

Program Management Branch - Program Oversight

Ministry of the Environment, Conservation and Parks  
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**ERO Registry #019-2331 Hazardous Waste Fee Exemption Framework**

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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.

AMD is supportive of current fee exemptions for certain hazardous waste management activities (e.g. waste recycling) being maintained in the transition to a digital reporting service for Hazardous Waste.

The new system should:

- Provide detailed invoices (e.g. monthly) providing a clear calculation of fees
- Allow the Generator to pay based on the service provided which should be detailed in the invoice
- Allow fees to be paid with electronic transfer (in addition to Interac and credit card).

With regard to setting fees, 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.

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

Sincerely,



Paula Waite  
Senior Environmental Specialist