ArcelorMittal Dofasco
Flat Carbon Steel

Program Management Branch - Program Oversight

Ministry of the Environment and Climate Change
HWIN Modernization
40 St. Clair Avenue West, 4th Floor
Toronto, Ontario M4V 1M2
HWINModernization@ontario.ca

July 30, 2020

ERO Registry #019-1760 Discussion Paper on modernizing hazardous waste reporting in Ontario

To Whom it May Concern,

This letter is to provide ArcelorMittal Dofasco's comments regarding the Discussion Paper on modernizing hazardous waste reporting in Ontario.

ArcelorMittal Dofasco (AMD) is an integrated steel mill in Hamilton, Ontario where coal, iron ore, steel scrap and fluxes are processed to manufacture flat rolled and tubular steel products. The facility is 739 acres and has approximately 5,300 employees.

In general, a new digital hazardous waste reporting service will be a positive change. However, it must be simple to use like the current HWIN system but with more capability to search and use the data.

The change to electronic manifesting will have a significant impact. AMD has several hundred employees who currently use waste manifests and AMD generates approximately 2,000 waste manifests per year. The transition time will have to be sufficient to allow employees to be trained and become accustomed to the new system.

Below are the discussion questions with AMD's responses.

Registration and Payment
1. How can we ensure generators are aware of their regulatory obligations (i.e. registration and reporting on storage, processing and movement of subject waste) even when they have chosen to delegate registration and reporting requirements to another individual or organization?
- Continue to consult and seek feedback on new requirements and ultimately create a simple, useful guidance document.
- Contact by direct email.

2. Generators must maintain records of all data, analysis, and other information used to register subject waste. a) Now that businesses are moving digital, should we allow supporting records (e.g. data, analysis and other supporting information used in the preparation of the Generator Registration Report) to be kept electronically? Are paper copies needed?
- Copies of supporting records should be kept however the generator chooses (electronic or paper).

3. Currently spills and emergency reporting is managed through the Spills Action Centre. How should we manage registration for emergency situations going forward?

- Waste generators should still be able to add new waste classes online to facilitate disposal of waste material from a spill.

Tracking & Reporting

1. What is an appropriate amount of time to allow businesses to work offline before being required to sync their data, eliminating gaps in time between shipment and time reported?

- 3-5 business days

2. How long do generators need access to their online registration/reporting data?
a. When can we archive it from the reporting service?

- 7 years

b. Will the reporting service suffice as the record or will the generator also need to store this?

- Yes, the reporting service / electronic documents would suffice as the record. The system must have the capability to search by every field on a manifest (including the signature or plant area within a generator site). If there is no longer a requirement to reconcile the generated (green) and the received (brown) copies, manifests can be stored electronically in the new digital system. For wastes which are dangerous goods, ideally the electronic manifest is sufficient to comply with TDG Regulations (TDG information must be listed in the proper order).

c. How long should we maintain records of active manifests in the reporting service?

- An active manifest should stay in the system until the shipment is received at which point it will be closed. For some regular shipments it may make sense to create multiple draft manifests in the system, so they are available to be used as needed. This may mean there are many active manifests in the system.

3. How would you like to access electronic manifests in the reporting service if there is no longer a paper copy to file? a. pdf or excel option? b. downloaded as a flat file (i.e. as a datafile that stores data in a plain text format)?

- Excel or datafile is more useful. The data must have searchable fields.

4. How will we handle reporting during emergency situations? a. Use offline capability? b. Paper availability?

- As much flexibility as possible is needed for emergencies.

5. How can we improve awareness and compliance with short-term storage and onsite waste management requirements?

- Write simple, clear, concise guidance documents.

6. What is the best way to notify of reporting non-compliance to prevent future non-compliance and ensure timely action is taken?

- Email is the best way to provide notification.

7. How can we improve reporting of estimates and actual shipped quantities of subject waste?
a. Should the ministry allow different forms of shipped quantity to be reported? For example, allow reporting of:
o *number of 205L drums?*
o *number of Liters extracted by a vacuum truck?*

- o *number of boxes with dimensions included?*

b. Are there other ways we can improve reporting estimates?

- Be as flexible as possible. Ensure the system can still accept a manifest with differences between the amount generated and the amount received if one is estimated and one is measured.

8. What other system features would you like to see in the new reporting service?

Some preferred features would be:

- Clear calculation of fees (retain tonnage fee exemptions for recycling).
- Detailed invoices issued by the system and the user pays based on the invoice (e.g. monthly).
- The ability to pay fees with electronic transfer (in addition to Interac and credit card).
- Ability to search, sort and filter by each data field on the manifest.
- Obviously, there are multiple parties involved in completing a manifest and the transition of a document from generator to carrier to receiver needs to be simple.
- The system needs to allow the carrier to pre-fill / complete the generator section on behalf of the generator (i.e. delegates) on the Carrier's login.
- Ideally this system can also be used to provide manifest copies to Environment and Climate Change Canada for exports to the US.

Transition Planning

1. What is a reasonable amount of time to transition to electronic registration/reporting?

- 6 months to 1 year is a reasonable amount to transition. We also suggest using pilot groups to test the system before it's finalized.

2. Are there any transition issues we should be aware of?

- AMD will have to ensure that those who sign manifests have easy access to computers or if not, are assigned tablets or smart phones.
- Employees will need to be trained on how to use the new system. We recommend that the ministry / RPRA create one training program (e.g. video, slide deck) for the new system that can be distributed to all regulated parties. Help functions within the system would also be useful.

3. How much will it cost your business (i.e. labour, capital, IT, etc.) to switch reporting to a digital reporting service?

- AMD cannot provide a cost estimate at this point. The cost will be for hardware and time to train employees.

4. What supports do you need to ensure a seamless transition to a digital reporting service?

- All waste details registered in the current HWIN system should be uploaded to the new system.
- We recommend that the ministry / RPRA create one training program (e.g. video, slide deck) for the new system that can be distributed to all regulated parties. Help functions within the system would also be useful.
- Flexibility to still use paper manifests if necessary.
- 6 months to 1 year of transition time.
- Ensure an electronic manifest is sufficient for compliance with other regulations, i.e. harmonization with all those that utilize a waste manifest (e.g. Transport Canada, Environment and Climate Change Canada, Ministry of Transportation, etc.).

ArcelorMittal Dofasco G.P. T (905) 548-7200 ext. 3092
Box 2460 F (905) 548- 4574
1330 Burlington Street East paula.waite@arcelormittal.com
Hamilton, Ontario   L8N 3J5 www.arcelormittal.com
Canada

Performance Measures

1. *What performance measures should be in place to ensure the digital reporting service is working for you?*
    *   A measurement of ease of use / user friendliness

2. What performance measures would you like to see the ministry track?
    *   The ministry should track the cost of administering the Waste program. RPRA and the ministry have a responsibility to keep costs down to minimize program fees. Since the regulated community will be required to enter manifest data into the electronic system instead of the ministry, we expect the ministry to realize cost savings which should result in a fee reduction.
    *   The ministry should also have a measure for speed of resolution of technical issues.

General Discussion Questions

1. How will the Hazardous Waste digital reporting service modernization project impact you (or your business)?
    *   This change will take a significant amount of work to implement at a facility as large as AMD.

2. How would you like to be consulted on the future regulatory changes?
    *   Direct email is the best way to communicate regulatory changes. AMD will review any discussion papers and regulatory proposals as they are available and provide comments.

Any questions, please contact me at (905) 548-7200 ext. 3092 or email paula.waite@arcelormittal.com.

Sincerely,

Paula Waite
Senior Environmental Specialist

ArcelorMittal Dofasco G.P.   T (905) 548-7200 ext. 3092
Box 2460   F (905) 548- 4574
1330 Burlington Street East   paula.waite@arcelormittal.com
Hamilton, Ontario   L8N 3J5   www.arcelormittal.com
Canada