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May 15, 2020  
File: SR 2818246

VIA EMAIL

SCOTT HILL  
ORIGINAL TRADERS ENERGY  
1110 HWY 54  
CALEDONIA ON N3W 2G9  
Email: [scott.hill@originaltradersenergy.com](mailto:scott.hill@originaltradersenergy.com)

Dear Scott Hill,

**Re: Application for a Variance from Clause 4.3.1.6 of the Liquid Fuels Handling Code, Technical Standards & Safety Act R.S.O. 2000 for 180 INDUSTRIAL PARK DR SHANNONVILLE**

You have requested permission for Original Traders Energy (OTE), to manifold the stage I vapour recovery header on the loading skid for the underground storage tanks (USTs) at the bulk plant located at the above address.

Clause 4.3.1.6 of the Liquid Fuels Handling Code 2017 (LFHC) requires that vapour recovery piping not be manifolded to prevent cross-contamination of the products in storage tanks.

The bulk plant is designed so that when a truck is at the loading rack to be filled, the fuel management system will decide which of 12 regular gasoline pumps will start to deliver regular gasoline into the truck. At the same time, the fuel management system will start the ethanol pump, and the two products will be blended as they are dispensed into the truck.

Since any of the gasoline tanks can be the source of the gasoline blending component, the truck stage I vapour recovery pipe header must have access to all 12 tanks to return the vapours from the truck compartment. To achieve this, OTE will have a four-inch vapour recovery header installed from the truck loading location and connected horizontally to the 12 regular and two premium gasoline tank vents.

It is highly unlikely that the bulk plant will switch products in the USTs and the manifold header is above ground, so it is obvious which tanks are manifolded together. Therefore, there is no danger of cross-contamination since all the tanks contain gasoline (Class I product).

Your variance application dated March 27, 2020, has been approved.

**Please be advised that this variance will not take effect until 15 days from the date of posting the decision on the environmental registry. This decision of the Director is subject to a right of appeal, under the Environmental Bill of Rights, if such an appeal is filed within 15 days from date of posting. In the event an appeal is filed, this decision of the director may be subsequently stayed, disallowed or significantly altered. Notice of an appeal will be placed on the Environmental Bill of Rights registry.**

This variance is allowed under the authority of subsection 36.(3)(c) of the *Technical Standards and Safety Act, 2000*, (the "Act") and subject to such conditions as may be specified herein, being that:

- Non-conformity with the conditions specified shall thereby cause the allowed variance to become null and void;
- The applicant accepts full responsibility for any and all damages resulting from the use of the thing to which the variance applies. The applicant further accepts full responsibility for any impacts to the health and safety of any person in consequence of the allowance of the variance or of non-conformity with the conditions specified. The Technical Standards and Safety Authority accepts no responsibility for any such damages or impacts;
- In the event of any claims against the Technical Standards and Safety Authority arising from allowance of the variance or non-conformity with the conditions specified, the applicant agrees to indemnify the Technical Standards and Safety Authority and agrees to hold it harmless from such claims and attendant costs;
- The variance process is subject to public access under the TSSA Access and Privacy Code (available upon request). The fact that a variance has been granted, and information about any public conditions, such as a requirement to post a sign, may be released on request. Subject to law and the TSSA Access and Privacy Code, proprietary information will not be subject to release;
- The applicant shall pay the fee associated with the review of the variance; and
- A copy of the variance letter shall always be kept readily available and permanently legible in the vicinity of the appliance/equipment.

This variance only relates to the Act and regulations made thereunder and does not exempt you from compliance with other applicable regulatory requirements. The installation will be inspected as part of the pre-license inspection by Mark Westen. You may contact Mark Westen at 613-401-0427.

Should you have any questions or require further assistance, please contact Ann-Marie Barker at 416.734.3354 or by e-mail at [abarker@tssa.org](mailto:abarker@tssa.org). When contacting TSSA regarding this file, please refer to the Service Request number provided above.

Yours truly,



John R. Marshall  
Director, Fuels Safety Program

- c. A. DiCocco, Claybar Contracting, [adicocco@claybar.ca](mailto:adicocco@claybar.ca)  
D. Ledingham, Petroleum Technical Services, [dgleding@eol.ca](mailto:dgleding@eol.ca)