

Tuesday, August 18, 2020

HWIN Modernization
Program Management Branch – Program Oversight
40 St Clair Avenue West
4th Floor
Toronto, ON M4V 1M2
Canada

**RE: Discussion paper on modernizing hazardous waste reporting in Ontario
(ERO: 019-1760)**

The City of Guelph (the City) appreciates the opportunity to provide comments on the new digital reporting service for hazardous waste in Ontario. The City supports the transition from paper manifests to a new digital reporting service, and looks forward to working with the Ministry in future consultations and to provide feedback on the new digital system.

Automatic Emails

To improve digital tracking of hazardous waste by generators from the point at which it is generated to the point at which it is disposed, the Ministry should ensure that emails are automatically generated by the system. This will notify generators of any activity on their account, including when data is being added. This will allow generators to be aware of the movement of their materials.

Spills and Emergency Reporting

The digital reporting service should include a separate section for emergency situations, similar to the Spills Action Centre. This would allow for the creation of emergency generator registrations, including a series of questions to determine if emergency registration is required. During emergency situations, reporting must be available through paper and have offline capability.

Delegating Authority

The City encourages the Ministry to ensure safeguards are in place when delegating authority. Each party must be fully aware of their requirements when delegated authority to complete reporting requirements. This applies to both the generator and the organization/consultant that becomes the delegated authority.

Performance Measures

The City encourages the Ministry to track and provide the time and cost savings generated from transitioning the paper manifest system to the new digital reporting system. This tracking should relate to the goals of improving the existing service and knowledge base, increase ease of reporting subject waste, holding polluters

accountable, and to make necessary changes in the next phase of the project in 2022.

Tracking and Reporting

Generators should be provided continuous access to their online registration and reporting data to allow for information to be verified at disposal. Once the disposal is completed and data is verified, it can be archived from the reporting service. The generator should have the ability to store this as well, as required, for inspections.

Investigative Derived Waste (IDW) Exemption

The City is inquiring if the Ministry will consider exempting the HWIN registration requirement for investigative derived waste (IDW). O. Reg. 347 defines IDW as a potential industrial waste, which is not always a correct characterization of IDW (e.g. monitoring well development or purged water, which in many instances is not hazardous or characteristic waste). In many cases, IDW is slightly impacted groundwater (e.g. subsurface geotechnical-environmental investigations as part of the infrastructure design and construction projects and contaminated sites with low-level impacts).

Thank you for the opportunity to comment. We look forward to ongoing consultations with the Ministry on the wind-up of the MHSW program. Please do not hesitate to contact the undersigned if you have any questions regarding the City of Guelph's feedback.

Sincerely,

Jennifer Rose, General Manager

Environmental Services, **Infrastructure, Development and Enterprise**

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