July 28, 2016 Project No. 16-744-01E

VIA EMAIL: (cory.switzer@mb.gov.ca)

Ms. Cory Switzer, P.Eng.
Environmental Approvals Branch
Manitoba Sustainable Development
Box 80, Suite 160, 123 Main Street
Winnipeg, MB R3C 1A5

Dear Ms. Switzer:

Re: Supplementary Information for Draft Dangerous Goods Handling and Transportation Act Licence
Prairieview Terminals Ltd.
6 Sabrina Way, Rural Municipality of Headingley, Manitoba

On behalf of Praireview Terminals Inc. (PVT), True Grit Consulting Limited (TGCL) is pleased to provide Manitoba Sustainable Development (MSD) with supplemental information with respect to the abovementioned Draft Dangerous Goods Handling and Transportation Act Licence. The purpose of this submission is to provide MB Conservation details on the used oil deashing process to be employed at the facility.

In order to comply with the Manitoba Association of Resource Recovery Corporation (MARRC) used oil recycling program requirements, used oil collectors must process oil to characterize and improve the quality of the material for further government approved downstream recycling and/or energy recovery applications.

Process Description - Used Oil Deashing

Used oil deashing is a relatively simple, closed-loop process intended to reduce the content of water and various metals inherently present in the bulked used oil. The process essentially occurs inherently in any storage tank containing used oil in bulk, particularly during warmer seasons, as the water phase settles over time and metals precipitate out with suspended solids. The addition of low temperature heat and a commercial de-emulsification agent combined with gravity in a closed-loop system (i.e. storage tank) promotes a more efficient process, reducing the timeframe from potentially weeks to approximately one day.

For the PVT facility, a maximum of four (4) storage tanks will be designated out of the 18 – 120,000 L storage tanks inside the secondary containment system (tank farm) for low temperature heat applications. Two tanks will be insulated and two will be non-insulated, with all being complete with an industrial grade, chemical-resistant epoxy resin coating and stainless steel heat-transfer coils. The passive ventilation nozzle on each storage tank would be connected to a pre-engineered granular activated carbon (GAC) filtration vessel such that no unfiltered fugitive emissions will occur.

1263 Innovation Drive, Thunder Bay, ON, P7B 0A2
Tel: (807) 626-5640 | Fax: (807) 623-5690
www.tgcl.ca

A commercial grade propane-fired thermal fluid heater system will be used to provide heat to the dedicated storage tanks as required, to promote efficient de-emulsification and improve the viscosity of the oil at lower seasonal temperatures for handling and transfer.

Once de-emulsification occurs, water will be drawn off the bottom section via dedicated tank nozzles for transfer to a designated wastewater tank located in the tank farm. Once bulked, the wastewater will be sampled for chemical characterization and transferred off-site to an MSD approved disposal site. Sludge accumulations will be vacuumed off the bottom of each tank for bulking in the on-site, approved sludge processing bins, with bulked material being sampled for chemical characterization and off-site disposal in accordance with the Licence.

Suggested Conditions – Used Oil Deashing

The following are suggested provisions for addition to the Draft Licence with respect to the regulation of deashed oil, possibly in combination with existing Sections 56-61 (Fuel Blending) or in a discrete section:

1. A log will be maintained on-site at all times documenting the volumes of used oil processed and the subsequent volumes of deashed oil generated.

2. A log will be maintained on-site at all times documenting the volume of used oil processed and the volumes of wastewater and sludge generated.

3. Each (bulked) batch of deashed oil will be sampled for chemical characterization at an accredited laboratory for Polycyclic Aromatic Hydrocarbons (PAHs) and dissolved metal content to determine whether the material is a hazardous waste.

4. Bulked used oil sludge shall be sampled, prior to dilution with binding agents, for chemical characterization including metals content, to determine whether it is a hazardous waste, prior to shipment off-site for disposal at an approved site.

5. Bulked wastewater shall be sampled for chemical characterization including metals content, to determine whether it is a hazardous waste, prior to shipment for off-site disposal at an approved site.

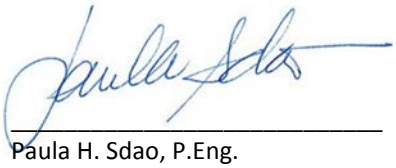
6. Deashed oil shall be stored in storage tanks clearly designated within the storage tank farm, with an inventory maintained on-site at all times.

Closure

We appreciate consideration of the above information to supplement the Draft Licence. If you have any questions or require more information, please contact the undersigned at 807.626.5640.

Sincerely,

TRUE GRIT CONSULTING LTD.



Paula H. Sdao, P.Eng.
Principal/Manager
psdao@tgcl.ca

PS:jh

Copy: Prairieview Terminals Ltd.