date:
1	ISSUED FOR CONSTRUCTION	BA	RH	-	SEP 11 '12
0	ISSUED FOR REVIEW	BA	RH	-	AUG 29 '12

Drawing Revisions:

Project:
FLUID SECONDARY CONTAINMENT SYSTEM

Location:
ALBERTA

Drawing Name:
36" WALL STRUCTURAL ISO VIEW

Project No.: 12-3130
Scale: AS SHOWN
Leader: RH
Drawing No.: S1.1

TE-6

6oz CIVIL NONWOVEN GEOTEXTILE

TITAN
BUILD YOUR LEGEND

Titan has provided the containment and erosion control industries with the highest quality geotextiles available. Our nonwoven needle punched geotextiles are manufactured using polypropylene fibers, which are formed into a dimensionally stable network which allows the fibers to maintain their relative position. These products resist ultraviolet deterioration, rotting, biological degradation, and are inert to commonly encountered soil chemicals.

TESTED PROPERTY	TEST METHOD	UNIT ENGLISH (METRIC)	VALUE ENGLISH (METRIC)
Grab Tensile	ASTM D 4632	lbs (N)	160 (712)
Grab Elongation	ASTM D 4632	%	50
CBR Puncture Resistance	ASTM D 6241	lbs (N)	410 (1825)
Trapezoid Tear	ASTM D 4533	lbs (N)	60 (267)
Permittivity*	ASTM D 4491	1/sec	1.5
Water Flow*	ASTM D 4491	gal/min/ft² (l/min/m²)	110 (4482)
Apparent Opening Size (AOS)	ASTM D 4751	US Sieve (mm)	70 (0.212)
U.V. Resistance	ASTM D4355	%/hrs	70/500
TYPICAL ROLL DIMENSIONS			
Roll Width		ft	12.5 x 360 15 x 300
Roll Area		yd²	500
Estimated Roll weight		lbs	200

NOTES:
MARV. Minimum Average Roll Value.
Maximum average roll value ASTM D 4751- AOS.
Mullen Burst ASTM D 3768 has been removed. It is not recognized by ASTM D 35 on Geosynthetics.
Puncture ASTM D 4833 has been removed. It is not recognized by AASHTO M288 and has been replaced with CBR Puncture ASTM D 6241.

***At the time of manufacturing. Handling may change these properties**

Titan Environmental Containment

Toll free: 1-866-327-1957 | info@titanenviro.com | **TitanEnviro.com**

Rev. January 2024

TE-12

12oz CIVIL NONWOVEN GEOTEXTILE

TITAN
BUILD YOUR LEGEND

Titan has provided the containment and erosion control industries with the highest quality geotextiles available. Our nonwoven needle punched geotextiles are manufactured using polypropylene fibers, which are formed into a dimensionally stable network which allows the fibers to maintain their relative position. These products resist ultraviolet deterioration, rotting, biological degradation, and are inert to commonly encountered soil chemicals.

TESTED PROPERTY	TEST METHOD	UNIT ENGLISH (METRIC)	VALUE ENGLISH (METRIC)
Grab Tensile	ASTM D 4632	lbs (N)	300 (1335)
Grab Elongation	ASTM D 4632	%	50
CBR Puncture Resistance	ASTM D 6241	lbs (N)	825 (3671)
Trapezoid Tear	ASTM D 4533	lbs (N)	115 (511)
Permittivity*	ASTM D 4491	1/sec	1.0
Water Flow*	ASTM D 4491	gal/min/ft² (l/min/m²)	75 (3055)
Apparent Opening Size (AOS)	ASTM D 4751	US Sieve (mm)	100 (0.150)
UV Resistance	ASTM D 4355	%/hrs	70/500
TYPICAL ROLL DIMENSIONS			
Roll Dimensions		ft	12.5 x 360 15 x 300
Roll Area		yd²	500
Estimated Roll weight		lbs	375

NOTES:
MARV. Minimum Average Roll Value.
Maximum average roll value ASTM D 4751 - AOS.
Mullen Burst ASTM D 3768 has been removed. It is not recognized by ASTM D 35 on Geosynthetics.
Puncture ASTM D 4833 has been removed. It is not recognized by AASHTO M288 and has been replaced with CBR Puncture ASTM D 6241.

***At the time of manufacturing. Handling may change these properties**

Titan Environmental Containment

Toll free: 1-866-327-1957 | info@titanenviro.com | **TitanEnviro.com**

Rev. January 2024

TITAN 40MIL LLDPE

LLDPE Smooth Geomembrane

TITAN
BUILD YOUR LEGEND

Titan's 40mil polyethylene is produced from virgin polyethylene resins. It has outstanding flexibility and elongation characteristics. Titan's 40mil Polyethylene contains approximately 97.5% polymer and 2.5% carbon black, antioxidants, and heat stabilizers, and contains no additives, fillers, or extenders. Titan's 40mil Polyethylene does not contain plasticizers which can migrate to the surface, causing premature aging. Manufactured from virgin polyethylene resins, it is designed to provide a high-quality, economical Geomembrane.

TESTED PROPERTY	TEST METHOD	UNIT ENGLISH (METRIC)	VALUE ENGLISH (METRIC)
Thickness	ASTM D 5199	mil (mm)	41.5 (1.04)
Density	ASTM D 1505	g/cm^3	0.939
Tensile Strength – Strength at Break	ASTM D 6693	lb/in-width (kN/m)	185 (32)
Tensile Strength – Elongation at Break	ASTM D 6693	%	875
Tear Resistance	ASTM D 1004	lb (N)	27
Puncture Resistance	ASTM D 4833	lb (N)	75
Dimensional Stability	ASTM D 1204	%	< 2
Carbon Black Content	ASTM D 1603	%	> 2.5
Hydrostatic Resistance	ASTM D 751	psi	250
Volatile Loss Method A	ASTM D 1203	%	< 1
Low Temp. Impact Failure	ASTM D 746	˚F	< -94
Resistance to Soil Burial	ASTM D 3083	%	± 10
Environmental Stress Crack Resistance Hours to Failure	ASTM D 5397	hrs	> 400
Perms	ASTM E96	grains/ft^2/hr/in Hg.	0.022
Bonded Seam Strength	ASTM D 4645	lbf/in width	80
Seam Peel Adhesion	AST MD 4645	lbf/in width	69

Titan Environmental Containment

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Rev. August 2023