

Environmental Stewardship Division Environmental Approvals Branch 1007 Century St. Winnipeg, Manitoba R3H 0W4 T 204 945-8321 **F** 204 945-5229

March 12, 2021

File No.: 5684.00

Linda Gammon Quality Coordinator Urbanmine Inc. 72 Rothwell Road Winnipeg MB R3P 2H7 <u>linda@urbanmine.ca</u>

Re: Environment Act Licence No. 3199 R

Dear Linda Gammon:

Enclosed is revised Environment Act Licence No. 3199 R, issued to Urbanmine Inc. The Licence is for the continued operation of the Development being a scrap metal processing facility located at 72 Rothwell Road and 207 Lowson Crescent in the City of Winnipeg.

The facility operates in accordance with the Proposal dated April 30, 2014, additional information dated August 15, 2014, December 16, 2014, April 7, 2015, Notice of Alteration dated March 7, 2019, additional information dated October 5, 2020, October 30, 2020 and subject to the specifications, limits, terms and conditions included in the enclosed licence.

In addition to the enclosed Licence requirements, please be informed that all other applicable federal, provincial and municipal regulations and by-laws must be complied with. A Notice of Alteration must be filed with the Director for approval prior to any alteration to the Development as licensed.

Should you have any questions on this matter, please contact Nada Suresh, Acting Regional Supervisor, Manitoba Conservation and Climate at <u>Nada.Suresh@gov.mb.ca</u> or 204-945-8214.

Pursuant to Section 27 of The Environment Act, this licensing decision may be appealed by any person who is affected by the issuance of this licence to the Minister of Conservation and Climate within 30 days of the date of the licence.

Sincerely,

Original Signed By Shannon Kohler, Director The Environment Act

cc: Kristal Harman, Yvonne Hawryliuk, Nada Suresh - Environmental Compliance and Enforcement Siobhan Burland Ross, Eshetu Beshada - Environmental Approvals Public Registries

THE ENVIRONMENT ACT LOI SUR L'ENVIRONNEMENT



LICENCE

File No.: 5684.00

Licence No. / Licence n°: Issue Date / Date de délivrance: Revised: 3199 R September 8, 2016 March 12, 2021

In accordance with The Environment Act (C.C.S.M. c. E125) / Conformément à la Loi sur l'environnement (C.P.L.M. c. E125)

Pursuant to Section 10(1) and 14(2)/ Conformément au Paragraphe 10(1) et 14(2)

THIS LICENCE IS ISSUED TO:/CETTE LICENCE EST DONNÉE À:

URBANMINE INC.; "the Licencee"

for the continued operation of the Development being a scrap metal processing facility located at 72 Rothwell Road and 207 Lowson Crescent (Lot 16, Plan 9153 and Lot 2, Plan 18862 W.L.T.O., in O.T.M. Lots 60 to 63 Parish of St. Boniface) in Winnipeg, Manitoba in accordance with the Proposal dated April 30, 2014, additional information dated August 15, 2014, December 16, 2014 (with attachment of Dillon Consulting Noise, Vibration, and Air Quality Report), April 7, 2015 (with attachment of Dillon Consulting Acoustic Modeling Assessment Report), Notice of Alteration dated March 7, 2019, additional information dated October 5, 2020, October 30, 2020 and subject to the following specifications, limits, terms and conditions:

DEFINITIONS

In this Licence;

"accredited laboratory" means an analytical facility accredited by the Standards Council of Canada (SCC), or accredited by another accrediting agency recognized by Manitoba Conservation and Climate to be equivalent to the SCC, or be able to demonstrate, upon request, that it has the quality assurance/quality control (QA/QC) procedures in place equivalent to accreditation based on the international standard ISO/IEC 17025, or otherwise approved by the Director;

"affected area" means a geographical area, excluding the property of the Development;

"approved" means approved by the Director or assigned Environment Officer in writing;

"contaminant" means a contaminant as defined in The Dangerous Goods Handling and Transportation Act, and The Environment Act as amended from time to time;

"Closure Plan" means a plan indicating the actions to be taken for the closure of the Development;

Urbanmine Inc. Licence No. 3199 R Page 2 of 15

"commissioning" means when the process of all systems and components of each of the ferrous and nonferrous equipment installed are tested according to the operational requirements and ready for the intended operation;

"dangerous good" means a product, substance or organism as defined in The Dangerous Goods Handling and Transportation Act, or any amendments thereto;

"days" means calendar days unless otherwise indicated;

"Director" means an employee so designated pursuant to The Environment Act;

"Environment Officer" means an employee so designated pursuant to The Environment Act;

"fugitive emissions" means particulate matter escaping from sources within the development property into the atmosphere other than through any of the emission stacks or vents;

"hazardous waste" means a product, substance or organism as defined in The Dangerous Goods Handling and Transportation Act, or any amendments thereto;

"licenced carrier" means a person who has a valid licence to transport hazardous waste pursuant to Hazardous Waste Regulation under The Dangerous Goods Handling and Transportation Act (C.C.S.M.c. D12), as amended from time to time;

"noise nuisance" means an unwanted sound, in an affected area, which is annoying, troublesome, or disagreeable to a person:

- a) residing in an affected area;
- b) working in an affected area; or
- c) present at a location in an affected area which is normally open to members of the public; if the unwanted sound
 - d) is the subject of at least 5 written complaints, received by the Director in a form satisfactory to the Director and within a 90-day period, from 5 different persons falling within clauses a), b), or c), who do not live in the same household; or
 - e) is the subject of at least one written complaint, received by the Director in a form satisfactory to the Director, from a person falling within clauses a), b), or c) and the Director is of the opinion that if the unwanted sound had occurred in a more densely populated area there would have been at least 5 written complaints received within a 90-day period, from 5 different persons who do not live in the same household;

"odour nuisance" means a continuous or repeated odour, smell or aroma, in an affected area, which is offensive, obnoxious, troublesome, annoying, unpleasant, or disagreeable to a person:

- a) residing in an affected area;
- b) working in an affected area; or

c) present at a location in an affected area which is normally open to members of the public; if the odour, smell or aroma

- d) is the subject of at least 5 written complaints, received by the Director in a form satisfactory to the Director and within a 90-day period, from 5 different persons falling within clauses a), b), or c), who do not live in the same household; or
- e) is the subject of at least one written complaint, received by the Director in a form satisfactory to the Director, from a person falling within clauses a), b), or c) and the Director is of the opinion that if the odour, smell or aroma had occurred in a more densely populated area

Urbanmine Inc. Licence No. 3199 R Page 3 of 15

there would have been at least 5 written complaints received within a 90-day period, from 5 different persons who do not live in the same household;

"opacity" means the degree to which emissions reduce the transmission of light and obscure the view of an object in the background;

"operator" means the company or person who is responsible for the day-to-day maintenance and operation of the Development;

"particulate matter" means any finely divided liquid or solid matter other than water droplets;

"particulate residue" means that part or portion of an atmospheric emission which is deposited onto a surface;

"point source" means any point of emission from a Development where pollutants are emitted to the atmosphere by means of a stack;

"pollutant" means a pollutant as defined in The Environment Act;

"Post-Closure Plan" means a plan indicating the actions to be taken for the care, maintenance, and monitoring of the Development after closure, that will prevent, mitigate, or minimize the threat to public health and the environment;

"QA/QC" means quality assurance/quality control;

"registered generator" means a person who is registered as a hazardous waste generator pursuant to Hazardous Waste Regulation under The Dangerous Goods Handling and Transportation Act, as amended from time to time;

"solid waste" means solid waste as defined in the Waste Management Facilities Regulation, or any future amendments thereto;

"stack" means a duct, pipe, chimney, vent, opening or other structure through which pollutants are emitted to the atmosphere;

"Standard Methods for the Examination of Water and Wastewater" means the most recent edition of Standard Methods for the Examination of Water and Wastewater published jointly by the American Public Health Association, the American Waterworks Association and the Water Environment Federation;

"used oil" means petroleum-derived or synthetic lubrication oil that has become unsuitable for its original purpose due to the presence of physical or chemical impurities or the loss of original properties if the oil falls within any of the following categories:

- a) lubrication oils for internal combustion engines such as motor oil, vehicle crankcase oil and engine lubricating oil;
- b) transmission fluids, gearbox and differential oils; and
- c) hydraulic fluids;

"used oil filter" means an oil filter that contains or contained used oil;

"waste battery" means a battery or cell that:

- a) through use, storage, handling, defect, damage, expiry of shelf life or other similar circumstance can no longer be used for its original purpose; or
- b) for any other reason, the owner or person in possession of the battery intends to dispose of it; and

"wastewater" means any liquid containing a pollutant as defined in The Environment Act, associated with or resulting from the Development which is discharged into the environment.

GENERAL TERMS AND CONDITIONS

This Section of the Licence contains terms and conditions intended to provide guidance to the Licencee in implementing practices to ensure that the environment is maintained in such a manner as to sustain a high quality of life, including social and economic development, recreation and leisure for present and future Manitobans.

- 1. The Licencee shall at all times maintain a copy of this licence at the Development or at the premises from which the Development's operations are managed.
- 2. The Licencee shall implement a high standard of equipment maintenance and good housekeeping and operational practices with respect to the Development, at all times.
- 3. The Licencee shall reduce the production and dissemination of wastes by initiating and maintaining waste reduction and waste recycling programs.
- 4. In addition to any of the limits, terms and conditions specified in this Licence, the Licencee shall, upon the request of the Director:
 - a) sample, monitor, analyze and/or investigate specific areas of concern regarding any segment, component or aspect of pollutant storage, containment, treatment, handling, disposal or emission systems, for such pollutants or ambient quality, aquatic toxicity, leachate characteristics and discharge or emission rates, for such duration and at such frequencies as may be specified;
 - b) determine the environmental impact associated with the release of any pollutant(s) from the Development;
 - c) conduct specific investigations in response to the data gathered during environmental monitoring programs; or
 - d) provide the Director, within such time as may be specified, with such reports, drawings, specifications, analytical data, descriptions of sampling and analytical procedures being used, bioassay data, flow rate measurements and such other information as may from time to time be requested.
- 5. The Licencee shall, unless otherwise specified in this Licence:
 - a) carry out all preservations and analyses on liquid samples in accordance with the methods prescribed in the most current edition of Standard Methods for the Examination of Water and Wastewater or in accordance with equivalent preservation and analytical methodologies approved by the Director;
 - b) carry out all sampling of, and preservation and analyses on, soil and air samples in accordance with methodologies approved by the Director;
 - c) have all analytical determinations undertaken by an accredited laboratory; and

Urbanmine Inc. Licence No. 3199 R Page 5 of 15

- d) report the results to the Director, in writing and in an electronic format acceptable to the Director, within 60 days of the samples being taken.
- 6. The Licencee shall maintain the complaint management plan dated November 10, 2016 as approved by the Director.
- 7. Notwithstanding Clause 6, the Licencee shall, at the Licencee's preference or upon written request from the Director, submit for approval a revised or modified complaint management plan and implement the approved plan.
- 8. The Licencee shall submit a written notification to the Director within 14 days of completing each of the ferrous and nonferrous equipment commissioning tests.
- 9. The Licencee shall designate an employee, within 14 days of the date of issuance of this Licence, as the Licencee's Environmental Coordinator, whose job description will include assisting the Licencee in complying with the limits, terms and conditions in this Licence and assisting Senior Management of the Licencee to manage environmental issues at the Development. The name of the Environmental Coordinator shall be submitted in writing to the Director within 14 days of appointment and any subsequent appointment.

SPECIFICATIONS, LIMITS, TERMS, AND CONDITIONS

Respecting Waste Battery and Used Oil filter Operations

- 10. The Licencee shall not receive at the facility any hazardous waste other than waste batteries and used oil filters.
- 11. The Licencee shall store all waste batteries and used oil filters in an area that is:
 - a) secure, not accessible to unauthorized personnel; and
 - b) clearly marked as a hazardous waste storage area using a conspicuous sign.
- 12. The Licencee shall, unless otherwise specified by this Licence, retain all records relating to this Licence during the full life of operation of the facility, and after closure, for such period of time as may be specified by the Director. Records may be transferred from their original form to other accepted forms for information storage. These records shall be made available to an Environment Officer upon request.
- 13. The Licencee shall transport waste batteries and used oil filters to or from the facility only when the hazardous waste is accompanied by a hazardous waste movement document, or a dangerous goods shipping document, as appropriate.
- 14. The Licencee shall use only licensed carriers to transport waste batteries and used oil filters.

Respecting Waste Batteries

- 15. The Licencee shall initiate and maintain a record for all waste batteries received at the facility. The record shall contain the following, for each day that waste batteries are received:
 - a) date of receipt;
 - b) name and address of the licenced carrier;

- c) quantity of batteries received;
- d) source of the batteries; and
- e) the Manitoba Generator Registration Number for each source of waste batteries, where applicable.
- 16. The Licencee shall make available for inspection by an Environment Officer upon request a summary of the records referred to in Clause 15 of this Licence.
- 17. The Licencee shall not allow the inventory of waste batteries to exceed 5000 at any one time.
- 18. The Licencee shall store the waste batteries at least 7 meters from any drain in the storage area of the facility that lead directly or indirectly to a sewer system so that a spill or leak of acid will not enter into the sewer system.
- 19. The Licencee shall store the waste batteries in an area where the floor is resistant to acid and the area is provided with containment.
- 20. The Licencee shall store waste batteries according to the instruction provided in Appendix A of this licence.
- 21. The Licencee shall conspicuously place in the waste battery storage area effective neutralizing materials, or materials approved by the Director in writing, for the containment or clean up of spills.
- 22. The Licencee shall transport all waste batteries received at the facility within Sixty (60) days to a recycling or disposal facility operating under the authority of a Licence issued pursuant to The Dangerous Goods Handling and Transportation Act in Manitoba, or under an approval of similar type in another jurisdiction.

Respecting Used Oil filters

- 23. The Licencee shall not store used oil filters for a period exceeding 90 days from the date of receipt of the used oil filters at the facility.
- 24. The Licencee shall not receive used oil filters at the facility from commercial or industrial generators that are not registered generators.
- 25. The Licencee shall recycle all used oil filters received at the facility.
- 26. The Licencee shall process any used oil filters that are received and have not already been drained by:
 - a) Puncturing the top of the filter;
 - b) Placing the filter in a tray and allowing it to drain for 24 hours; and
 - c) Crushing the filter to a minimum of 75% volume compaction.
- 27. The Licencee shall maintain records of the following requirements:
 - a) the movement document;
 - b) the annual hazardous waste reports; and
 - c) the number, or weight of used oil filters treated at the facility.

Urbanmine Inc. Licence No. 3199 R Page 7 of 15

28. The Licencee shall make available for review by an Environment Officer, upon request, the records referred to in Clause 27 of this Licence.

Respecting Waste Batteries and Used Oil Filters Operations Inspection

- 29. The Licencee shall conduct regular inspections of the facility on a monthly basis to ensure that all pieces of equipment and the storage and treatment operations are operated in a manner that will not negatively impact the environment. Any deficiencies detected during these regular inspections, that might negatively impact the environment shall be promptly corrected. The inspection must include, as applicable, an observation of the following:
 - a) the condition of every hazardous waste container and all piping and ancillary equipment;
 - b) the condition of the secondary containment system and of any other mechanism that prevents the release of hazardous waste; and
 - c) any indications of a release of hazardous waste or of any deterioration of containers, piping, ancillary equipment or a secondary containment system that increases the likelihood of a release.
- 30. The Licencee shall record each inspection required by Clause 29 of this Licence. The record shall include the date of the inspection, the name of the person who conducted the inspection, the observations made by that person during the inspection and recommendations for remedial action and actions undertaken.
- 31. The Licencee shall make available the records of the inspection required by Clause 29 to an Environment Officer upon request.

Community Liaison Committee

32. The Licencee shall maintain the Community Liaison Committee (CLC) established in accordance with the terms of reference provided in Appendix B. The Licencee shall notify the Director or the Environment Officer in writing when the CLC meetings takes place.

Respecting Noise Management

- 33. The Licencee shall not cause or permit a noise nuisance to be created as a result of the construction, operation, or alteration of the development, and shall take such steps as the Director may require to eliminate or mitigate a noise nuisance.
- 34. The Licencee shall maintain a noise management program consisting of, but not limited to:
 - a) an education program for suppliers regarding acceptable scrap materials;
 - b) thorough inspection to characterize all inbound scrap metal loads;
 - c) awareness of new noise reduction and explosion prevention technologies;
 - d) an operator training program in accordance with Clause 39 of this Licence; and
- 35. The Licencee shall implement a material handling equipment operating procedure so that scrap metals are placed instead of dropped at all times.
- 36. The Licencee shall implement the noise pollution mitigation measures dated April 7, 2015 and October 5, 2020 (as set out in the Dillon Consulting' Acoustic Assessment Report dated March 2015, and September 2020) or alternative mitigation measures as approved by the Director by March 31, 2022 or as otherwise abbreviated or extended by the Director and provide written

Urbanmine Inc. Licence No. 3199 R Page 8 of 15

notification to the Director of the progress of the implementation every 90 days. The first progress report shall be submitted by March 31, 2021 that include a work plan with specific deadline dates for implementing the proposed mitigation measures.

- 37. The Licencee shall:
 - a) submit for the Director's approval a noise pollution monitoring plan within 60 days of the issuance of the revised licence;
 - b) carry out the monitoring plan approved pursuant to Clause 37 a) of this Licence within a timeframe approved by the Director; and
 - c) submit, upon the request of the Director, a revised or updated noise pollution monitoring plan for approval.
- 38. The Licencee shall submit a report, for the approval of the Director, of the completed monitoring plan approved pursuant to Clause 37 of this Licence, within 60 days of receipt of the analytical results of that monitoring plan. The report shall contain at minimum the following:
 - a) the raw data collected;
 - b) a discussion of the sampling and analytical portions of the program including any anomalies of sampling and analysis;
 - c) the QA/QC program; and
 - d) other issues as may be determined by the Director.

Respecting Facility Operators Training

- 39. The Licencee shall maintain an operators training program consisting of, but not limited to the following:
 - a) review of the licence terms and conditions;
 - b) training on operational procedures to be provided to new employees and regularly to all existing staff to minimize noise pollution and to meet the requirements of the noise management program pursuant to Clause 34;
 - c) routine review of any complaint received due to the operation;
 - d) transportation of dangerous goods; and
 - e) procedures pertaining to spill response and clean up;
- 40. The Licencee shall maintain a log of the training performed in accordance with Clause 39 of this Licence. The log shall be approved by the Environmental Coordinator and kept at the Development and shall be available for review upon request by an Environment Officer.

Respecting Facility Hours of Operation

- 41. The Licencee shall limit the hours of operation as follows:
 - a) All outside operations at the Development shall be limited to the hours between 7 a.m. and 7 p.m;
 - b) The operation of the slow moving shear equipment, EZ crusher, shear equipment or any material handling involving Liebherr Mobile Crane or similar equipment as specified by the Director shall be limited to weekdays between 7 a.m. and 5 p.m; and
 - c) The ferrous and nonferrous processing line shall not be operated on weekends and holidays, unless approved by the Director.
 - d) Should the Licencee wish to operate the Development on a weekend, satisfactory rationale shall be submitted to the Director or Environment Officer for their review and approval.

Urbanmine Inc. Licence No. 3199 R Page 9 of 15

Respecting Air Emissions

- 42. The Licencee shall not emit particulate matter from the Development such that:
 - a) particulate matter:
 - exceeds 0.23 grams per dry standard cubic metre calculated at 25 degrees Celsius and 760 millimetres of mercury, corrected to 12 percent carbon dioxide for processes involving combustion, from any point source of the Development;
 - ii) exhibits a visible plume with an opacity of greater than 5 percent at any point beyond the property line of the Development; or
 - iii) results in the deposition of visible particulate residue at any time beyond the property line of the Development; or
 - b) opacity from any point source of the Development equals or exceeds:
 - i) 20 percent as the average of any 24 consecutive opacity observations taken at 15 second intervals;
 - ii) 20 percent for more than 16 individual opacity observations within any 1 hour period; or
 - iii) 40 percent for any individual opacity observation
- 43. The Licencee shall not cause or permit an odour nuisance to be created as a result of the construction, operation, or alteration of the Development, and shall take such steps as the Director may require to eliminate or mitigate an odour nuisance.

Respecting Air Pollution Control Equipment

- 44. The Licencee shall direct all air streams from the processing building that contain a pollutant(s) of concern to the Director to a pollution control device which has been designed for and demonstrated to be capable of reducing, altering, eliminating or otherwise treating the pollutant(s).
- 45. The Licencee shall prepare, within 90 days of the issuance of this Licence, and maintain the following manuals which shall be kept at the Development and available for review upon request by an Environment Officer:
 - a) a standard operating procedural manual and a maintenance schedule for each air emission pollution control device based on the manufacturer's specifications and recommendations;
 - b) an updated standard operating procedural manual and a maintenance procedure for each air emission pollution control device within 120 days of the addition, elimination or change regarding any air emission control device; and
 - c) a copy of the manufacturer's operational and maintenance manual.
- 46. The Licencee shall not operate any process directing an emission to an air pollution control device at the Development unless:
 - a) the operating and maintenance measures and status of the device are in full compliance with the procedures and timetables as per Clause 45;
 - b) all emissions from the process are directed to the fully operational air pollution control device;
 - c) all discharges of treated emissions from the air pollution control devices are immediately directed to a stack;
 - d) the emissions do not contain concentrations of pollutants which:
 - i) are in violation of any other applicable legal instrument including an Act, Regulation or by-law; or
 - ii) otherwise create a significant negative environmental or health impact in the affected area.

Urbanmine Inc. Licence No. 3199 R Page 10 of 15

- 47. The Licencee shall maintain a log of the most recent 24 month period to record any downtime of an air pollution control device due to either the breakdown or maintenance of that air pollution control device. The log shall be kept at the Development and shall be available upon request for inspection by an Environment Officer. The log shall record, at minimum, the following information:
 - a) identification of the air pollution control device and the process(es) it serves;
 - b) time/date of log entry;
 - c) nature of event;
 - d) time and duration of event;
 - e) action taken;
 - f) the accumulated downtime of this air pollution control device for the events for each calendar year; and;
 - g) approval by the Environmental Coordinator.
- 48. The Licencee shall handle, store and dispose of all pollutants collected by the air pollution control equipment in a manner suitable to their characterization as type of waste or dangerous good.

Respecting Air Emission Monitoring

- 49. The Licencee shall, within 90 days of commissioning each of the ferrous and nonferrous processing lines, provide stack(s) including all necessary sampling facilities for the sampling of air emissions at the Development. The stacks shall be provided:
 - a) at a location(s) satisfactory to the Director; and
 - b) to the specifications and in accordance with the most recent version of Manitoba Conservation and Climate Guideline, "Guideline for Stack Sampling Facilities", unless otherwise approved by the Director.
- 50. The Licencee shall, within 90 days of commissioning each of the ferrous and nonferrous processing lines, submit a detailed plan which is acceptable to and approved by the Director, for the sampling and analysis of potential air pollutants, released as stationary point and fugitive emissions, including any compounds determined by the Director. The plan shall identify the rationale for the sampling, the ways and means by which the sampling program will be implemented including any special measures or methods which would be necessitated by influencing factors such as unfavourable weather conditions, the need for large or additional sample volumes, the need for multiple sampling runs, the methods used for the sampling and the analysis for each compound, the detection level to be attained, a comprehensive QA/QC program, and other items as may be identified by the Director.
- 51. The Licencee shall perform all stack sampling in accordance with the most recent version of Manitoba Conservation and Climate Report No. 96-07, "Interim Stack Sampling Performance Protocol", unless otherwise approved by the Director.
- 52. The Licencee shall arrange the scheduling of the sampling program submitted pursuant to Clause 50 of this Licence such that a representative of Manitoba Conservation and Climate is available to monitor and audit the implementation of the sampling program.
- 53. The Licencee shall complete the sampling of emissions according to the approved plan submitted pursuant to Clause 50 of this Licence, within a timeframe to be determined by the Director.

Urbanmine Inc. Licence No. 3199 R Page 11 of 15

- 54. The Licencee shall submit a report, for the approval of the Director, on the completed sampling and analysis plan approved pursuant to Clause 50 of this Licence, within 60 days of the receipt of the analytical results of that sampling plan. The report shall contain at minimum the following:
 - a) the raw data collected;
 - b) a discussion of the sampling and analytical portions of the program including any anomalies of sampling and analysis; and
 - c) a discussion of the significance of the data gathered with specific attention to:
 - i) the significance for potential acute and chronic impacts to health or environment from exposure to concentrations of the compounds detected;
 - ii) the need for risk assessment of the impact of emissions;
 - iii) the need for the establishment of ambient air monitoring stations;
 - iv) the need for dispersion modeling of emissions;
 - v) results and conclusions of the QA/QC program; and
 - vi) other issues as may be determined by the Director.
- 55. The Licencee shall, upon the written request of and in a timeframe stipulated by the Director, comply with any air emission or ambient air quality criteria specified by the Director for any pollutant of concern to the Director which has been identified pursuant to Clause 4, 42, 44, or 54 of this Licence.

Respecting Fugitive Dust Emission

- 56. The Licencee shall take action as needed to control or prevent the entrainment of particulate matter into the air at the facility resulting from the operation of vehicles or the transportation, storage or handling of scrap metals or other material.
- 57. The Licencee shall not utilize used oil as a dust suppressant within the yard of the Development.
- 58. The Licencee, upon written request from the Director, shall:
 - a) submit a fugitive dust emission sampling and analysis plan for the Director's approval; and
 - b) implement the plan approved pursuant to Clause 58 a) of this Licence within a timeframe to be determined by the Director.
- 59. The Licencee shall submit, for the Director's approval, a report of the completed sampling and analysis plan approved pursuant to Clause 58 a) of this Licence, within 60 days of the receipt of the analytical results of that sampling plan.

Respecting Material Handling, Fire and Explosion

- 60. The Licencee shall prior to processing scrap metal assemblies and components:
 - a) carry out a thorough and continuous program of inspection of the said scrap metal to discover potentially explosive components;
 - b) remove or render inexplosive tanks, pressure vessels or other potentially explosive components;
 - c) reject man-made detectable radioactive isotopic materials, dangerous goods, and hazardous waste materials that are not in accordance with the Licencee's acceptance protocols, and return rejected materials still owned by scrap suppliers to the scrap suppliers;
 - d) remove man-made detectable radioactive isotopic materials, dangerous goods, and hazardous waste materials erroneously accepted from scrap suppliers and dispose of said materials in accordance with applicable legislation; and

- e) maintain and keep available for inspection by an Environment Officer, a log of:
 - i) all inspections carried out pursuant to Clause 61 a) that required action by the Licencee pursuant to Clauses 60(b), (c), or (d);
 - ii) all and any explosions that take place on the site of the said operation giving time, intensity and cause; and
 - iii) all potentially explosive components removed prior to processing together with a description of the assemblies removed and where practical, identification of the source or supplier of the said assemblies.
- 61. The Licencee shall not accept vehicles for the purpose of crushing.
- 62. The Licencee shall report all fire incidents and explosions to the Director within 24 hours of their occurrence, on a form approved by the Director.
- 63. The Licencee shall submit and maintain an updated fire safety plan with the Winnipeg Fire Paramedic Service.

Respecting Chemical Storage and Spill Containment

- 64. The Licencee shall provide containment for all vessels containing chemicals in each area of the Development where the chemicals are stored, loaded, transferred, used or otherwise handled, in compliance with the current Manitoba Fire Code, or any future amendment thereof, such that any product leakage or spillage and any contaminated liquid generated is contained within the Development and contamination of groundwater and surface water is prevented.
- 65. The Licencee shall, in a manner approved by the Director, remove and dispose of all spilled dangerous goods.
- 66. The Licencee shall in the event of a spill, dispose of the water used to clean up the spill in accordance with applicable regulation.

Respecting Dangerous Goods and Hazardous Wastes

- 67. The Licencee shall store, handle and dispose of all dangerous goods and hazardous wastes used or generated at the Development in accordance with the provisions of The Manitoba Dangerous Goods Handling and Transportation Act (C.C.S.M. c. D12) and any future amendment thereof.
- 68. The Licencee shall comply with all the applicable requirements of:
 - a) the Storage and Handling of Petroleum Products and Allied Products Regulation, or any future amendment thereof;
 - b) The Dangerous Goods Handling and Transportation Act, and regulations issued thereunder and any future amendment thereof, respecting the handling, transport, storage and disposal of any dangerous goods brought onto or generated at the Development; and
 - c) the Office of the Fire Commissioner Province of Manitoba.

Urbanmine Inc. Licence No. 3199 R Page 13 of 15

Respecting Wastewater

- 69. The Licencee shall not discharge wastewater beyond the boundaries of the Development except any discharge which is directed to the City of Winnipeg wastewater collection system in accordance with the requirements of the City of Winnipeg.
- 70. The Licencee shall prevent the seepage or surface flow of any liquid waste emanating from the operation from entering any land or body of water off the Development.
- 71. The Licencee shall direct all surface runoff towards the City of Winnipeg storm water collection system in accordance with the requirements of the City of Winnipeg.

Respecting Solid Waste

- 72. The Licencee shall dispose of all solid waste generated at the Development, which is not recycled, only to a waste management facility operating under the authority of a permit issued pursuant to the Waste Management Facilities Regulation or any future amendment thereof, or a Licence issued pursuant to The Environment Act.
- 73. The Licencee shall direct all recyclable materials generated at the Development to an approved recycling facility.

Respecting Emergencies

- 74. The Licencee shall, in the case of physical or mechanical equipment breakdown or process upset where such breakdown or process upset results or may result in the release of a pollutant in an amount or concentration, or at a level or rate of release, that causes or may cause a significant adverse effect, immediately report the event by calling the 24-hour environmental accident reporting line at 204-944-4888 (toll-free 1-855-944-4888). The report shall indicate the nature of the event, the time and estimated duration of the event and the reason for the event.
- 75. The Licencee shall, following the reporting of an event pursuant to Clause 74
 - a) identify the repairs required to the mechanical equipment;
 - b) undertake all repairs to minimize unauthorized discharges of a pollutant;
 - c) complete the repairs in accordance with any written instructions of the Director; and
 - d) submit a report to the Director about the causes of breakdown and measures taken, within one week of the repairs being done.
- 76. The Licencee shall prepare, within 90 days of the date of issuance of this Licence, and maintain an emergency response contingency plan in accordance with the Canadian Centre for Occupational Health and Safety "Emergency Response Planning Guide" or other emergency planning guidelines acceptable to the Director.

Respecting Financial Assurance

- 77. The Licencee shall prepare, within 180 days of the date of this licence, a remediation and closure plan assessment, satisfactory to the Director, that includes, but is not limited to, the following:
 - a) Estimated cost to assess the impacts of the development to soil and groundwater
 - b) Estimated cost to remediate impacts of the development identified in the assessment referred to in clause 77 a).

Urbanmine Inc. Licence No. 3199 R Page 14 of 15

- c) Estimated cost to decommission the development;
- 78. The Licencee shall maintain and post with Manitoba Conservation and Climate, in the amount determined in Clause 77 of this Licence
 - a) A permit bond issued by a surety company licenced to do business in the Province of Manitoba
 - b) An irrevocable letter of credit, or
 - c) Another acceptable security satisfactory to the Director.

This permit bond, irrevocable letter of credit, or other security and renewals thereof shall remain in place for the duration of the operation and decommissioning of the facility. The Director may order forfeiture of the permit bond, irrevocable letter of credit, or other security, either in whole or in part, by giving written notice to that effect to the Licencee, upon the Director being satisfied that the Licencee is in breach of any specification, limit, term or condition of this Licence, or for reimbursement of any costs or expenses incurred by the Province of Manitoba in rectifying environmental damage caused or contributed to by the operation of the facility.

- 79. The Licencee shall, every 5 years or more frequently at the Licencee's preference or the request of the Director, carry out a review of the assessment completed pursuant to Clause 77 of this licence and accordingly update the amount of the permit bond, irrevocable letter or credit or other security required by Clause 78 of this licence.
- 80. The Licencee shall maintain a valid Environmental Impairment Liability insurance providing coverage subject to a minimum limit of \$1,000,000 Cdn per occurrence or claim, including coverage for gradual, and sudden and accidental pollution. Coverage to include on-site and offsite clean-up costs, and be placed with insurers satisfactory to the Province of Manitoba. The Province of Manitoba is to be added as an Additional Insured on the policy. The policy shall contain a clause stating that the Insurer will give Manitoba 60 days prior written notice in case of a reduction in coverage or policy cancellation.

Reporting

- 81. The Licencee shall submit all information required to be provided to the Director or Environment Officer under this Licence, in written and electronic format, in such form (including number of copies), and of such content as may be required by the Director or Environment Officer, and each submission shall be clearly labelled with the Licence Number and Client File Number associated with this Licence.
- 82. The Licencee shall manage all complaints in accordance with the plan approved pursuant to Clause 6 and 7 and submit an annual report summarizing the complaints received and the action taken in response to each complaint from October 1 of the previous year to September 30 of the current year.
- 83. The Licencee shall submit to the Director annual inspection report of the fire hydrants located on the property of the Development.
- 84. The Licencee shall submit to the Director an annual report of the noise management program, summarizing the actions taken to comply with Clause 34 a), b), c) and d) from October 1 of the previous year to September 30 of the current year.

Urbanmine Inc. Licence No. 3199 R Page 15 of 15

85. The Licencee shall submit the annual reports indicated under Clauses 83, 84 and 85 of this licence by November 1 of each year to the Director.

Closure and Post-Closure

- 86. Within one year prior to imminent closure of the Development, the Licencee shall submit, for the approval of the Director, a formal detailed Closure and Post-Closure Plan for the Development.
- 87. The Licencee shall implement and maintain the approved Closure and Post-Closure Plan.

REVIEW AND REVOCATION

- A. This Licence replaces Licences No. 3199 and 237 HW RR which are hereby rescinded.
- B. If in the opinion of the Director, the Licencee has exceeded or is exceeding or has or is failing to meet the specifications, limits, terms or conditions set out in this Licence, the Director may, temporarily or permanently, revoke this Licence.
- C. If, in the opinion of the Director, new evidence warrants a change in the specifications, limits, terms or conditions set out in this Licence, the Director may require the filing of a new proposal pursuant to The Environment Act.

Original Signed By

Shannon Kohler, Director The Environment Act

Consignor Registration No. MB G 11875 Consignee Registration No. MB R 3006

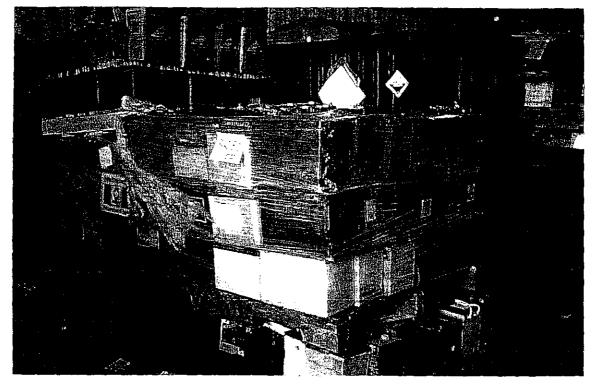
APPENDIX 'A' TO ENVIRONMENT ACT LICENCE NO. 3199 R Urbanmine Inc. Scrap Metal Processing Facility

The batteries and cells referred to in the Definitions Section as "battery" in Licence No. 3199 R are

- Lead Acid Automotive Palletized
- Lead Acid Heavy Duty Equipment
- Lead Acid "Glass" Station
- Lead Acid Steel Clad
- Lead Absolyte Battery
- Lead "Gates" Sealed Cell
- Lead Sealed Cells
- Lead Acid "Submarine" or "07" Tank Cells
- Lead Acid Monoblock Cell
- Alkaline Sealed Cell (flashlight etc.)
- Zinc Chloride, Zinc Carbon Lantern Battery
- Nickel Cadmium Sealed Cell Rechargeable
- Nickel Cadmium Vented Cell
- Air Depolarized Zinc (non-toxic)
- Air Depolarized Zinc(toxic with Mercury)
- Mercury Oxide Sealed Cells
- Lithium Cells and Batteries

The acceptable storage instructions for the batteries and cells referred to in the Definitions Section as "battery" in Licence No. 3199 R are to be found on the following pages:

LEAD ACID AUTOMOTIVE PALLETIZED



NO MANIFEST REQUIRED IN ONTARIO - SHIPPED ON BILL OF LADING

PROPER SHIPPING NAME DESCRIPTION:

CANADIAN: WASTE BATTERIES, WET, FILLED WITH ACID, ELECTRIC STORAGE, 8, UN2794, 112C, PG III, ERG#154

UNITED STATES: WASTE BATTERIES, WET, FILLED WITH ACID, ELECTRIC STORAGE, 8, UN2794, D002/D008, PG III, ERG#154

D.O.T.

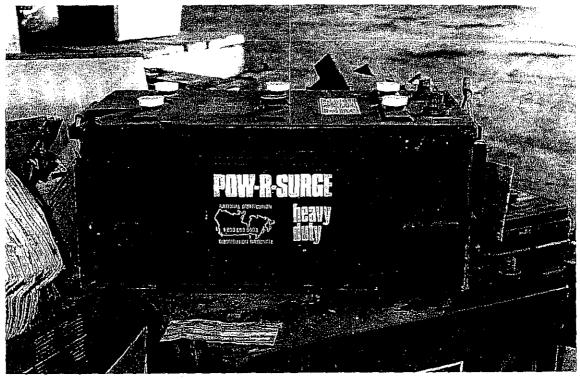
DESCRIPTION: BATTERIES, WET, FILLED WITH ACID, ELECTRIC STORAGE, 8, UN2794, PG III, ERG#154

UNIVERSAL WASTE RULE 273: STATES THAT HAVE ADOPTED RULE 273 CAN SHIP USING A BILL OF LADING, REPLACING THE HAZARDOUS WASTE MANIFEST. THE SHIPPING DOCUMENT MUST CONTAIN THE PROPER D.O.T. SHIPPING NAME. SEE APPENDIX A FOR A SUMMARY OF UWR.

P.I.N.: UN2794	CANADIAN WASTE CODE: 112C	CLASSIFICATON: 8
APPROX. WEIGHT (LBS.): 3000	UNITED STATES WASTE NO: D002/D008	PACKING GROUP: III

- CORROSIVE PLACARDS REQUIRED.
- TWO CORROSIVE LABELS ARE REQUIRED. ONE EACH ON OPPOSITE ENDS OF THE PACKAGE.
- PALLETIZE FOR SHIPMENT USING PLASTIC "SHRINK WRAP" TO SECURE CELLS ON PALLET.
- USE CARDBOARD BETWEEN ROWS OF CELLS TO ACT AS BOTH SHOCK ABSORBER AND TO ABSORB LIQUID WHICH MAY LEAK FROM CELLS.
- DO NOT STACK CELLS MORE THAN THREE ROWS HIGH.

LEAD ACID - HEAVY DUTY EQUIPMENT



NO MANIFEST REQUIRED IN ONTARIO - SHIPPED ON BILL OF LADING

PROPER SHIPPING NAME DESCRIPTION:

CANADIAN: WASTE BATTERIES, WET, FILLED WITH ACID, ELECTRIC STORAGE, 8, UN2794, 112C, PG III, ERG#154

UNITED STATES: WASTE BATTERIES, WET, FILLED WITH ACID, ELECTRIC STORAGE, 8, UN2794, D002/D008, PG III, ERG#154

D.O.T.

DESCRIPTION: BATTERIES, WET, FILLED WITH ACID, ELECTRIC STORAGE, 8, UN2794, PG III, ERG#154

UNIVERSAL WASTE RULE 273: STATES THAT HAVE ADOPTED RULE 273 CAN SHIP USING A BILL OF LADING, REPLACING THE HAZARDOUS WASTE MANIFEST. THE SHIPPING DOCUMENT MUST CONTAIN THE PROPER D.O.T. SHIPPING NAME. SEE APPENDIX A FOR A SUMMARY OF UWR.

P.I.N.: UN2794	CANADIAN WASTE CODE: 112C	CLASSIFICATON: 8
APPROX. WEIGHT (LBS.): 60-115	UNITED STATES WASTE NO: D002/D008	PACKING GROUP: III

- CORROSIVE PLACARDS REQUIRED.
- TWO CORROSIVE LABELS ARE REQUIRED. ONE EACH ON OPPOSITE ENDS OF THE PACKAGE.
- PALLETIZE FOR SHIPMENT USING PLASTIC "SHRINK WRAP" TO SECURE CELLS ON PALLET.
- USE CARDBOARD BETWEEN ROWS OF CELLS TO ACT AS BOTH SHOCK ABSORBER AND TO ABSORB
 LIQUID WHICH MAY LEAK FROM CELLS.
- DO NOT STACK CELLS MORE THAN THREE ROWS HIGH.

LEAD ACID "GLASS" STATION



NO MANIFEST REQUIRED IN ONTARIO - SHIPPED ON BILL OF LADING

PROPER SHIPPING NAME DESCRIPTION:

CANADIAN: WASTE BATTERIES, WET, FILLED WITH ACID, ELECTRIC STORAGE, 8, UN2794, 112C, PG III, ERG#154

UNITED STATES: WASTE BATTERIES, WET, FILLED WITH ACID, ELECTRIC STORAGE, 8, UN2794, D002/D008, PG III, ERG#154

D.O.T.

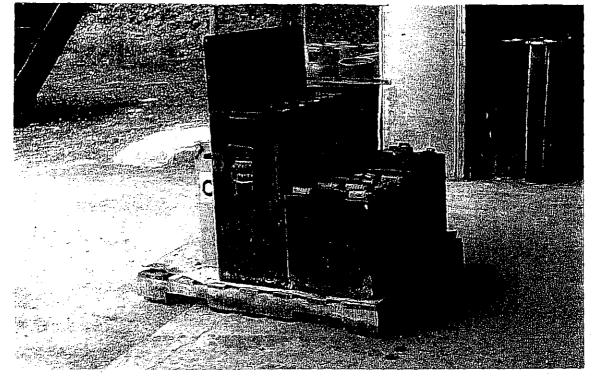
DESCRIPTION: BATTERIES, WET, FILLED WITH ACID, ELECTRIC STORAGE, 8, UN2794, PG III, ERG#154

UNIVERSAL WASTE RULE 273: STATES THAT HAVE ADOPTED RULE 273 CAN SHIP USING A BILL OF LADING, REPLACING THE HAZARDOUS WASTE MANIFEST. THE SHIPPING DOCUMENT MUST CONTAIN THE PROPER D.O.T. SHIPPING NAME. SEE APPENDIX A FOR A SUMMARY OF UWR.

P.I.N.:UN2794CANADIAN WASTE CODE:112CCLASSIFICATON:8APPROX.WEIGHT (LBS.):25-350UNITED STATES WASTE NO:D002/D008PACKING GROUP:III

- CORROSIVE PLACARDS REQUIRED.
- TWO CORROSIVE LABELS ARE REQUIRED. ONE EACH ON OPPOSITE ENDS OF THE PACKAGE.
- PALLETIZE FOR SHIPMENT USING PLASTIC "SHRINK WRAP" TO SECURE CELLS ON PALLET.
- USE CARDBOARD BETWEEN SKIDS AND CELLS TO ACT AS BOTH SHOCK ABSORBER AND TO AB-SORB LIQUID WHICH MAY LEAK FROM CELLS.
- DO NOT STACK THESE CELLS.

LEAD ACID - STEEL CLAD



NO MANIFEST REQUIRED IN ONTARIO - SHIPPED ON BILL OF LADING

PROPER SHIPPING NAME DESCRIPTION:

CANADIAN: WASTE BATTERIES, WET, FILLED WITH ACID, ELECTRIC STORAGE, 8, UN2794, 112C, PG III, ERG#154

UNITED STATES: WASTE BATTERIES, WET, FILLED WITH ACID, ELECTRIC STORAGE, 8, UN2794, D002/D008, PG III, ERG#154

D.O.T.

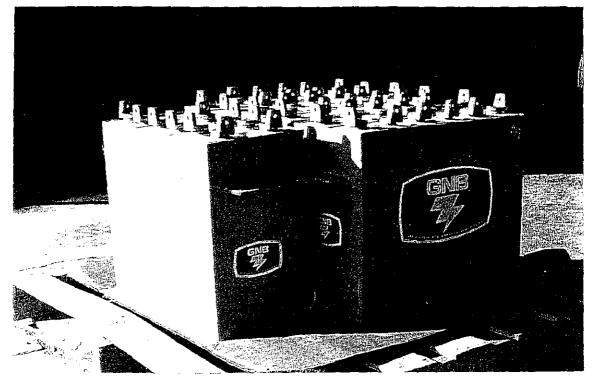
DESCRIPTION: BATTERIES, WET, FILLED WITH ACID, ELECTRIC STORAGE, 8, UN2794, PG III, ERG#154

UNIVERSAL WASTE RULE 273: STATES THAT HAVE ADOPTED RULE 273 CAN SHIP USING A BILL OF LADING, REPLACING THE HAZARDOUS WASTE MANIFEST. THE SHIPPING DOCUMENT MUST CONTAIN THE PROPER D.O.T. SHIPPING NAME. SEE APPENDIX A FOR A SUMMARY OF UWR.

P.I.N.: UN2794 CANADIAN WASTE CODE: 112C CLASSIFICATON: 8 APPROX. WEIGHT (LBS.): 250-5000 UNITED STATES WASTE NO: D002/D008 PACKING GROUP: III

- CORROSIVE PLACARDS REQUIRED.
- TWO CORROSIVE LABELS ARE REQUIRED. ONE EACH ON OPPOSITE ENDS OF THE PACKAGE.
- PALLETIZE FOR SHIPMENT USING PLASTIC "SHRINK WRAP" TO SECURE CELLS ON PALLET.
- USE CARDBOARD BETWEEN ROWS OF CELLS TO ACT AS BOTH SHOCK ABSORBER AND TO ABSORB LIQUID WHICH MAY LEAK FROM CELLS.
- DO NOT STACK THESE CELLS .

LEAD ABSOLYTE BATTERY



NO MANIFEST REQUIRED IN ONTARIO - SHIPPED ON BILL OF LADING

PROPER SHIPPING NAME DESCRIPTION:

CANADIAN: WASTE BATTERIES, WET, NON-SPILLABLE, ELECTRIC STORAGE, 8, UN2800, 112C, PG III, ERG#154

UNITED STATES: WASTE BATTERIES, WET, NON-SPILLABLE, ELECTRIC STORAGE, 8, UN2800, D002/D008, PG III, ERG#154

D.O.T.

DESCRIPTION: BATTERIES, WET, NON-SPILLABLE, ELECTRIC STORAGE, 8, UN2800, PG III, ERG#154

UNIVERSAL WASTE RULE 273: STATES THAT HAVE ADOPTED RULE 273 CAN SHIP USING A BILL OF LADING, REPLACING THE HAZARDOUS WASTE MANIFEST. THE SHIPPING DOCUMENT MUST CONTAIN THE PROPER D.O.T. SHIPPING NAME. SEE APPENDIX A FOR A SUMMARY OF UWR.

P.I.N.: UN2800	CANADIAN WASTE CODE: 112C	CLASSIFICATON: 8
APPROX. WEIGHT (LBS.): 500	UNITED STATES WASTE NO: D002/D008	PACKING GROUP:

- CORROSIVE PLACARDS REQUIRED.
- TWO CORROSIVE LABELS ARE REQUIRED. ONE EACH ON OPPOSITE ENDS OF THE PACKAGE.
- PALLETIZE FOR SHIPMENT USING PLASTIC "SHRINK WRAP" TO SECURE CELLS ON PALLET.
- THESE CELLS CONTAIN CADMIUM (AS MUST AS 5%), AS WELL AS LEAD.
- DO NOT STACK THESE CELLS.

LEAD "GATES" SEALED CELL



NO MANIFEST REQUIRED IN ONTARIO - SHIPPED ON BILL OF LADING

PROPER SHIPPING NAME DESCRIPTION:

CANADIAN: WASTE BATTERIES, WET, NON-SPILLABLE, ELECTRIC STORAGE, 8, UN2800, 112C, PG III, ERG#154

UNITED STATES: WASTE BATTERIES, WET, NON-SPILLABLE, ELECTRIC STORAGE, 8, UN2800, D002/D008, PG III, ERG#154

D.O.T.

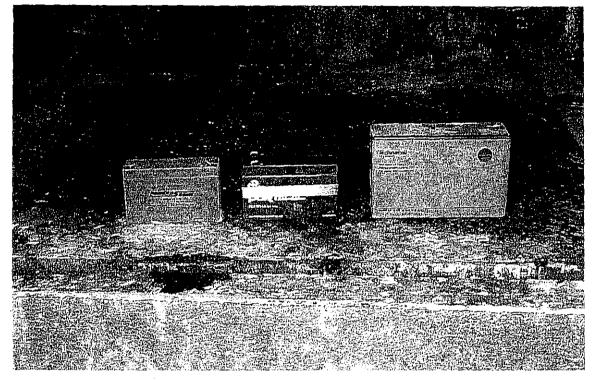
DESCRIPTION: BATTERIES, WET, NON-SPILLABLE, ELECTRIC STORAGE, 8, UN2800, PG III, ERG#154

UNIVERSAL WASTE RULE 273: STATES THAT HAVE ADOPTED RULE 273 CAN SHIP USING A BILL OF LADING, REPLACING THE HAZARDOUS WASTE MANIFEST. THE SHIPPING DOCUMENT MUST CONTAIN THE PROPER D.O.T. SHIPPING NAME. SEE APPENDIX A FOR A SUMMARY OF UWR.

P.I.N.: UN2800	CANADIAN WASTE CODE: 112C	CLASSIFICATON: 8
APPROX. WEIGHT (LBS.): 23	UNITED STATES WASTE NO: D002/D008	PACKING GROUP: III

- CORROSIVE PLACARDS REQUIRED.
- TWO CORROSIVE LABELS ARE REQUIRED. ONE EACH ON OPPOSITE ENDS OF THE PACKAGE.
- PALLETIZE FOR SHIPMENT USING PLASTIC "SHRINK WRAP" TO SECURE CELLS ON PALLET.
- IDEALLY, CELLS SHOULD BE PLACED IN THE ORIGINAL CARTON, THEN STACKED NO MORE THAN 5 ROWS HIGH.

LEAD SEALED CELLS



NO MANIFEST REQUIRED IN ONTARIO - SHIPPED ON BILL OF LADING

PROPER SHIPPING NAME DESCRIPTION:

CANADIAN: WASTE BATTERIES, WET, NON-SPILLABLE, ELECTRIC STORAGE, 8, UN2800, 112C, PG III, ERG#154

UNITED STATES: WASTE BATTERIES, WET, NON-SPILLABLE, ELECTRIC STORAGE, 8, UN2800, D002/D008, PG III, ERG#154

D.O.T.

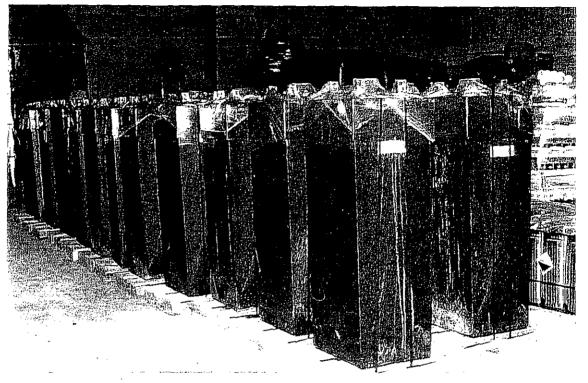
DESCRIPTION: BATTERIES, WET, NON-SPILLABLE, ELECTRIC STORAGE, 8, UN2800, PG III, ERG#154

UNIVERSAL WASTE RULE 273: STATES THAT HAVE ADOPTED RULE 273 CAN SHIP USING A BILL OF LADING, REPLACING THE HAZARDOUS WASTE MANIFEST. THE SHIPPING DOCUMENT MUST CONTAIN THE PROPER D.O.T. SHIPPING NAME. SEE APPENDIX A FOR A SUMMARY OF UWR.

P.I.N.:UN2800CANADIAN WASTE CODE:112CCLASSIFICATON:8APPROX. WEIGHT (LBS.):1-15UNITED STATES WASTE NO:D002/D008PACKING GROUP:III

- CORROSIVE PLACARDS REQUIRED.
- TWO CORROSIVE LABELS ARE REQUIRED. ONE EACH ON OPPOSITE ENDS OF THE PACKAGE.
- PALLETIZE FOR SHIPMENT USING PLASTIC "SHRINK WRAP" TO SECURE CELLS ON PALLET.
- USE CARDBOARD BETWEEN ROWS OF CELLS TO ACT AS BOTH SHOCK ABSORBER AND TO ABSORB
 LIQUID WHICH MAY LEAK FROM CELLS.
- CELLS MAY ALSO BE PLACED IN DRUMS, CARDBOARD BOXES OR WOODEN CRATES AND MUST BE SECURED TO A PALLET USING PLASTIC "SHRINK WRAP".

LEAD ACID "SUBMARINE" OR "07' TANK CELLS



NO MANIFEST REQUIRED IN ONTAIRO - SHIPPED ON BILL OF LADING

PROPER SHIPPING NAME DESCRIPTION:

CANADIAN: WASTE BATTERIES, WET, FILLED WITH ACID, ELECTRIC STORAGE, 8, UN2794, 112C, PG III, ERG#154

UNITED STATES: WASTE BATTERIES, WET, FILLED WITH ACID, ELECTRIC STORAGE, 8, UN2794, D002/D008, PG III, ERG#154

D.O.T.

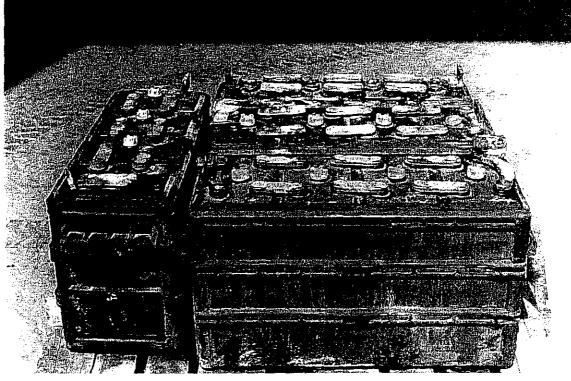
DESCRIPTION: BATTERIES, WET, FILLED WITH ACID, ELECTRIC STORAGE, 8, UN2794, PG III, ERG#154

UNIVERSAL WASTE RULE 273: STATES THAT HAVE ADOPTED RULE 273 CAN SHIP USING A BILL OF LADING, REPLACING THE HAZARDOUS WASTE MANIFEST. THE SHIPPING DOCUMENT MUST CONTAIN THE PROPER D.O.T. SHIPPING NAME. SEE APPENDIX A FOR A SUMMARY OF UWR.

P.I.N.: UN2794	CANADIAN WASTE CODE: 112C	CLASSIFICATON: 8
APPROX. WEIGHT (LBS.): 1500	UNITED STATES WASTE NO: D002/D008	PACKING GROUP:

- CORROSIVE PLACARDS REQUIRED.
- TWO CORROSIVE LABELS ARE REQUIRED. ONE EACH ON OPPOSITE ENDS OF THE PACKAGE.
- MUST SECURE WELL TO PALLET (TOP HEAVY, NARROW BOTTOM).
- WELL ADVISED TO USE BLOCKING TO PREVENT ANY MOVEMENT DURING TRANSPORT. METAL OR PLASTIC BANDING IS MORE EFFECTIVE THAN "SHRINK WRAP" IN SECURING CELL TO PALLET.
- USE ONE PALLET PER CELL. CELLS ARE TOP HEAVY.
- EXTREME CARE MUST BE TAKEN WHEN LOADING OR UNLOADING.

LEAD ACID MONOBLOCK CELL



NO MANIFEST REQUIRED IN ONTARIO - SHIPPED ON BILL OF LADING

PROPER SHIPPING NAME DESCRIPTION:

CANADIAN: WASTE BATTERIES, WET, FILLED WITH ACID, ELECTRIC STORAGE, 8, UN2794, 112C, PG III, ERG#154

UNITED STATES: WASTE BATTERIES, WET, FILLED WITH ACID, ELECTRIC STORAGE, 8, UN2794, D002/D008, PG III, ERG#154

D.O.T.

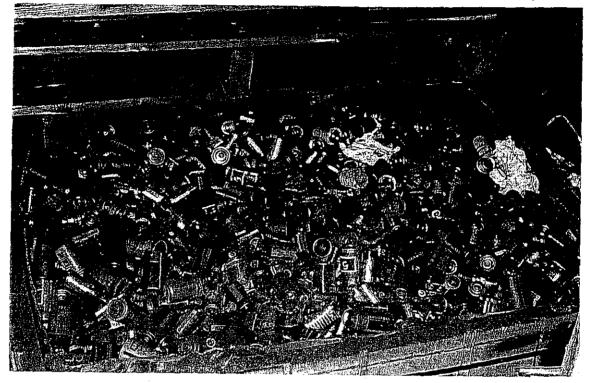
DESCRIPTION: BATTERIES, WET, FILLED WITH ACID, ELECTRIC STORAGE, 8, UN2794, PG III, ERG#154

UNIVERSAL WASTE RULE 273: STATES THAT HAVE ADOPTED RULE 273 CAN SHIP USING A BILL OF LADING, REPLACING THE HAZARDOUS WASTE MANIFEST. THE SHIPPING DOCUMENT MUST CONTAIN THE PROPER D.O.T. SHIPPING NAME, SEE APPENDIX A FOR A SUMMARY OF UWR.

P.I.N.: UN2794	CANADIAN WASTE CODE: 112C	CLASSIFICATON: 8
APPROX, WEIGHT (LBS.): 400	UNITED STATES WASTE NO: D002/D008	PACKING GROUP: III

- CORROSIVE PLACARDS REQUIRED.
- TWO CORROSIVE LABELS ARE REQUIRED, ONE EACH ON OPPOSITE ENDS OF THE PACKAGE.
- PALLETIZE FOR SHIPMENT USING PLASTIC "SHRINK WRAP" TO SECURE CELLS ON PALLET.
- USE CARDBOARD BETWEEN ROWS OF CELLS TO ACT AS BOTH SHOCK ABSORBER AND TO ABSORB LIQUID WHICH MAY LEAK FROM CELLS.
- DO NOT STACK THESE CELLS.

ALKALINE SEALED CELL (FLASHLIGHT, ETC.)



NO MANIFEST REQUIRED IN ONTARIO - SHIPPED ON BILL OF LADING

PROPER SHIPPING NAME DESCRIPTION:

CANADIAN: NON-HAZARDOUS WASTE BATTERIES (ALKALINE SEALED CELL)

UNITED STATES: NON-HAZARDOUS WASTE BATTERIES (ALKALINE SEALED CELL)

SHIPPED ON A BILL OF LADING.

APPROXIMATE WEIGHT (LBS.): < 1

- DRUMS, CARDBOARD BOXES AND WOODEN CRATES SECURED TO A PALLET WITH PLASTIC "SHRINK WRAP" ARE IDEAL FOR SHIPPING THIS TYPE OF BATTERY.
- DRUMS MUST NOT BE STACKED.
- DO NOT PACK, STORE OR SHIP USED BATTERIES IN TIGHTLY SEALED CONTAINERS. THE SLOW EVOLUTION OF HYDROGEN GAS FROM USED BATTERIES MAY PRODUCE CONTAINER OVER-PRESSURE OR EXPLOSIVE CONDITIONS.

ZINC CHLORIDE, ZINC CARBON LANTERN BATTERY



NO MANIFEST REQUIRED IN ONTARIO - SHIPPED ON BILL OF LADING

PROPER SHIPPING NAME DESCRIPTION:

CANADIAN: NON-HAZARDOUS WASTE BATTERIES (ZINC CHLORIDE, ZINC CARBON BATTERY)

UNITED STATES: NON-HAZARDOUS WASTE BATTERIES (ZINC CHLORIDE, ZINC CARBON BATTERY)

SHIPPED ON A BILL OF LADING.

APPROX. WEIGHT (LBS.): 3

- DRUMS, CARDBOARD BOXES AND WOODEN CRATES SECURED TO A PALLET WITH PLASTIC "SHRINK WRAP" ARE IDEAL FOR SHIPPING THIS TYPE OF BATTERY.
- DRUMS MUST NOT BE STACKED.
- DO NOT PACK, STORE OR SHIP USED BATTERIES IN TIGHTLY SEALED CONTAINERS. THE SLOW EVOLUTION OF HYDROGEN GAS FROM USED BATTERIES MAY PRODUCE CONTAINER OVER-PRESSURE OR EXPLOSIVE CONDITIONS.

NICKEL CADMIUM SEALED CELL RECHARGEABLE



MANIFEST REQUIRED IN ONTARIO - SHIPPED ON BILL OF LADING

PROPER SHIPPING NAME_DESCRIPTION:

CANADIAN: R.Q. WASTE BATTERIES, DRY, CONTAINING POTASSIUM HYDROXIDE, SOLID, ELECTRIC STORAGE, 8, UN3028, 121C, PG III, ERG#154 (NICKEL CADMIUM)

UNITED STATES: R,Q. WASTE BATTERIES, DRY, CONTAINING POTASSIUM HYDROXIDE, SOLID, ELECTRIC STORAGE, 8, UN3028, D002/D006, PG III, ERG#154 (NICKEL CADMIUM)

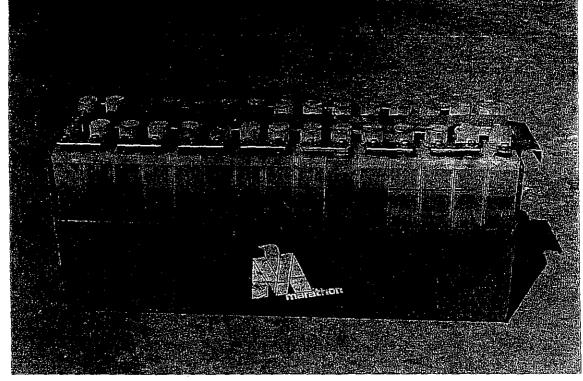
D.O.T. BATTERIES, DRY, CONTAINING POTASSIUM HYDROXIDE, SOLID , ELECTRIC STORAGE, UN3028, PG III, ERG#154

UNIVERSAL WASTE RULE 273: STATES THAT HAVE ADOPTED RULE 273 CAN SHIP USING A BILL OF LADING, REPLACING THE HAZARDOUS WASTE MANIFEST. THE SHIPPING DOCUMENT MUST CONTAIN THE PROPER D.O.T. SHIPPING NAME. SEE APPENDIX A FOR A SUMMARY OF UWR.

P.I.N.: UN3028	CANADIAN WASTE CODE: 1210	CLASSIFICATON: 8
APPROX. WEIGHT (LBS.): <1	UNITED STATES WASTE NO: D002/D006	PACKING GROUP: []]

- CORROSIVE PLACARDS REQUIRED.
- TWO CORROSIVE LABELS ARE REQUIRED. ONE EACH ON OPPOSITE ENDS OF THE PACKAGE.
- HAZARDOUS WASTE LABEL OR UNIVERSAL WASTE LABEL IS REQUIRED ON EACH PACKAGE FOR TRANSPORT IN THE U.S.A.
- DRUMS, CARDBOARD BOXES AND WOODEN CRATES SECURED TO A PALLET WITH PLASTIC "SHRINK WRAP" ARE IDEAL FOR SHIPPING THIS TYPE OF BATTERY.
- DRUMS OR CRATES MUST NOT BE STACKED.

NICKEL CADMIUM VENTED CELL



MANIFEST REQUIRED IN ONTARIO - SHIPPED ON BILL OF LADING

PROPER SHIPPING NAME DESCRIPTION:

CANADIAN: R.Q. WASTE BATTERIES, WET, FILLED WITH ALKALI, ELECTRIC STORAGE, 8, UN2795, 121C, PG III, ERG#154 (NICKEL CADMIUM)

UNITED STATES: R.Q. WASTE BATTERIES, WET, FILLED WITH ALKALI, ELECTRIC STORAGE, 8, UN2795, D002/D006, PG III, ERG#154 (NICKEL CADMIUM)

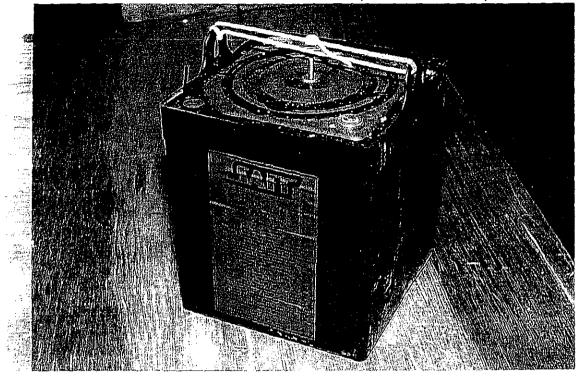
D.O.T. BATTERIES, WET, FILLED WITH ALKALI, ELECTRIC STORAGE, 8, UN2795, PG III, DESCRIPTION: ERG#154 (NICKEL CADMIUM)

UNIVERSAL WASTE RULE 273: STATES THAT HAVE ADOPTED RULE 273 CAN SHIP USING A BILL OF LADING, REPLACING THE HAZARDOUS WASTE MANIFEST. THE SHIPPING DOCUMENT MUST CONTAIN THE PROPER D.O.T. SHIPPING NAME. SEE APPENDIX A FOR A SUMMARY OF UWR.

P.I.N.:UN2795CANADIAN WASTE CODE:121CCLASSIFICATON:8APPROX.WEIGHT (LBS.):2-70UNITED STATES WASTE NO:D002/D006PACKING GROUP:III

- CORROSIVE PLACARDS REQUIRED.
- TWO CORROSIVE LABELS ARE REQUIRED. ONE EACH ON OPPOSITE ENDS OF THE PACKAGE.
- HAZARDOUS WASTE LABEL OR UNIVERSAL WASTE LABEL IS REQUIRED ON EACH PACKAGE FOR TRANSPORT IN THE U.S.A.
- PALLETIZE FOR SHIPMENT USING PLASTIC "SHRINK WRAP" TO SECURE CELLS ON PALLET. USE CARDBOARD BETWEEN ROWS OF CELLS ON PALLET TO ACT AS BOTH SHOCK ABSORBER AND TO ABSORB LIQUID WHICH MAY LEAK FROM CELLS.
- DO NOT STACK THESE CELLS MORE THAN THREE ROWS HIGH.

AIR DEPOLARIZED ZINC (NON-TOXIC)



MANIFEST REQUIRED IN ONTARIO - SHIPPED ON BILL OF LADING

PROPER SHIPPING NAME DESCRIPTION:

CANADIAN: R.Q. WASTE BATTERIES, WET, FILLED WITH ALKALI, ELECTRIC STORAGE, 8, UN2795, 121C, PG III, ERG#154 (AIR DEPOLARIZED ZINC, NON-TOXIC)

UNITED STATES: R.Q. WASTE BATTERIES, WET, FILLED WITH ALKALI, ELECTRIC STORAGE, 8, UN2795, D002, PG III, ERG#154 (AIR DEPOLARIZED ZINC, NON-TOXIC)

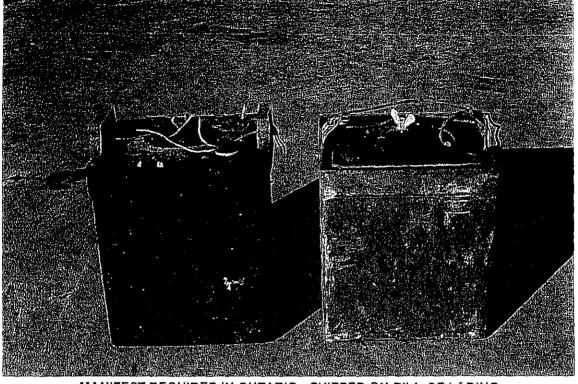
D.O.T. BATTERIES, WET, FILLED WITH ALKALI, ELECTRIC STORAGE, 8, UN2795, PG III, DESCRIPTION: ERG#154 (AIR DEPOLARIZED ZINC - NON TOXIC)

UNIVERSAL WASTE RULE 273: STATES THAT HAVE ADOPTED RULE 273 CAN SHIP USING A BILL OF LADING, REPLACING THE HAZARDOUS WASTE MANIFEST. THE SHIPPING DOCUMENT MUST CONTAIN THE PROPER D.O.T. SHIPPING NAME. SEE APPENDIX A FOR A SUMMARY OF UWR.

P.I.N.: UN2795	CANADIAN WASTE CODE: 121C	CLASSIFICATON: 8
APPROX. WEIGHT (LBS.): 35	UNITED STATES WASTE NO: D002	PACKING GROUP: III

- CORROSIVE PLACARDS REQUIRED.
- TWO CORROSIVE LABELS ARE REQUIRED. ONE EACH ON OPPOSITE ENDS OF THE PACKAGE.
- HAZARDOUS WASTE LABEL OR UNIVERSAL WASTE LABEL IS REQUIRED ON EACH PACKAGE FOR TRANSPORT IN THE U.S.A.
- PALLETIZE FOR SHIPMENT USING PLASTIC "SHRINK WRAP" TO SECURE CELLS ON PALLET.
- USE CARDBOARD BETWEEN ROWS OF CELLS TO ACT AS BOTH SHOCK ABSORBER AND TO ABSORB
 LIQUID WHICH MAY LEAK FROM CELLS.
- DO NOT STACK CELLS MORE THAN THREE ROWS HIGH, BATTERY IDENTIFICATION: GREEN TOP

AIR DEPOLARIZED ZINC (TOXIC WITH MERCURY)



MANIFEST REQUIRED IN ONTARIO - SHIPPED ON BILL OF LADING

PROPER SHIPPING NAME DESCRIPTION:

CANADIAN: R.Q. WASTE BATTERIES, WET, FILLED WITH ALKALI, ELECTRIC STORAGE, 8, UN2795, 121C, PG III, ERG#154 (AIR DEPOLARIZED ZINC - TOXIC)

UNITED STATES: R.Q. WASTE BATTERIES, WET, FILLED WITH ALKALI, ELECTRIC STORAGE, 8, UN2795, D002/D009, PG III, ERG#154 (AIR DEPOLARIZED ZINC - TOXIC)

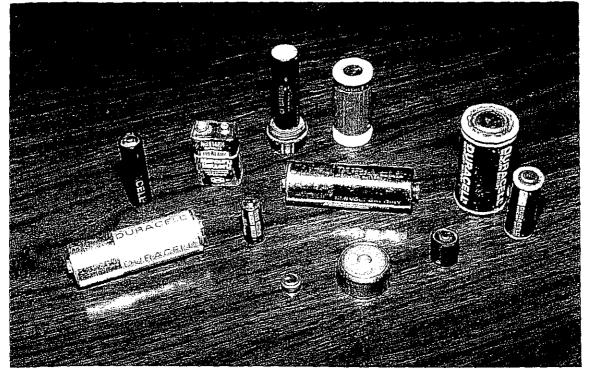
D.O.T. BATTERIES, WET, FILLED WITH ALKALI, ELECTRIC STORAGE, 8, UN2795, PG III, DESCRIPTION: ERG#154 (AIR DEPOLARIZED ZINC - TOXIC)

UNIVERSAL WASTE RULE 273: STATES THAT HAVE ADOPTED RULE 273 CAN SHIP USING A BILL OF LADING, REPLACING THE HAZARDOUS WASTE MANIFEST. THE SHIPPING DOCUMENT MUST CONTAIN THE

P.I.N.:	UN2795		CANADIAN WASTE CODE: 121C	CLASSIFICATON:	8
		35	D002/D009		111

- CORROSIVE PLACARDS REQUIRED.
- TWO CORROSIVE LABELS ARE REQUIRED. ONE EACH ON OPPOSITE ENDS OF THE PACKAGE.
- HAZARDOUS WASTE LABEL OR UNIVERSAL WASTE LABEL IS REQUIRED ON EACH PACKAGE FOR TRANSPORT IN THE U.S.A.
- PALLETIZE FOR SHIPMENT USING PLASTIC "SHRINK WRAP" TO SECURE CELLS ON PALLET.
- USE CARDBOARD BETWEEN ROWS OF CELLS TO ACT AS BOTH SHOCK ABSORBER AND TO ABSORB LIQUID WHICH MAY LEAK FROM CELLS. DO NOT STACK CELLS MORE THAN THREE ROWS HIGH.
- BATTERY IDENTIFICATION: GREY POLYPROPYLENE CASE OR BLACK EBONITE CASE WITH BLACK

MERCURY OXIDE SEALED CELLS



MANIFEST REQUIRED IN ONTARIO - SHIPPED ON BILL OF LADING

PROPER SHIPPING NAME DESCRIPTION:

CANADIAN: R.Q. WASTE MERCURY CONTAINED IN MANUFACTURED ARTICLE, 8, UN2809, 121C, PG I, ERG#172 (MERCURIC OXIDE CELLS).

UNITED STATES: R.Q. WASTE MERCURY CONTAINED IN MANUFACTURED ARTICLE, 8, UN2809, D002/D009, PG I, ERG#172, (MERCURIC OXIDE CELLS).

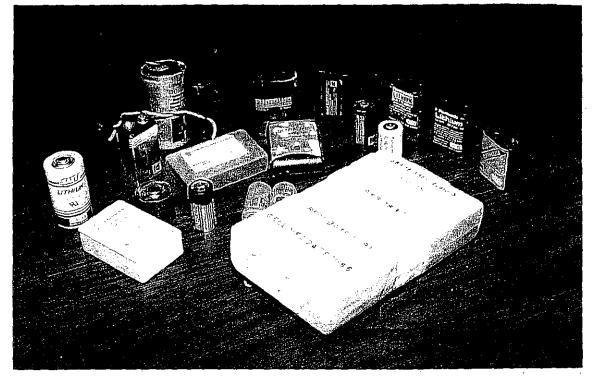
D.O.T. MERCURY CONTAINED IN MANUFACTURED ARTICLE, 8, UN2809, PG I, ERG#172 DESCRIPTION: (MERCURIC OXIDE CELLS)

UNIVERSAL WASTE RULE 273: STATES THAT HAVE ADOPTED RULE 273 CAN SHIP USING A BILL OF LADING, REPLACING THE HAZARDOUS WASTE MANIFEST. THE SHIPPING DOCUMENT MUST CONTAIN THE PROPER D.O.T. SHIPPING NAME. SEE APPENDIX A FOR A SUMMARY OF UWR.

P.I.N.: UN2809 CANADIAN WASTE CODE: 121C CLASSIFICATON: 8 APPROX. WEIGHT (LBS.): <1 UNITED STATES WASTE NO: D002/D009 PACKING GROUP: | PACKAGING & LABELLING INSTRUCTIONS:

- POISONOUS PLACARDS REQUIRED. TWO POISONOUS LABELS ARE REQUIRED. ONE EACH ON OPPOSITE ENDS OF THE PACKAGE. HAZARDOUS WASTE LABEL OR UNIVERSAL WASTE LABEL IS REQUIRED ON EACH PACKAGE FOR TRANSPORT IN THE U.S.A.
- DRUMS, CARDBOARD BOXES AND WOODEN CRATES SECURED TO A PALLET WITH PLASTIC "SHRINK WRAP" ARE IDEAL FOR SHIPPING THIS TYPE OF BATTERY. DO NOT PACKAGE, STORE OR SHIP USED BATTERIES IN TIGHTLY SEALED CONTAINERS. THE SLOW EVOLUTION OF HYDROGEN GAS FROM USED BATTERIES MAY PRODUCE OVER-PRESSURE OR EXPLOSIVE CONDITIONS. STORE IN A DRY PLACE. DO NOT RECHARGE. DO NOT STORE UNPACKAGED CELLS TOGETHER WHERE CONTACTS CAN TOUCH. THIS SITUATION COULD RESULT IN CELL SHORTING AND HEAT BUILD UP.

LITHIUM CELLS and BATTERIES



MANIFEST REQUIRED IN ONTARIO - SHIPPED ON BILL OF LADING

PROPER SHIPPING NAME DESCRIPTION:

CANADIAN: R.Q. WASTE LITHIUM BATTERIES, 9.1, UN3090, 121R, PG II, ERG#138

UNITED STATES: R.Q. WASTE LITHIUM BATTERIES, 9.1, UN3090, D003, PG II, ERG#138

D.O.T. LITHIUM BATTERIES, 9.1, UN3090, PG II, ERG#138

DESCRIPTION:

UNIVERSAL WASTE RULE 273: STATES THAT HAVE ADOPTED RULE 273 CAN SHIP USING A BILL OF LADING, REPLACING THE HAZARDOUS WASTE MANIFEST. THE SHIPPING DOCUMENT MUST CONTAIN THE PROPER D.O.T. SHIPPING NAME. SEE APPENDIX A FOR A SUMMARY OF UWR.

P.I.N.: UN3090	CANADIAN WASTE CODE: 121R	CLASSIFICATON: 9.1
APPROX, WEIGHT (LBS.): <1-20	UNITED STATES WASTE NO: D003	PACKING GROUP;

PACKAGING & LABELLING INSTRUCTIONS:

- REACTIVE PLACARDS REQUIRED.
- TWO REACTIVE LABELS ARE REQUIRED. ONE EACH ON OPPOSITE ENDS OF THE PACKAGE.
- HAZARDOUS WASTE LABEL OR UNIVERSAL WASTE LABEL IS REQUIRED ON EACH PACKAGE FOR TRANSPORT IN THE U.S.A.
- DRUMS, CARDBOARD BOXES AND WOODEN CRATES SECURED TO A PALLET WITH PLASTIC "SHRINK WRAP" ARE IDEAL FOR SHIPPING THIS TYPE OF BATTERY.
- DRUMS AND CRATES MUST NOT BE STACKED.

CONTINUED ...

LITHIUM CELLS and BATTERIES...CONTINUED

- CONTAINER PREPARATION SHOULD BE CONSIDERED BEFORE THE PACKAGING OF ANY DRUM. A
 TWO TO THREE INCH LAYER OF PACKING MATERIAL SHOULD BE PLACED IN THE BOTTOM OF THE
 DRUM.
- CELLS SHOULD NEVER BE TOUCHING THE BOTTOM, TOP OR SIDES OF A DRUM, NOR SHOULD THEY
 BE IN CONTACT WITH ONE ANOTHER, UNLESS TERMINALS ARE TAPED.
- LITHIUM CELLS OR BATTERIES ARE VERY HIGH ENERGY POWER SOURCES AND THEREFORE MUST BE HANDLED WITH CARE.
- STORE IN ORIGINAL SHIPPING CONTAINERS.
- DO NOT PLACE CELLS ON METAL SURFACES BECAUSE CELLS WILL SHORT CIRCUIT.
- CELLS AND BATTERIES SHOULD BE STORED IN A COOL, WELL VENTILATED AREA. MAXIMUM STOR-AGE TEMPERATURE SHOULD NOT EXCEED 85° CELSIUS (185°F).
- IF THEY ARE SHORT CIRCUITED OR HEAT UP, MOVE OUTDOORS OR TO A WELL VENTILATED AREA AND ALLOW TO COOL DOWN. TONGS OR OTHER DEVICES SHOULD BE USED FOR HANDLING.
- UNDER NO CIRCUMSTANCES SHOULD LITHIUM CELLS AND/OR BATTERIES BE CHARGED. CHARGING LITHIUM CELLS OR BATTERIES WILL RESULT IN EXPLOSION.
- LITHIUM CELLS AND BATTERIES HAVE PRESSURIZED CONTENTS. NEVER PLACE CELLS OR BATTER-IES IN COMPLETELY SEALED CONTAINERS. CONTAINER MUST HAVE A PRESSURE RELIEF MECHA-NISM WHICH WILL PREVENT EXCESSIVE PRESSURE BUILD-UP IN THE EVENT THAT CONTAINER IS EXPOSED TO HIGH TEMPERATURE OR CELLS AND BATTERIES ARE ABUSED.
- DO NOT OPEN, CRUSH OR PUNCTURE CELLS AND BATTERIES.

19

APPENDIX B TO ENVIRONMENT ACT LICENCE NO. 3199 R - Clause 32 Urbanmine Inc. Scrap Metal Processing Facility Community Liaison Committee

Responsibility

Urbanmine Inc. will continue to chair the established Community Liaison Committee (CLC) for the Scrap Metal Processing Facility.

Representation

The Committee is required to consist of the following representatives:

- Urbanmine Inc, Chair
- Citizen Representatives from the Lindenwood residents specially those directly adjacent to the scrap metal processing facility
- Manitoba Conservation and Climate
- Commercial and Industrial Representatives from the commercial and industrial operations located adjacent to the scrap metal processing facility.

A secretary will be assigned, by the Chair, to record discussion and decisions for each meeting when the meeting is called to order.

Terms of Reference

The Committee shall continue to meet as required by planning, construction and operational activities, but not less frequently than once a year. The Committee members may revise meeting frequency. The agenda and meeting minutes shall be posted on the public registry. The meeting may be conducted either in person or through virtual platform as agreed upon with the CLC committee members.

The Chair of the Committee shall

- 1. Notify Manitoba Conservation and Climate 14 days prior, of the time and location of the meeting.
- 2. Develop agenda for each meeting with input from the Committee and circulate the agenda at least 7 days prior to each meeting.
- 3. Document minutes from the meetings and submit the minutes to an Environment Officer within sixty (60) days following a meeting called by the Chair.

The Committee, at the request of the Director or of its own accord, shall provide advice to the Licencee and the Director respecting but not limited to the following:

- 1. The implementation of the noise mitigation plan required in Clause 36 of the Licence.
- 2. Measures to mitigate the impact of operational activities on the local environment.