

Ministry of the Environment, Conservation and Parks
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November 20, 2020

ERO Registry #019-2462 Proposed Amendments to O. Reg. 406/19 and O. Reg. 153/04

This letter is to provide ArcelorMittal Dofasco's comments regarding the *Proposed amendments to O. Reg. 406/19 and O. Reg. 153/04*.

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.

AMD supports MECP's efforts to provide additional regulatory flexibility, clarity and refinement as well as efforts to streamline the reuse of excess soils. However, O. Reg. 406/19 imposes unnecessary, additional regulatory burden for an industrial site such as AMD.

Project areas which include processes identified as "potentially contaminating activities" (e.g. Iron and Steel Manufacturing and Processing) are classified as "areas of potential concern". In the event that soil from these "areas of potential concern" is not appropriate for reuse and must be relegated to landfill based on the recommendations of a Qualified Person, the requirement for registry and load tracking under the Excess Soil Regulations should be removed to reduce unnecessary administrative requirements.

All excess soil sent to landfill is accompanied by a bill of lading and the landfill's permit will require that records of material received be maintained. There is no benefit to accounting for waste sent to landfill via multiple means.

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

Sincerely,



Paula Waite
Senior Environmental Specialist