



Notice of Violation (Corporation)

Date of notice: August 14, 2026

AMP number: 2026-AMP-02

Violation committed by: Noremtech Inc. 164-166 South Service Road Stoney Creek, ON, L8E 3H6 905-961-2204	Amount of penalty: \$ 3,970
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Violation

Failure to comply with *Transportation of Dangerous Goods Regulations* in violation of Paragraph 25(1) of the *Packaging and Transport of Nuclear Substances Regulation, 2015*.

Relevant facts

I, Nana-Owusua Kwamena, acting Director General of the Directorate of Nuclear Substance Regulation and designated officer authorized by the Canadian Nuclear Safety Commission (CNSC) pursuant to paragraph 65.01(b) of the *Nuclear Safety and Control Act* to issue notices of violation, believe on reasonable grounds that Noremtech Inc. committed the above violation. The facts relevant to the violation and the penalty calculation are as follows:

1. Noremtech Inc., located in Stoney Creek, ON, holds CNSC licence No. 12086-2-27.8 authorizing the possession, transfer, import, export, use and servicing of nuclear substances and prescribed equipment listed in the appendix of the licence.
2. Noremtech Inc. was contracted by Glencore Canada Corporation (CNSC licence No. 60378-4-29.0), located in Timmins, ON, to dispose 33 fixed gauges. Noremtech indicated that the intention was to remove most of the sources from the gauges, put the sources in a shielded Type A package, and transfer the packages to Noremtech's storage facility prior to disposal at Canadian Nuclear Laboratories (CNL), located in Chalk River, ON.
3. On November 25, 2025, Noremtech Inc. attempted to remove the sources from the gauges, however, after several attempts, the gauges were found to be too corroded to open, preventing the sources from being removed. Noremtech Inc. decided in agreement with Glencore Canada Corporation to prepare the gauges for disposal and arrange for the gauges to be shipped directly



from Glencore to CNL without the intermediate stop in Noremtech's storage facility.

4. On November 25, 2025, Noremtech placed the gauges in 3 different wooden crates, shutter facing down and with each gauge bolted to the base. The gauges were distributed as follows: 9 gauges in wooded crate #1, 8 gauges in wooden crate #2 and 16 gauges in wooden crate #3.
5. The carrier, Purolator, was provided with documents N25-8 and N25-9 for these shipments. Document N25-8 contains one shipping document, while document N25-9 contains two shipping documents. All three shipping documents were prepared on November 25, 2025. Following preparation of the documents and packages, all three wooden crates remained in storage at Glencore's site until they were collected by Purolator on May 22, 2026.
6. Consistently, across all three shipping documents, the packages were described as UN2915, RADIOACTIVE MATERIAL, TYPE A PACKAGE, non-special form, Cs-137 sources, III-YELLOW, with a transport index (TI) of 0.1.
7. On May 26, 2026, the first of three packages (Document N25-8) was received at CNL. The package was labelled with a TI of 0.1, and the accompanying shipping document identified the package as having a TI of 0.1. As per normal procedures, CNL performed an initial incoming survey and measured a TI of 0.5, exceeding the TI stated on both the package and the shipping document.
8. On May 27, 2026, CNL conducted a follow up survey on the same package as per their procedures. During this survey, a dose rate of 1600 mrem/hr (16 mSv/h) was measured near contact at the center of the underside of the package. This dose rate exceeds the maximum dose rate associated with the labelled TI of 0.1.
9. Two additional packages were received on May 29, 2026, (Document N25-9). As per normal procedures, CNL performed an initial incoming survey of these two packages and measured a TI of 1.1, which was greater than the TI of 0.1 stated on the packages and shipping document.
10. CNL's investigation of these shipments determined that:
 - o At least one gauge, believed to be Serial No. B158 was transported with a shutter in the open position on the shipment received on May 26, 2026 (Document N25-8)
 - o Pre-shipment surveys were not properly executed resulting in incorrect TI calculations for each of the three packages. (Documents N25-8 and N25-9)
11. On May 28, 2026, Noremtech informed a CNSC Licensing Specialist by email that CNL would be contacting the CNSC regarding a disposal shipment received from Glencore Canada Corporation in Timmins, Ontario. Noremtech advised that CNL had identified a hot spot on a package prepared by Noremtech and that, based on photographs provided, the hot spot was believed to be associated with source serial number B158. Later that day, CNL reported the situation to the CNSC Duty



Officer after measuring elevated radiation levels on the package and identifying discrepancies associated with the shipment documentation.

12. CNSC staff reviewed all three shipping documents and photos of the packages that were provided and identified multiple non-compliances with the *Transportation of Dangerous Goods Regulations* (TDGR) including:

- Each gauge had not been labelled as required by section 4.10(3)(c) of the TDGR
- Shipping names and UN numbers were not listed on the gauges as required by sections 4.11 and 4.12 of the TDGR
- The safety marks were missing on all gauges as required by sections 4.6 and 4.7(2)(3) of the TDGR
- On all three shipping documents, the number of packages were not correctly listed as required by section 3.5(1)(e) of the TDGR. The number of packages were listed as 1, but each gauge was a separate Type A package: (9 gauges in wooded crate #1, 8 gauges in wooden crate #2 and 16 gauges in wooden crate #3)
- On all three shipping documents, the words ‘24-Hour Number’ followed by a telephone number was not present as required by section 3.5(1)(f) of the TDGR
- On all three shipping documents, the consignor’s declaration did not match an authorized declaration as required by section 3.6.1(1) of the TDGR
- All three shipping documents incorrectly indicate that placards were not required. Because the shipment contained packages bearing Category III-YELLOW labels, placarding of the vehicle was required under sections 4.15 and 4.15.1(d) of the TDGR. Furthermore, subsection 4.4(1)(c) of the TDGR requires the consignor to provide the carrier with the required placards. Although there is no evidence to confirm whether placards were provided to the carrier, Purolator confirmed to CNSC staff on July 3, 2026, by email that the vehicle used for transport was not placarded.

13. In addition, several non-compliances with the IAEA *Regulations for the Safe Transport of Radioactive Material* (SSR-6) and the *Packaging and Transport of Nuclear Substances Regulations, 2015* (PTNSR, 2015) were identified. In summary,

- The consignee treated an overpack as a Type A package even though the overpack did not meet the applicable requirements for a Type A package. The individual packages contained within the overpack were themselves Type A packages.
- The method used to calculate the TI was not properly executed as the TI value calculated by Noremtech was inconsistent with the surveys results and TI values determined by CNL upon receipt of the packages.
- The required identification of the consignor and/or consignee was not displayed on the package. In addition, had the overpack been intended for use as a package, it would have been required to write the marking “TYPE A” in addition to the proper shipping name and gross mass; these markings were not visible in the available photographs.



- The information on the shipping documents was not presented in the prescribed order: The activity being listed before the physical and chemical form, and the category label being presented before the TI.

14. Overall, Noremtech Inc. failed to meet requirements of the TDGR and by doing so was in violation with Paragraph 25(1) of the *Packaging and Transport of Nuclear Substances Regulations, 2015*. These deficiencies resulted in failures in hazard communication and regulatory documentation requirements and contributed to an inaccurate assessment of the radiological hazards associated with the shipments. These requirements are essential to ensure safe transport and effective emergency response activities.
15. Failure to comply with the TDGR is listed as a Category C violation under Part 8 of the Schedule to the *Administrative Monetary Penalties Regulations (Canadian Nuclear Safety Commission)* (“the Regulations”), and pursuant to section 4 of the Regulations, is subject to an administrative monetary penalty in the range of \$1,000 to \$100,000 for a person who is not an individual (i.e.: a corporation).

Based on my review of this matter, I am of the opinion that an administrative monetary penalty will deter recurrence of the above violation and promote future compliance with CNSC regulatory requirements. In consideration of the seven factors in section 5 of the Regulations, I have determined the amount of the penalty based on the following relevant facts:

1. Compliance history: Assessed score = 0

A compliance history review of Noremtech Inc. was conducted from January 2020 to June 2026. This review identified that one (1) inspection was conducted in February 2024. Although this inspection resulted in multiple notices of non-compliance, none were related to transportation of dangerous goods requirements. Therefore, there is no negative compliance history for this type of event.

2. Intention or negligence: Assessed score = +3

The violations demonstrate a moderate degree of negligence, as the consignor failed to properly conduct pre-shipment radiation surveys, determine accurate transport indices, and verify compliance with marking, labelling and placarding requirements. Furthermore, for all three shipments, the TI declared on the shipping documents did not match the TI subsequently calculated by CNL, indicating deficiencies in the consignor’s verification. Additionally, the overpack was treated as a Type A package even though it did not meet the applicable regulatory requirements. These deficiencies demonstrate a lack of due diligence in ensuring compliance with the applicable transport regulations prior to shipment.

3. Actual or potential harm: Assessed score = +2

Based on the information provided, the workers at Noremtech, Purolator, and CNL could have been exposed to higher-than-expected radiation fields resulting in increased doses to these workers. Further, given the incorrect labelling, should an accident have occurred, proper precautions may not have been



taken. The surveys performed upon receipt by CNL identified the issue before any known overexposures occurred. Therefore, no actual adverse health effects or significant consequences were identified.

4. Competitive or economic benefit: Assessed score = 0

The licensee does not appear to have derived any competitive or economic benefit due to the violation.

5. Efforts to mitigate or reverse effects: Assessed score = 0

Noremtech Inc. demonstrated reasonable efforts to mitigate the consequences of the violation by promptly reporting the event, cooperating with the CNSC and consignee, and implementing corrective measures to address the identified deficiencies.

6. Assistance to Commission: Assessed score = -2

The licensee submitted the final event report within the required timeline, and all follow-up questions from CNSC staff were responded to as requested.

7. Attention of Commission: Assessed score = -2

The licensee informed the CNSC on May 28, 2026, immediately after discovering they failed to comply with the *Transportation of Dangerous Goods Regulations*.

Attachments

- CNSC Document [HV7FV6F2Y4HS-734330582-20](#) – Combined Report – Elevated Dose Rates Discovered on Commercial Waste Shipment – DWM-26-2149
- CNSC Document [PKXQZQUWMQND-1950386090-16](#) – Initial Event Notification from Noremtech Inc.
- CNSC Document [HV7FV6F2Y4HS-734330582-22](#) – Final Event Report from Noremtech Inc.
- CNSC Document [HV7FV6F2Y4HS-734330582-25](#) – Shipping Document N25-8 Glencore
- CNSC Document [HV7FV6F2Y4HS-734330582-42](#) – Shipping Document N25-9 Glencore
- CNSC Document [PKXQZQUWMQND-1950386090-15](#) – Noremtech NRW 2026 Jan rev 6, 13 Apr 2026
- CNSC Document [81RPIRXSSS98-856264091-133](#) – Email Confirmation from Purolator that the Vehicle was not Placarded





Penalty calculation:

(See *Administrative Monetary Penalties Regulations (Canadian Nuclear Safety Commission)* SOR/2013-139)

(a) Category of violation

Category A ☐

Category B ☐

Category C ☒

(b) Penalty range

Category	Minimum	Maximum	Maximum – minimum
A	\$1,000	\$12,000	\$11,000
B	\$1,000	\$40,000	\$39,000
C	\$1,000	\$100,000	\$99,000

(c) Determining factors

Factors	Scale of regulatory significance	Assessed score
1. Compliance history	0 ☒ +1 ☐ +2 ☐ +3 ☐ +4 ☐ +5 ☐	0
2. Intention or negligence	0 ☐ +1 ☐ +2 ☐ +3 ☒ +4 ☐ +5 ☐	+3
3. Actual or potential harm	0 ☐ +1 ☐ +2 ☒ +3 ☐ +4 ☐ +5 ☐	+2
4. Competitive or economic benefit	0 ☒ +1 ☐ +2 ☐ +3 ☐ +4 ☐ +5 ☐	0
5. Efforts to mitigate or reverse effects	-2 ☐ -1 ☐ 0 ☒ +1 ☐ +2 ☐ +3 ☐	0
6. Assistance to Commission	-2 ☒ -1 ☐ 0 ☐ +1 ☐ +2 ☐ +3 ☐	-2
7. Attention of Commission	-2 ☒ -1 ☐ 0 ☐ +1 ☐ +2 ☐ +3 ☐	-2
Total		1
÷ 29 ⁽¹⁾ [rounded to 2 decimal points]=		0.03
x \$99,000		
[total] =		\$2,970
+ \$ 1000 [minimum for the category] =		\$3,970

⁽¹⁾29 being the maximum value of regulatory significance



To request a review

As a person subject to an administrative monetary penalty, you have the right to request a review of the amount of the penalty or the facts of the violation, or both. Your request must be made in writing indicating the reasons why you are requesting a review and providing supporting information.

If you choose to request a review, you must do so in writing by September 25, 2026 to:

Canadian Nuclear Safety Commission
c/o Candace Salmon
Commission Registrar
P.O. Box 1046, Station B
Ottawa, ON K1P 5S9

Fax: (613) 995-5086
Telephone: (613) 995-6506
Email: registry-greffe@cnsccsn.gc.ca

Payment

You may pay this administrative monetary penalty by sending a cheque to:

Receiver General for Canada
c/o Canadian Nuclear Safety Commission
Finance Division
P.O. Box 1046, Station B
Ottawa, ON K1P 5S9

For other payment methods and further instructions, please refer to the attached notice of payment due.

Should you neither pay the penalty nor exercise your right to a review, you will be considered as having committed the violation and will be liable to the penalty set out herein.



Issued by

Nana-Owusua Kwamena

Designated Officer

Date

Telephone: 343-543-6760

Email: nana-owusua.kwamena@cnscccsn.gc.ca