

October 4, 2016

Director
Environmental Assessment Licensing Branch
Manitoba Conservation
Suite 160, 123 Main Street
Winnipeg, Manitoba
R3C 1A5

Attn: Ms. Tracy Braun

**Re: De-Activation of Dangerous Goods Handling and Transportation Act Licence 272
HW for Direct LP**

Dear Ms. Braun,

Direct LP recently authorized Amec Foster Wheeler Environment & Infrastructure (Amec Foster Wheeler) to complete an Environmental Assessment (EA) Report for the proposed relocation of the waste lead acid battery transfer station at 55 Rothwell Road in Winnipeg, Manitoba to 490 Lucas Ave in the RM of Rosser, Manitoba. This process has been completed, and a new licence (*Dangerous Goods Handling and Transportation Act Licence 295 HW*) has been issued by Manitoba Sustainable Development (July 29, 2016).

As a result, *Dangerous Goods Handling and Transportation Act Licence 272 HW* is no longer required and can be rescinded. Manitoba Sustainable development requested that a review of the former facilities related to Direct LP's Waste Lead Acid Battery Transfer Station located at 55 Rothwell Road, Winnipeg be examined for any residual issues related to the transfer operation.

Direct LP requested that Amec Foster Wheeler conduct this review. This letter is to discuss our findings related to this review.

Site Visit

Mr. John Donetz, B.Sc., M.S.B., Manger Environmental Assessment for Amec Foster Wheeler Winnipeg, visited the site on Tuesday, August 30, 2016. Mr. Barry Krasniuk of Direct LP supervised the tour of the facilities. Photographs of the areas discussed below are attached to this report.

The tour began with an examination of the truck/trailer holding area. The area encompasses a large portion of the entire site, and is located on the south west portion of the property. This area is a loading/unloading waiting area for trailers, including any that were used in the transport of used batteries. The procedure was to keep a trailer in place until it was filled with batteries, and then a tractor would couple to the trailer and take it to the battery recycling facility in Calgary, Alberta. The time span for filling a trailer at the site was not recorded, but ranged from a few days to a few weeks, depending on the volume of used batteries. The holding area was

completely covered with a hard surface (concrete) that showed various levels of staining. None of the stained areas were identifiable as a result of the battery transportation operation, but were consistent with other high volume truck/trailer holding areas.

The shipping/receiving area for batteries was examined. Two separate loading docks were indicated to be the area where the batteries were placed on wooden pallets (“pallatized”), plastic wrapped, and loaded into the trailers. At the time of the site visit, no batteries remained and the area was being used for various (non-hazardous) shipping items. The concrete floor in the former battery area was similar to the floor throughout the docking area, with various markings and stains. No discernible pattern of staining that may have been related to battery handling was detectable.

The area was in close proximity to office/work space areas that contained safety procedures related to the handling of hazardous materials. Bulletin boards clearly indicated spill procedures, required safety personal safety gear, and contacts in the event of an accident. Direct LP has an integrated safety and reporting system in place.

An examination of past records since 2014 at the Direct LP warehouse showed no battery handling incidents, and no reported spills. An examination of the contaminated sites listings for the Province of Manitoba showed no change in status for the 55 Rothwell location, and the site is not found on the “All Sites” list.

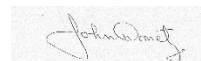
Based on the inspection of the facility, and the examination of existing records, our conclusion is that there are no residual environmental impacts to the 55 Rothwell site that are as a result of the battery shipping operation that was subject of *Dangerous Goods Handling and Transportation Act Licence 272 HW*. No residual operations that may require the continued presence of the licence are in place, and none are anticipated in the future. All such operations have been transferred to the 490 Lucas Avenue site, covered by *Dangerous Goods Handling and Transportation Act Licence 295 HW*. Therefore, it is recommended that Manitoba Sustainable Development de-active Licence 272 HW.

If you have any questions please feel free to contact the undersigned.

Sincerely,

**Amec Foster Wheeler Environment & Infrastructure,
a Division of Amec Foster Wheeler Americas Limited**

Prepared by:



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ATTACHMENT 1: PHOTOS



Figure 1: Entrance to Direct LP at 55 Rothwell



Figure 2: Trailer holding area. Note concrete surface, evidence of staining.



Figure 3: Loading and unloading dock areas that were used for battery transfer.



Figure 4: Floor in area where batteries were wrapped on pallets. Staining visible on floor is not related to battery operation.



Figure 5: Area adjacent to former battery loading area. Safety bulletins and other information are available in this area.