

Program Management Branch - Program Oversight

Ministry of the Environment, Conservation and Parks
HWIN Modernization
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ERO Registry #019-2332 Hazardous Waste Digital Reporting Service Modernization

To Whom it May Concern,

This letter is to provide ArcelorMittal Dofasco's comments regarding the *Hazardous Waste Digital Reporting Service Modernization* proposal.

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 5,000 employees.

A new digital hazardous waste reporting service will be a positive change. However, it will have a significant impact on a facility as large as AMD. AMD has several hundred employees who currently use waste manifests and AMD generates approximately 2,000 waste manifests per year.

Currently, the HWIN system - including waste registrations, fee payments and communications with the Ministry - is managed at AMD by the Environment Department. For waste loads travelling off-site, paper manifest forms are supplied by the Carrier and the Generator section is typically partially completed by the Carrier. There are several hundred employees throughout the AMD facility who verify/complete the manifest before signing it. Ideally, these regulatory amendments should allow for manifests to continue to be completed this way electronically.

In the new system, there should be an Administrator login (with full rights) for each generator site account to do things such as:

- Adding new subjects wastes for off-site disposal
 - Note: When the registry is set up, all waste details registered in the current HWIN system should be uploaded to the new system to avoid users having to re-enter this data.
- Updating facility, contact and payment information as required
- Adding new on-site management reports.

There should also be User logins (with rights to generate manifests only) for those who generate and/or sign manifests. Waste information would already have to be in the system by the Administrator in order to generate a manifest for that waste.

- The system needs to allow the Carrier (as a delegate, with a User login) to generate a manifest on behalf of the Generator and pre-fill / complete the generator section.

- An AMD employee can then log in as a User to complete / sign the manifest.

I'm concerned with the proposal described under "Report Completion" that *reporting information would not be accepted in the new hazardous waste digital reporting service unless:*

- *The entire waste management activity report is completed in a manner consistent with the requirements of the Regulation.*
- *Any applicable fee payable by the generator is paid by or on behalf of the business.*

The first bullet point suggests that on-site work to manage waste (i.e. transportation off-site for disposal) may be held up if there is an administrative issue with the electronic document. If the system is set up properly, the Generator, Carrier and Receiver information should populate automatically. The system should be flexible enough to accept a manifest with differences between the amount generated and the amount received (if one is estimated and one is measured).

The second bullet point suggests that fees will need to be paid in real time, as the waste leaves the Generator site for disposal. The regulated community needs to see clear calculation of fees (including tonnage fee exemptions for recycling). The system should issue detailed invoices after the fact (e.g. monthly) so the Generator pays based on the service provided which should be detailed in the invoice. The system also needs the ability pay fees with electronic transfer (in addition to Interac and credit card).

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

Sincerely,



Paula Waite
Senior Environmental Specialist